

# **BEPS response to the Applicant's responses to Relevant Representations**

## **Whether the Applicant has substantively answered the issues raised by BEPS, and implications for the adequacy of consultation and the Examination record**

### **1. Purpose of this submission**

BEPS has reviewed the Applicant's responses to its Relevant Representations in *The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties* [EXAM/8.8], together with the Applicant's broader thematic responses in Part 5 [EXAM/8.10]. The comparison has been made against BEPS's Full Relevant Representation and Summary Relevant Representation. BEPS Relevant Representations -... BEPS Relevant Representations S... EN0110014-000562-8.8 The Applic... EN0110014-000565-8.10 The Appli...

This submission does not proceed on the basis that the Applicant is required to agree with BEPS, nor that every disagreement must be resolved in an Applicant response to Relevant Representations. The narrower issue is whether the responses actually engage with the points made, identify evidence capable of answering them, and assist the Examining Authority in determining whether an objection has been resolved, partly resolved or remains outstanding.

That distinction is particularly important where BEPS's objection concerned the adequacy of the pre-application consultation itself. Sections 42, 47 and 48 of the Planning Act 2008 contain the statutory consultation duties, while section 55 defines an 'adequacy of consultation representation' by reference to compliance with those duties. Regulation 12(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 defines preliminary environmental information as information reasonably required to enable consultation bodies to develop an informed view of the likely significant environmental effects. [Legislation.gov.uk](https://www.legislation.gov.uk)

A later Environmental Statement or later Examination response may be relevant to the substantive merits of an issue, but it does not retrospectively answer the separate factual question of what information was available to consultees when consultation occurred. The Applicant's responses repeatedly fail to maintain that distinction.

### **2. Overall findings**

The Applicant has responded to a very large proportion of BEPS's individual representations in formal terms. The difficulty lies in the nature of many of those responses.

Across EXAM/8.8, four recurring response types can be identified.

First, there are genuine substantive responses in which the Applicant supplies additional factual material or explains its position. Those responses allow the underlying disagreement to be identified more clearly.

Secondly, a large number of responses simply direct BEPS back to the Environmental Statement, Planning Statement, Site Selection Assessment, outline management plans or another earlier response. In those cases the original BEPS objection was often that the cited document itself was deficient. Repeating the document reference does not answer that criticism.

Thirdly, a number of responses answer a narrower or different proposition from the one BEPS raised. The clearest examples occur in relation to barbastelle bats, white-clawed crayfish, hydrogeology, the distinction between EIA significance and heritage-policy harm, and the role of later detailed design.

Fourthly, a significant group of responses actually confirms the factual premise of BEPS's objection: that further surveys, investigations, risk assessments, final designs, management plans or third-party agreements will be undertaken later. In those cases the Applicant disagrees with BEPS about the significance of the deferral, but does not establish that the underlying uncertainty has already been resolved.

This is important to the Examination because a response should not be treated as resolving an objection merely because an Applicant response exists in the table. The substance of the answer has to be considered.

**There is a distinct and important category where EPS appears to answer the representation, but the content of the answer itself demonstrates the inadequacy BEPS was complaining about.**

The clearest examples are these.

| Issue                                      | What BEPS asked / objected to                                                                                                                      | What EPS says in response                                                                                                                                                                                                 | Why the response itself demonstrates inadequacy                                                                                                                                |
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| Botanical survey / verges and access works | BEPS said the botanical baseline was incomplete and that rare plants and species-rich verges, banks and roadside habitats could be affected by new | EPS relies on its desk study, habitat-condition/BNG work and the fact that much of the development is within intensively farmed fields. For visibility-splay and road works it relies on later traffic-management/detail. | This effectively confirms that the survey effort was designed around the fields rather than the actual footprint of all works. That is the precise weakness BEPS identified. A |

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|                       | access, haul-road and vegetation works.                                                                                                                                          |                                                                                                                                                                             | project which requires verge clearance, widening, visibility splays and access works cannot dismiss specialist verge botany because the generating development is mainly in arable fields. The Applicant's own Scoping Report already identified designated road verges with notable botanical diversity near the Scheme.                                             |
| White-clawed crayfish | BEPS said there was evidence of a breeding population within the connected Tas system and that downstream Scheme crossings therefore needed precautionary survey and assessment. | EPS answers that no white-clawed crayfish records were identified 'within the Order Limits' and relies on habitat suitability, pollution controls and later technical work. | That answer confirms a red-line-boundary approach to an aquatic receptor. BEPS's point was specifically about a connected upstream population and downstream impact pathways. The Scoping Opinion required surveys at relevant locations when works affecting watercourses were known, not merely a search for records inside the Order Limits. Pins scoping response |
| Ground investigation  | BEPS said the ground-conditions                                                                                                                                                  | EPS says intrusive ground investigation will be undertaken                                                                                                                  | This is one of the strongest admissions. The                                                                                                                                                                                                                                                                                                                          |

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|                        | baseline was too dependent on desk study and that intrusive GI was needed to establish actual geological and groundwater conditions. | later/post-consent and will inform Foundation Works/Piling Risk Assessments and hydrogeological assessments. | Environment Agency had already identified uncertainty across the majority of the Site and specifically recommended intrusive investigation to characterise ground conditions and update the preliminary risk assessment. Pins scoping response EPS's answer therefore does not show the concern was mistaken; it confirms the missing evidence will be obtained later. |
| Private water supplies | BEPS said the locations, depths, source strata and hydraulic connectivity of private water supplies were not sufficiently known.     | EPS relies on later investigation, monitoring and risk assessment, together with generic pollution controls. | The response demonstrates that receptor characterisation is incomplete now. The EA expressly stated that accurate locations and abstraction strata were lacking and that reasonable worst-case assumptions were needed in their absence. Pins scoping response Monitoring later does not establish the pre-consent source-pathway-receptor model.                      |

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| Hydrogeological conceptual model | BEPS said the relationship between Lowestoft deposits, Crag, Chalk, groundwater and surface water was insufficiently characterised.                            | EPS relies on later Foundation Works Risk Assessments and Hydrogeological Risk Assessments for HDD/trenchless works.                                                                                                                                  | Again, the answer confirms that key hydrogeological questions are being left to future risk assessment. The EA's scoping response had already identified incomplete groundwater-surface water connectivity and insufficient design parameters for HDD/deep foundations.                  |
| HDD and trenchless crossings     | BEPS said there was insufficient evidence to know whether HDD would intercept aquifers, groundwater or sensitive receptors.                                    | EPS says a hydrogeological risk assessment will be prepared later where required.                                                                                                                                                                     | That is not merely detail if the later assessment could conclude that the crossing method or alignment is unsuitable. The response therefore demonstrates that the acceptability of some crossings is not yet established.                                                               |
| BESS fire safety                 | BEPS said the final technology, chemistry, layout, spacing, suppression strategy and consequence modelling were not fixed, so the safety case was provisional. | EPS expressly states that final comprehensive risk assessments, final BESS design, site-specific consequence modelling and detailed Emergency Response Plans can only be prepared when the specific BESS design is selected at detailed-design stage. | This is an explicit confirmation of BEPS's point. EPS has a safety framework, but not yet a final system-specific safety case. The question is therefore whether the present envelope is sufficiently conservative to guarantee that later testing will not require materially different |

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|                           |                                                                                                                            |                                                                                                                                                  | spacing, layout, containment or emergency controls.                                                                                                                                                                                                                               |
| BESS plume modelling      | BEPS said current plume modelling depended on assumptions about battery chemistry, enclosure, source term and propagation. | EPS says another site- and system-specific plume study will be undertaken at detailed design.                                                    | That means the present plume assessment is not the final assessment of the actual system to be installed. The response confirms that the environmental conclusion will be revisited once actual technology is selected.                                                           |
| BESS Gate 2               | BEPS said the BESS is only Gate 1 and therefore its claimed storage/flexibility benefits are contingent.                   | EPS confirms that, if consent is granted, it intends to resubmit the BESS element in a future prioritisation round to seek Gate 2.               | This directly confirms the contingency rather than resolving it. The BESS is not currently secured on the same basis as the solar element. The applicant does not explain by which mechanism it will obtain gate 2 as it currently doesn't appear to be eligible for any of them. |
| BNG after decommissioning | BEPS asked how habitats relied upon for BNG would survive if the land is ultimately returned to agriculture.               | EPS says the landowner may use/manage the land after decommissioning and that EPS cannot dictate what happens once it no longer has an interest. | This is particularly damaging to the claimed permanence of BNG. If EPS cannot secure the continued existence of those habitats after decommissioning, then part of the claimed net gain                                                                                           |

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|                                             |                                                                                                |                                                                                                                                                                                                         | may be temporary. SNC had already asked the Applicant to identify which habitats would actually remain after decommissioning.                                                                                                                          |
| BNG and replacement cycles                  | BEPS raised the risk that ecological land could later be reused during panel/BESS replacement. | EPS's application assumes full solar-panel replacement once and BESS replacement up to five times, while later logistics and compounds remain to be detailed.                                           | The response demonstrates a lifecycle conflict that has not been resolved. NCC's LLFA had already noted that replacement may require the same type of temporary compounds and hardstanding as construction but that their future location was unclear. |
| Site 6 BNG / construction-compound conflict | BEPS identified Site 6 as both ecological/BNG land and construction-compound land.             | EPS describes Site 6 as land 'given over entirely to biodiversity mitigation', while the Scheme documentation also identifies construction functions requiring temporary compounds and later logistics. | If both propositions apply, the Applicant must explain sequencing, disturbance and whether the habitat is actually functioning when it is counted. The apparent answer creates a further question rather than resolving the original one.              |
| Site 7 BNG / access conflict                | BEPS identified an access route through/opening into land intended for ecological              | EPS relies generally on management and mitigation rather than demonstrating how that area remains ecologically functional                                                                               | The response does not resolve the physical incompatibility. An area cannot simply be counted as undisturbed                                                                                                                                            |

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|                                  | mitigation and nesting birds.                                                                                              | during construction access.                                                                                                                          | nesting or BNG habitat if it is simultaneously a traffic route unless the disturbance is factored into its condition and ecological value.                                                                                 |
| Water Framework Directive        | BEPS said the WFD assessment was being presented as conclusive despite incomplete hydrogeological and ecological evidence. | EPS says the WFD assessment is based on current information and will be 'kept under review' as further information becomes available through design. | That wording itself shows that the assessment is not fixed. If later evidence can alter the WFD conclusion, the present conclusion is necessarily provisional.                                                             |
| Drainage / infiltration          | BEPS said infiltration feasibility and receiving pathways were unresolved.                                                 | EPS relies on future infiltration testing and later detailed drainage design.                                                                        | That confirms the drainage solution is not fully demonstrated. The LLFA had already said ground conditions and infiltration viability had not been investigated and that poor infiltration was known in parts of the Site. |
| Surface water during replacement | BEPS said replacement cycles could recreate construction-scale runoff and disturbance.                                     | EPS assumes replacement would not exceed construction but does not fix whether construction compounds/hardstanding will be reused or where.          | NCC's LLFA explicitly identified this as unresolved and requested further information. The Applicant's lifecycle assumptions therefore expose a gap in the environmental envelope.                                         |

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| Decommissioning / 'temporary' nature | BEPS questioned whether the Scheme is genuinely temporary where infrastructure remains.                          | EPS confirms some infrastructure will remain, including National Grid/Grid Connection elements, underground cables and potentially access tracks, with some retention to be agreed later. | This directly weakens any simple description of the Scheme as fully reversible. NCC's LLFA explicitly said those retained elements should be treated as permanent and noted that 'reinstated to its original use as far as practicable' already admits full reinstatement may not occur.                                                                                              |
| Barbastelle functional habitat       | BEPS said the issue was not mere presence but maternity-colony function, commuting routes and feeding landscape. | EPS responds substantially by pointing to agricultural disturbance, retained hedgerows and the fact that much land is intensively managed.                                                | That answer itself shows the mismatch in methodology. Existing agricultural disturbance does not establish that conversion to fenced solar arrays preserves maternity-colony function. The response addresses habitat condition generically, not the species-specific network BEPS identified. It ignores the Stewardship conservation status of much of this agricultural landscape. |
| Bat surveys                          | BEPS argued that static detectors and transects                                                                  | EPS relies on its existing activity survey                                                                                                                                                | The later NBSG evidence shows why that is                                                                                                                                                                                                                                                                                                                                             |

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|                                        | cannot fully identify maternity-colony functional use and called for radio-tracking.           | programme and mitigation.                                                                                                     | insufficient: radio-tracking is needed to identify roost networks and colony-specific use. The Applicant's response therefore demonstrates reliance on survey methods which answer presence/activity but not the full functional question. |
| Ancient woodland / planting mitigation | BEPS said screening does not restore historic/ecological openness or functional relationships. | EPS repeatedly relies on future planting and buffers.                                                                         | The response demonstrates that mitigation is being used to screen rather than necessarily avoid the underlying harm. This is particularly significant for heritage setting and woodland-edge ecological function.                          |
| Heritage archaeology                   | BEPS said archaeological understanding remained incomplete.                                    | EPS says further geophysical work/trenching and detailed Archaeological Mitigation Strategy work will follow detailed design. | That confirms part of the archaeological baseline/mitigation package remains contingent. The question becomes whether later work simply defines mitigation or could reveal constraints requiring redesign.                                 |
| Heritage policy harm                   | BEPS said 'not significant' in EIA terms does not mean 'no harm'                               | EPS relies repeatedly on Chapter 10's no-significant-residual-effect conclusion.                                              | The response exposes the conflation BEPS objected to. Historic England's                                                                                                                                                                   |

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|                                        | in heritage policy terms.                                                                                             |                                                                                                                                                                | position that residual policy harm remains cannot be answered merely by repeating an EIA significance conclusion.                                                                                                                                       |
| Site selection / Great Moulton         | BEPS asked whether the move from Norwich Main to Great Moulton caused a fresh location-based site-selection exercise. | EPS says the Site Selection Assessment considered environmental, planning, technical and land factors and that no more suitable available land was identified. | This sounds substantive, but it does not answer the chronology. The response never demonstrates that a fresh Great-Moulton-centred exercise was actually undertaken after the PoC changed. It therefore leaves the very question BEPS asked unresolved. |
| Availability of land in site selection | BEPS said landowner willingness may have shaped the outcome more than environmental suitability.                      | EPS expressly identifies 'suitable and available land' as one of the principal selection factors.                                                              | That is useful new information, but it also supports BEPS's concern that land availability materially influenced the portfolio. The remaining question is how that factor was weighted against environmental constraints.                               |
| DCO flexibility                        | BEPS said broad wording and later management plans could allow substantive decisions to be                            | EPS says flexibility is intentionally retained for cable routing, access points, visibility requirements, PRow, vegetation                                     | This is another important admission. The response confirms flexibility precisely in areas which can determine                                                                                                                                           |

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|                                    | made after consent.                                                                                                       | retention/removal and other detailed matters.                                                                                                                     | environmental effects. The issue becomes whether the ES assessed the full reasonable worst case for each of those flexibilities.                                                                                      |
| 'Substantially in accordance with' | BEPS objected to additional flexibility in final plans.                                                                   | EPS says detailed plans will be 'substantially in accordance with' outline plans and explains that change may be justified if technology or circumstances evolve. | The answer confirms there is intended discretion to depart from outline controls. It therefore strengthens the need for defined limits on what 'substantially' permits.                                               |
| Construction traffic               | BEPS said many local roads are physically constrained and final route feasibility had not been demonstrated.              | EPS relies partly on future specialist-haulier planning, traffic management, marshals and later detailed CTMP measures.                                           | This demonstrates that management is being used to deal with constraints which are not all fixed now. Where route geometry or structural crossing capability remains uncertain, that is more than operational detail. |
| PRoW                               | BEPS said keeping a legal line open does not preserve usability where routes become enclosed, fenced or crossed by works. | EPS emphasises that PRoWs can remain available subject to later management plans.                                                                                 | The response reveals the conceptual mismatch: legal availability is being used as a proxy for practical usability, safety and amenity.                                                                                |
| Noise                              | BEPS said final operational mitigation depended on                                                                        | EPS relies on future selection of quieter equipment, acoustic enclosures, relocation/reorientation                                                                | This shows that the precise mitigation necessary to achieve the assessed outcome                                                                                                                                      |

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|                                 | future plant choice.                                                 | and barriers where required.                                                     | is not yet fixed. If relocation or reorientation may be required, that is not necessarily minor detail.                                                                                                                       |
| Archaeological field evaluation | BEPS said buried archaeology had not been fully characterised.       | EPS relies on later targeted trenching/mitigation once detailed design is known. | Again, the response confirms that some archaeological evidence will be generated only after the development envelope is authorised.                                                                                           |
| UXO                             | BEPS said former airfields create unresolved UXO risk.               | EPS relies on later UXO investigation and construction controls.                 | That may be acceptable as a safety-management matter in some locations, but where UXO avoidance could alter excavation, foundation or cable methodology, the response confirms that consequences remain to be worked through. |
| Cumulative effects              | BEPS said project-specific cumulative interactions were understated. | EPS largely points back to Chapter 19 and its general cumulative methodology.    | The response demonstrates that the Applicant is answering 'we have a cumulative chapter' rather than testing the specific omitted or disputed interactions BEPS identified.                                                   |
| Consultation-stage adequacy     | BEPS said consultees lacked enough information at                    | EPS repeatedly relies upon the later submitted ES as evidence that the           | This answer itself demonstrates a temporal mismatch. A later                                                                                                                                                                  |

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|                       | the time of consultation.                                                            | position is now adequately assessed.                                                                                                                         | ES can improve the Examination record, but it does not show consultees had the same information at the statutory or targeted consultation stages.                                                |
| Targeted consultation | BEPS said material changes were consulted on without updated environmental material. | EPS says it internally reviewed the changes and concluded that no materially new or different significant effects arose, so an updated PEIR was unnecessary. | This confirms that consultees were asked to accept EPS's conclusion without seeing the environmental analysis underlying it. That is precisely the consultation-information concern BEPS raised. |

### 3. Consultation adequacy

#### 3.1 Scheme stability and the use of the later Environmental Statement

BEPS's consultation objection was specific. It argued that statutory consultation took place upon a very large and evolving Scheme; that the PEIR itself acknowledged continuing EIA and design development; that later targeted consultation introduced materially altered infrastructure, access and land requirements; and that the information available during consultation was therefore not equivalent to the Scheme eventually submitted.

In BEPS-043, the Applicant responds that consultation was 'robust' and that consultation is necessarily carried out on emerging proposals rather than finalised designs. It then relies upon the fact that a 'robust Environmental Statement' was provided at submission.

That only partly answers the point. BEPS did not argue that no design evolution can occur after statutory consultation. The issue was whether the degree and nature of the

changes meant that consultees lacked sufficient information to understand and respond to the likely significant effects of the Scheme which was ultimately submitted.

The subsequent production of an Environmental Statement does not itself answer that question. Regulation 12 concerns the information reasonably required during consultation so that consultation bodies can form an informed view. The Applicant's response therefore moves from the sufficiency of the information available during consultation to the later completeness of the application.

The Applicant does provide useful factual context by explaining that the statutory consultation boundary of approximately 2,232 ha included the then-unrefined Cable Route Corridor and that the submitted Order Limits reduced to approximately 1,212.3 ha. That explains part of the numerical change. It does not, however, answer the separate concerns about altered infrastructure, access routes, vegetation works, the National Grid substation arrangements and newly affected communities.

BEPS therefore considers this point only partly answered.

### 3.2 Reliance on acceptance of the application

The Applicant repeatedly states that acceptance of the DCO application for examination 'serves as confirmation' that its statutory pre-application duties were fulfilled. It makes that response to the general consultation objection and repeats it in answer to BEPS's criticism of the section 55 checklist. That is not a sufficient answer to the factual matters BEPS raised.

Acceptance under section 55 is an important statutory gateway. The Secretary of State must have regard to the Consultation Report and relevant adequacy-of-consultation representations when applying the acceptance test. It does not follow that the existence of an acceptance decision independently answers every factual issue raised by an Interested Party about the conduct or informational basis of consultation.

For example, acceptance does not explain whether a particular altered access route was accompanied by sufficient environmental information when consultees were asked to comment upon it. Nor does it explain whether newly affected communities had previously been able to comment upon the wider project. Nor does it answer whether significant ecological evidence supplied during consultation was properly taken into account.

The response therefore asserts the procedural result rather than engaging with the underlying evidence.

### 3.3 Access to the final Environmental Statement and the £5,000 hard-copy charge

BEPS's objection concerned access to the final Environmental Statement after submission of the DCO application, rather than the earlier £750 charge stated for a complete printed PEIR during statutory consultation.

The distinction is important. The PEIR was preliminary environmental information produced for the pre-application consultation. BEPS's later concern was that the final application comprised an exceptionally large and complex Environmental Statement and associated appendices, plans and technical documents, yet the Applicant indicated that a complete printed copy of the final ES would cost approximately £5,000.

BEPS's point was therefore directed at effective participation after submission. The final ES contains the Applicant's completed environmental case, including information which was incomplete, provisional or absent at PEIR stage. It is the material which Interested Parties need to scrutinise when deciding whether to register, preparing Relevant Representations and subsequently participating in the Examination. That is particularly significant in this case because many of BEPS's objections concern differences between the preliminary information made available during consultation and the substantially more developed evidence eventually submitted with the application.

The Applicant's response to BEPS-044 appears instead to address the earlier PEIR arrangements. It explains that the £750 figure represented the cost of producing a full printed PEIR, that electronic copies were available without charge, that individual documents could be requested, and that consultation copies were available at events and at Long Stratton Library. Those points may answer a different criticism concerning accessibility during the statutory consultation, but they do not answer BEPS's actual complaint about the approximately £5,000 cost quoted for a complete hard copy of the final Environmental Statement after the application had been submitted.

The response should therefore be categorised as a **misunderstanding or deflection**, rather than as a substantive answer.

The relevant questions remain unanswered. The Applicant does not explain why a complete printed version of the final ES was priced at approximately £5,000, what arrangements were made for residents who could not reasonably review thousands of pages of environmental material electronically, whether complete printed sets of the final ES were deposited at accessible local locations, or whether an Interested Party could obtain the complete final ES in hard copy without incurring a prohibitive charge.

This is particularly important in a rural examination involving a very large documentary record. The issue is not whether electronic publication satisfies a minimum publication mechanism in the abstract. It is whether the arrangements provided a realistic means

for affected residents, including those with limited digital access or difficulty working from extensive electronic documents, to examine the Applicant's final evidential case.

The Applicant's response therefore does not resolve BEPS's point. It answers the cost and availability of the earlier PEIR rather than the cost and accessibility of the final Environmental Statement which formed the basis of the accepted application and Examination.

### 3.4 Parish councils and consultation-record errors

BEPS identified the erroneous description of Pulham Market Parish Council as Pulham St Mary Parish Council and the later addition of Framingham Earl Parish Council following further due diligence. The Applicant acknowledges the Pulham Market correction, states that Pulham Market was in fact consulted at the relevant stages and confirms that both Pulham Market and Framingham Earl were subsequently served under section 56.

That answers whether Pulham Market was actually contacted notwithstanding the reporting error. It does not answer the wider point about Framingham Earl. Service under section 56 after acceptance is not the same thing as participation in the pre-application consultation process. The relevant question remains whether the late identification of that parish indicates that the affected consultation geography was incomplete at the earlier stage.

The response is therefore partly substantive but does not remove the underlying issue.

### 3.5 Number of substations and evolving Scheme description

BEPS identified inconsistency between consultation-stage material referring to 'up to two 400kV substations' and later application material concerning the number of 400kV substations.

The Applicant answers by stating the current position: three 400kV Project Substations, up to three 132kV Project Substations and a new National Grid Substation, and invokes the Rochdale Envelope and iterative design process.

That explains the present Scheme. It does not answer why materially different descriptions existed at different stages or what consultees were reasonably able to understand at the time. The distinction is significant. Current clarification cures present ambiguity; it does not necessarily cure consultation-stage ambiguity.

### 3.6 Targeted consultation and absence of an updated PEIR

BEPS-047 raised a very specific issue: both host-authority adequacy representations had raised consultation concerns, while the Applicant's section 55 checklist presented

a compliant narrative; the targeted consultation involved infrastructure, access, vegetation and newly affected-community changes but no updated PEIR.

The Applicant refers back to its general consultation response and states that the additional areas and activities were reviewed and did not change the likely significant effects identified at PEIR stage, so an updated PEIR was unnecessary.

This identifies the Applicant's conclusion, but not the evidential route to that conclusion. The original BEPS point concerned precisely the absence of the environmental analysis necessary for consultees to test the proposition that no materially different significant effects arose. Saying that the Applicant reviewed the changes and reached that conclusion is not equivalent to showing that analysis.

The Examination would therefore benefit from a single schedule identifying each targeted-consultation change, the environmental topics reviewed, the receptors considered, the conclusion on whether effects altered, and the document in which that reasoning was available to consultees. Without that exercise, the response remains essentially conclusory.

## 4. Consultation evidence which BEPS says was provided but not incorporated

BEPS-048 identified four categories of material which it said had been given to the Applicant before application but were not properly reflected in the ES: Norfolk Rivers Trust information concerning white-clawed crayfish; botanical evidence from Alex Prendergast; Norfolk Barbastelle Study Group evidence; and the material concerning DESNZ/Macquarie engagement.

The Applicant's response is largely generic. It points to the Consultation Report, states that ecological survey methodologies had been agreed through scoping and consultation and refers to the ecological appendices. It then acknowledges that the ExA had requested further information concerning white-clawed crayfish.

That does not answer the evidential question BEPS raised: whether these particular items were received, how they were evaluated, and where they were incorporated into the assessment.

Showing that an Applicant carried out its own surveys does not answer whether contradictory or supplementary information supplied through consultation was taken into account.

For each of these pieces of evidence the Applicant should be able to state: whether it was received; who reviewed it; whether it altered the baseline; whether it was accepted

or rejected; if rejected, why; and where that reasoning appears in the ES or Consultation Report.

That audit trail is largely absent from the Applicant's response.

## 5. Need, grid connection and BESS

The Applicant gives one of its fuller responses to the need case. It relies upon EN-1's general national need provisions, the Critical National Priority framework, projected electricity demand and the proposition that regional Clean Power capacity figures are not caps. It also states that the solar Scheme has been prioritised through connections reform and that the BESS would be resubmitted to a future prioritisation round after consent.

BEPS accepted the existence of general national need and questioned the weight attributable to the location-specific and storage-specific benefits claimed for this Scheme.

The Applicant's answer to the BESS point is particularly important because it confirms that the BESS does not presently have the same connection status as the solar generation and that the Applicant intends to seek a Gate 2 connection for the BESS through a future reprioritisation round (despite apparently not being eligible to apply for one).

That does not resolve BEPS's concern. It confirms the factual contingency which gave rise to it. The unresolved examination question is therefore not whether BESS is supported by national policy. It is what benefits can properly be attributed now to an element whose Gate 2 timing and progression remain future matters, and what Scheme scenario has been assessed if the solar generation is delivered before, or without, the BESS

## 6. DCO flexibility and deferred controls

The Applicant's response to BEPS-057 to BEPS-062 is substantial in length but does not fully engage with the distinction BEPS was drawing.

BEPS did not argue that Rochdale Envelope assessment is impermissible or that management-plan Requirements are inherently unlawful. Its objection was that, in a number of identified cases, later work appears necessary to determine whether an acceptable solution exists rather than merely to refine one.

The Applicant responds principally by explaining the Rochdale Envelope, identifying maximum parameters and listing the management plans and Requirements which

must be approved before relevant works occur. It also states repeatedly that this is a tried-and-tested DCO approach.

That establishes the existence of a control mechanism. It does not necessarily establish the adequacy of the underlying environmental information. The relevant distinction is whether a later document: refines implementation of an already demonstrated acceptable solution; or determines for the first time whether an acceptable solution exists.

The Applicant's own responses elsewhere show why the distinction matters. It confirms that later groundwater investigation will inform Foundation Works Risk Assessments; later Hydrogeological Risk Assessments may be required for trenchless crossings; final BESS system-specific modelling will occur after equipment selection; and detailed drainage and transport matters remain for later approval.

The response to the DCO criticism therefore deals more convincingly with enforceability than with evidential sufficiency.

## 7. Ecology: barbastelle

The Applicant's response to the barbastelle objection illustrates the risk of answering a different ecological question.

BEPS's argument concerned the functional maternity-colony landscape: overlapping Core Sustenance Zones, commuting and feeding networks, woodland relationships, hibernation habitat, lighting, noise and fragmentation.

In BEPS-012 the Applicant responds that much of the development is on intensively managed agricultural land (disputable) which is regularly disturbed by cultivation, pesticides, machinery and uncontrolled agricultural lighting, and argues that operational disturbance may therefore be less than under existing agriculture. It also relies upon retention and enhancement of boundary habitats.

That does not fully answer BEPS's functional-habitat point. A field can be intensively cultivated and still form part of the feeding or commuting resource of a maternity colony. The comparison between agricultural disturbance (LIMITED TIMES AND DURATION PER YEAR) and solar-farm CONSTRUCTION and disturbance does not establish that conversion to fenced arrays, tracks, inverters, substations and altered vegetation retains equivalent bat function.

Nor does retention of hedgerows, by itself, answer whether the adjoining foraging landscape remains functionally usable. The Applicant's response therefore establishes its mitigation theory but does not demonstrate the factual proposition required to validate it.

This has become still more important in light of the later Norfolk Barbastelle Study Group evidence and the Applicant's own final bat surveys, which demonstrate extensive barbastelle use of the Scheme landscape. That later evidence was not available in its final form when every RR response was drafted, but it means that the original BEPS question remains live rather than resolved.

## 8. White-clawed crayfish

This is one of the clearest examples of the Applicant not answering the point made. BEPS stated that Norfolk Rivers Trust evidence identified a breeding white-clawed crayfish population within the connected Tas catchment and within approximately 2 km of the Scheme, and argued that downstream works and crossings therefore required precautionary assessment.

The Applicant's response begins:

'No records of white-clawed crayfish have been identified within the Order Limits.'

It then refers to its habitat-suitability assessment, pollution controls and trenchless crossing measures, and states that a further technical note would be supplied. EN0110014-000562-8.8 The Applic...

The first sentence does not answer BEPS's objection. The objection concerned a breeding population in a hydrologically connected catchment outside the Order Limits and the consequences for downstream habitat and impact pathways.

The geographical distinction is material. An aquatic species does not need to be recorded inside the red line for works within the same connected watercourse system to affect it.

The later commitment to provide further technical material also demonstrates that the matter was not substantively closed by the RR response.

## 9. Botanical baseline

BEPS said that specialist botanical evidence identified the South Norfolk Claylands as an area requiring more detailed botanical investigation, particularly where haul roads, access works and vegetation removal were proposed. Alex Prendergast, a level 6 botanist, had written to East Pye Solar saying that two season surveys (minimum) needed to be carried out, especially in areas proposed for transport or road widening.

The Applicant responds by relying upon its desk study, habitat condition assessment and BNG work, noting that most development lies within intensively farmed land and stating that detailed traffic management will deal with visibility-splay vegetation works.

That answers the proposition that no ecological information exists. It does not answer whether the survey effort was sufficient to identify rare botanical assemblages in the specific verges, banks, roadside grasslands and access corridors liable to disturbance.

The issue is particularly important because BNG condition surveys and botanical species surveys do not necessarily answer the same question. A BNG habitat-condition assessment is not automatically equivalent to a specialist survey designed to detect locally rare plant assemblages.

That distinction remains insufficiently addressed.

## 10. HRA and hydrological connectivity

BEPS argued that hydrological connectivity had been acknowledged but impact propagation had not been demonstrated sufficiently, and that the no-likely-significant-effect conclusion therefore relied too heavily on mitigation and incomplete baseline information.

The Applicant responds that embedded pollution and runoff controls are secured and that Hydrogeological Risk Assessment will be undertaken for relevant trenchless crossings if required. It also relies upon Natural England's then position on the Shadow HRA.

If a later Hydrogeological Risk Assessment is required to understand a crossing interacting with a Principal or Secondary A Aquifer, surface watercourse or sensitive ecological receptor, the ExA still needs to understand whether that assessment merely selects controls for an already acceptable crossing or could determine that the crossing method or alignment is environmentally unacceptable.

The RR response does not make that distinction.

## 11. Water Framework Directive

BEPS's concern was that WFD compliance depended upon incomplete hydrogeological and ecological information. The Applicant answers that the WFD Assessment is based upon information available when the application was made and 'will be kept under review' as new information and assessments become available during future design.

That response does not rebut BEPS's factual point. It confirms that the WFD assessment remains capable of change in light of future information. The examination question therefore becomes how material that future information could be.

Future work could change the identification of pathways, receiving waterbodies, affected receptors or compliance conclusions, the present assessment requires closer scrutiny.

## 12. Private water supplies and hydrogeology

BEPS's RR asked for receptor-specific analysis of private water supplies, including wells, boreholes, source aquifers and potential contamination pathways.

The Applicant responds by identifying pollution controls, impermeable drainage beneath BESS/substation areas and future Hydrogeological Risk Assessments. It then expressly records that, following discussion with the Environment Agency, intrusive ground investigation would not be required to support the ES and would instead be carried out post-consent, with Foundation Works Risk Assessments and relevant hydrogeological assessments undertaken later.

This is not an answer that demonstrates the baseline is complete. It explains why the Applicant considers post-consent investigation acceptable.

The original BEPS criticism was not simply 'there is no Requirement requiring investigation'. It was that the later investigation may establish the source-pathway-receptor model upon which the no-significant-effect conclusion depends.

The Applicant's response therefore confirms rather than removes the need for the ExA to examine the distinction between verification and determinative investigation.

That concern is now independently reinforced by the Environment Agency's RR response.

## 13. Site selection and Great Moulton

BEPS argued that Great Moulton was selected through a grid- and land-led process after the original Norwich Main premise changed, and questioned whether environmental suitability was genuinely reconsidered.

The Applicant repeatedly refers to the Site Selection Assessment, national policy, Horlock Rules and the factors it says were considered, including grid proximity,

accessibility and environmental constraints. That describes the Applicant's methodology but does not fully answer the chronology which BEPS identified.

The important question is not simply whether environmental criteria appear in the Site Selection Assessment. It is whether the change in grid connection location caused the earlier land portfolio to be reconsidered on the new spatial premise, and whether Great Moulton was independently compared with reasonable alternatives using equivalent criteria.

The ExA's own ExQ1 questions on the change from Norwich Main to Great Moulton demonstrate that this issue remains live.

The RR response should therefore be treated as a statement of the Applicant's position, not as resolution of the objection.

## 14. Soils, BMV land and reversibility

The Applicant's response to BEPS's BMV objection relies principally on Chapter 15 and the Outline Soil Resource and Management Plan. It disputes BEPS's land-area characterisation and states that most effects are temporary and reversible.

That is partly substantive, because it identifies the Applicant's land calculations and environmental conclusion.

However, when BEPS raises the specific risks of long-term compaction, repeated maintenance, construction compounds, cabling, piling and restoration, the Applicant largely refers back to Chapter 15 and says that good soil management will be secured through the SRMP.

That does not establish the claimed reversibility independently of the management plan. The question remains whether the reasonable worst-case soil damage from repeated construction and replacement cycles has been quantified and whether the restoration outcome is evidenced rather than assumed.

## 15. Decommissioning and the relationship with BNG

The Applicant's response to BEPS-027 and BEPS-028 is particularly important. BEPS asked how restoration to agriculture could be reconciled with BNG habitats created during the 60-year operational period.

The Applicant states that, apart from National Grid and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to landowners. It then states that post-decommissioning landowners would choose how the land is used and managed. In response specifically to the BNG point, it states that the landowner may do as they wish subject to any other environmental agreements and that the Applicant

‘cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.’

That does not answer the BEPS concern. It materially strengthens it.

If the Applicant cannot ensure that habitat relied upon for the claimed BNG survives decommissioning, then the Examination needs to know what duration of ecological benefit the BNG metric assumes and what part of the claimed gain is actually secured beyond the operational period.

This issue now requires explicit reconciliation between Requirement 9, the BNG metric, the LEMP, the DEMP and the agricultural restoration case.

## 16. Heritage

The Applicant’s heritage responses are more detailed than many of its responses on other topics, but the disagreement remains materially unresolved because the Applicant relies heavily on the existence and general adequacy of its heritage assessment without fully engaging with the difference between methodological adequacy, EIA significance and policy harm.

BEPS argued that the ES treats the historic environment too atomistically, scopes out too many assets and places excessive reliance on visibility and screening rather than the contribution made by openness, historic land use, approaches, group relationships, tranquillity and the wider agricultural landscape. The Applicant generally responds by referring back to Chapter 10, the Heritage Statement, the Archaeological Desk-Based Assessment and the assessment methodology it says was developed through consultation.

The Applicant also relies on Historic England’s Relevant Representation, particularly Historic England’s statement that, based on the available information, the Applicant had provided ‘an appropriate assessment of the location, type and significance of designated and non-designated heritage assets’ and that a ‘robust approach to mitigation’ had been proposed. That is relevant and should be acknowledged. It shows that Historic England did not consider the application heritage assessment to be fundamentally unusable or methodologically defective as a whole.

However, Historic England’s RR does not support the broader conclusion that the Applicant appears at times to draw from it, namely that the heritage effects are substantially resolved or that the Applicant’s findings of no significant residual effect can simply be accepted without further scrutiny.

Historic England expressly states that its primary concern is the effect of the Scheme on the significance of designated heritage assets and their settings, and that it would

provide further comment on those matters during the Examination. It identifies as its main built-heritage concerns the settings of one Scheduled Monument, two Grade I listed buildings, two Grade II\* listed buildings, 42 Grade II listed buildings and four Conservation Areas.

That is itself important. Historic England was not saying that heritage effects were confined to the very small number of assets to which the Applicant attributes policy harm. It identified a much wider group of designated assets whose settings required examination. More importantly, Historic England expressly states:

‘Historic England recognises that as a result of this project there are going to be changes to the setting of designated heritage assets. In some cases, these changes would result in a significant effect. This is likely to equate to harm to the significance of these assets in Policy terms.’

It then states that mitigation is likely to reduce the level of impact and heritage harm, but that **‘residual effects are likely to remain.’**

That qualification is central and should not be lost.

Historic England’s position is therefore materially more nuanced than a simple endorsement of the Applicant’s Chapter 10 conclusions. It anticipates policy harm, significant effects in some cases and residual effects after mitigation.

The Applicant’s RR responses do not adequately reconcile those propositions with its own presentation of the heritage case.

In particular, an EIA conclusion that an effect is not significant is not equivalent to a finding that no heritage harm exists. Historic England’s RR expressly links changes in setting to harm to significance in policy terms. The Applicant’s responses should therefore distinguish clearly between:

- EIA significance;
- harm to the significance of a designated heritage asset in policy terms;
- the degree of that policy harm;
- and the residual harm remaining after mitigation.

That distinction is especially important because Historic England’s RR indicates that residual harm is likely to remain even after the proposed mitigation is implemented. \

The Applicant’s response also does not fully engage with Historic England’s stated concern about cumulative effects. Historic England identifies the cumulative impact of East Pye Solar together with Tasway Energy Park and associated BESS projects as a ‘potential area of concern’ on which it intended to provide further \ That is relevant to BEPS’s wider criticism that the heritage assessment considers assets and effects too discretely and does not sufficiently address the cumulative transformation of the historic rural landscape.

There is also an unresolved issue concerning the Cable Route Corridor. Historic England states that it would comment further on the methodologies and mitigation strategy for the CRC because this was ‘likely to be an area of concern’. The Applicant’s responses therefore cannot properly present Historic England’s position as general support for the heritage case without also acknowledging these expressly reserved concerns.

Historic England’s RR further confirms that archaeological evaluation remains incomplete. It states that certain areas within the Order Limits have not been fully assessed through archaeological evaluation and that previously unknown archaeological sites of equivalent value to designated heritage assets could still be identified. Historic England therefore calls for DCO provisions requiring further evaluation before commencement, revision of the impact assessment where necessary and proportionate mitigation.

That point directly supports one of BEPS’s concerns about deferral.

The Applicant’s responses explain that archaeology will be managed through Requirement 12, the Outline Archaeological Mitigation Strategy, later evaluation and written schemes. That may provide a control mechanism, but it does not demonstrate that all relevant archaeological baseline information is already known. Historic England itself confirms that there remains potential for previously unknown remains of very high significance to emerge.

The distinction is therefore the same one that arises elsewhere in the application: whether later work merely refines mitigation for a known effect or may materially alter the understanding of the receptor and the assessment of harm.

Historic England’s RR also strengthens BEPS’s concern that mitigation should not be equated with elimination of harm. Historic England says mitigation may reduce the level of impact but that residual effects are likely to remain. This is important where the Applicant relies heavily on planting and screening. If the harm arises from alteration of openness, historic land use, approach, group relationships or the agricultural character of setting, planting may reduce visual exposure without restoring the contribution made by the original setting.

The independent Edelston HIA makes that methodological difference still clearer. Edelston identifies a substantially wider group of designated assets experiencing less-than-substantial harm and gives greater weight to openness, historic agricultural relationships, approaches, group value and seasonal intervisibility.

The appropriate Examination task remains to reconcile three distinct positions:

- the Applicant’s Chapter 10 and Heritage Statement conclusions;
- Historic England’s position that the assessment is generally appropriate but that policy harm and residual effects are likely to remain for a wider group of designated assets;

- and Edelston's independent conclusion that substantially more designated assets are harmed, including highly graded assets, with avoidance preferable in certain locations.

That reconciliation should be carried out asset by asset in the consolidated heritage schedule requested by the ExA, with separate columns for EIA significance, policy harm, mitigation and residual effect. Only then can the heritage effects be weighed consistently and transparently in the planning balance.

## 17. Landscape and visual effects

The Applicant responds more directly to BEPS's criticism of seasonal visual evidence. It states that the LVIA contains both summer and winter photography, that winter photography represents a reasonable worst case, and that viewpoint selection was undertaken through desk work, field survey and consultation with South Norfolk Council.

The BEPS disagreement is therefore not principally whether winter photographs exist. It is whether winter photography is provided for all views – it is not. It is also whether the selected viewpoints and receptor methodology adequately capture the sequential, cumulative and lived experience of a development dispersed across ten site groups.

That narrower issue remains and should be stated in those terms rather than repeating a criticism which the Applicant has factually answered.

## 18. Transport and access

The Applicant's transport responses illustrate both substantive engagement and continuing deferral. BEPS argued that the extensive use of holding areas, one-at-a-time HGV release, marshals and internal haul roads evidences a highly constrained local road network. The Applicant disagrees and says those measures demonstrate proactive mitigation rather than infeasibility.

In relation to Hall Lane and AIL movements, the Applicant states that NCC had confirmed the bridge could accommodate the size and weight of the proposed AIL vehicles. That is a specific factual answer capable of verification and should be checked against NCC's current examination position.

For the wider AIL route, the Applicant acknowledges that some local roads are required and that final route planning and traffic management will be undertaken later by specialist haulage contractors in consultation with NCC.

The unresolved issue is therefore whether later traffic management merely controls an already demonstrated route, or whether final feasibility, physical interventions and associated environmental effects remain to be determined.

The Applicant's responses do not always maintain that distinction.

## 19. PRow

The Applicant's responses generally treat PRow effects through the Outline PRowPPMP, construction controls and later management.

BEPS's objection is broader: the Scheme may preserve a legal line while materially changing its practical usability through fencing, enclosure, crossings, construction interaction and the loss of the open rural experience.

To the extent that the Applicant answers by stating that routes remain open or that later management plans will address interactions, the response does not fully engage with that experiential and functional point.

This is now reflected in the ExA's own questions concerning sequential PRow effects and design.

## 20. BESS safety

The Applicant's BESS responses are amongst the most substantive in EXAM/8.8. It explains the Outline BSMP, fire testing, plume modelling, emergency response requirements, minimum distances and consultation with Norfolk Fire and Rescue Service and the Environment Agency. It also explains why final system-specific risk assessment, Large Scale Fire Testing, consequence modelling and emergency planning can only occur once the final BESS design is selected.

However, this simultaneously confirms the central residual issue. Final system-specific safety conclusions are not yet available because the technology and configuration have not been fixed.

The examination question is therefore not whether the Applicant has a safety process; it plainly does. It is whether the present reasonable worst-case assessment is sufficiently conservative that the later system-specific work merely verifies compliance, rather than discovering a need for materially different spacing, suppression, containment, layout or emergency arrangements.

That issue remains unresolved by the RR response and is now expressly reflected in ExQ1.

## 21. Ground conditions and contamination

The Applicant repeatedly directs BEPS to the Phase 1 Ground Conditions Assessment and to future ground investigation, Foundation Works Risk Assessment and Hydrogeological Risk Assessment.

BEPS's point was that intrusive work may determine whether contamination and groundwater pathways actually exist.

The Applicant's response confirms that the Conceptual Site Model will be refined and that intrusive work will occur post-consent.

That is not the same as demonstrating that intrusive evidence is unnecessary to the environmental conclusion. It establishes only that the Applicant considers deferral acceptable.

The ExA's own Q1.16.1 and Q1.16.2 now identify precisely the outstanding distinction.

This is therefore an example where the RR response cannot reasonably be recorded as having resolved the issue.

## 22. Aviation

BEPS raised Tibenham Airfield, emergency landing, glare and the relationship between aviation constraints and site selection. The Applicant responds by pointing to its Glint and Glare Assessment and High Level Investigative Report and stating that significant impacts are not predicted.

Subsequent ISH1 evidence from the General Aviation Awareness Council developed the objection materially beyond glint and glare, particularly in relation to EFATO and glider launch failure. The ExA has now included aviation in ExQ1.

## 23. Cumulative effects

BEPS's cumulative-effects objection was that the application treats projects and receptors too discretely and does not adequately represent the geographical and sequential burden of multiple energy and transmission schemes upon the same landscape, communities, water systems and infrastructure.

The Applicant generally refers to Chapter 19 and its cumulative methodology. That demonstrates that a cumulative assessment exists. It does not automatically answer the criticism of its scope, selection of schemes, spatial representation and treatment of receptor interactions.

The response would have been more useful had it identified, project by project, why schemes raised by BEPS were included, excluded or given particular status and then shown the combined effect upon each receptor.

Part 5 similarly provides thematic responses to cumulative-effect concerns, but because it groups large numbers of representations together it does not resolve BEPS's project-specific criticisms merely by restating the Applicant's general methodology.

## 24. Cross-reference as an answer

A recurrent feature of EXAM/8.8 is the phrase 'the Applicant refers to its response to...' or a direction back to an APP document. The problem arises where the document referred to is itself the subject of the objection.

For example:

BEPS says Chapter 15 does not quantify lasting soil harm; the response says the matters are addressed in Chapter 15.

BEPS says Chapter 9 does not adequately characterise hydrological pathways; the response directs BEPS to Chapter 9 and later controls.

BEPS says the Site Selection Assessment does not demonstrate a proper Great Moulton-centred reassessment; the response directs BEPS to the Site Selection Assessment.

BEPS says the HRA has not adequately applied hydrological connectivity; the response repeats the Shadow HRA conclusion and mitigation.

BEPS says the DCO defers matters whose environmental acceptability remains uncertain; the response lists the Requirements through which those matters will later be approved.

In each example, the Applicant identifies where its case can be found but does not necessarily answer the criticism of that case.

The ExA should therefore distinguish between a **document reference** and a **substantive response**.

## 25. Matters which the Applicant has substantively answered

For balance, BEPS considers that a number of its points have received genuine answers even though disagreement remains.

These include clarification of the present number and type of substations; the Applicant's interpretation of national need policy; confirmation that the BESS would seek Gate 2 in a future reprioritisation round; the Applicant's explanation of the Rochdale Envelope and DCO control structure; particular factual transport responses including Hall Lane; and significant additional detail concerning BESS fire safety and the proposed later system-specific safety process.

BEPS's Deadline 1 response should not continue to argue that those matters were simply ignored. The stronger approach is to identify what the Applicant has now clarified and then isolate the narrower question which its clarification leaves unresolved.

## 26. Matters which have been misunderstood or answered too narrowly

A second category consists of responses which engage with the subject matter but not with the proposition BEPS actually advanced.

The strongest examples are:

- answering a functional barbastelle-habitat objection by describing the existing agricultural disturbance of the fields;
- answering evidence of white-clawed crayfish in a connected upstream catchment by stating that none were recorded inside the Order Limits;
- answering consultation-stage informational sufficiency by pointing to the later Environmental Statement;
- answering hydrogeological baseline uncertainty by identifying the later risk assessments which will examine it;
- answering a question about whether an acceptable solution has been demonstrated by explaining that a management-plan Requirement will require a solution later;
- answering the permanence of BNG by stating that future land use after decommissioning is for landowners;
- and answering a challenge to the scope of an existing assessment principally by referring the reader back to that assessment.

These should be identified as **partial or misdirected responses**, rather than non-responses.

## 27. Matters which remain substantively unanswered

On the material reviewed, the following questions remain materially unresolved notwithstanding the Applicant's RR responses:

1. What contemporaneous environmental analysis demonstrated that each targeted-consultation change did not produce materially different likely significant effects?
2. How were the particular consultation materials supplied by Norfolk Rivers Trust, the Norfolk Barbastelle Study Group and the specialist botanist assessed and incorporated or rejected?
3. Which later investigations simply verify existing conclusions, and which may still determine whether the proposed construction or drainage method is environmentally acceptable?
4. How can the WFD conclusion be treated as settled when the Applicant itself says the assessment will be kept under review as new information becomes available?
5. How does the Applicant demonstrate a complete private-water-supply and hydrogeological source-pathway-receptor model before intrusive investigation?
6. How is BNG retained through construction compounds, access, replacement cycles and decommissioning, and what part survives the return of land to agriculture?
7. What functional evidence demonstrates that the existing barbastelle maternity-colony network will remain viable after conversion of the surrounding landscape to solar infrastructure?
8. How has the connected white-clawed crayfish evidence been incorporated into the baseline and crossing assessment?
9. Why did the change from Norwich Main to Great Moulton not require a materially different site-selection exercise?
10. Which heritage assets experience policy harm even where the Applicant records no significant EIA effect, and how is that reconciled with Historic England and the later independent assessment?
11. Which transport routes and engineering solutions are already demonstrated to be physically viable, and which still depend upon later design or third-party agreement?
12. Which BESS safety assumptions represent a genuinely conservative assessed envelope and which remain dependent upon the final selected technology?

These are not simply repetitions of BEPS's RRs. Many are now reflected independently in ExQ1.

## 28. Relevance to consultation adequacy

The Applicant's RR responses are significant to the consultation issue because they reveal, retrospectively, the degree to which matters were already resolved or remained open.

The Applicant confirms that the WFD assessment will continue to be reviewed; ground investigation will occur post-consent; Foundation Works and Hydrogeological Risk Assessments will follow; final BESS system-specific analysis depends upon future technology selection; detailed traffic measures remain to be agreed; and post-decommissioning ecological land management cannot be dictated by the Applicant.

Those admissions do not establish that consultation was legally inadequate. They do, however, make it difficult to answer every earlier consultation concern merely by saying that the submitted ES is now complete.

The appropriate inquiry is issue-specific. Where later work is genuinely detailed implementation, it does not undermine the consultation process.

Where later work is still determining receptor presence, pathways, feasibility or the environmental acceptability of the solution itself, the ExA needs to consider whether consultees were previously given enough information to form an informed view and whether the Examination now requires further environmental information or additional procedural safeguards.

## 29. Suggested treatment by the Examining Authority

BEPS considers that the most useful way to resolve this issue is not to treat the existence of EXAM/8.8 as evidence that the RRs have been answered.

The Applicant should instead provide a short issue-resolution schedule for the principal disputed matters identifying: the BEPS representation number; the precise issue raised; whether the Applicant considers it resolved, partly resolved or disputed; the evidence relied upon; whether that evidence existed during statutory or targeted consultation; whether further investigation or design remains outstanding; whether the environmental conclusion could change as a result of that future work; and the DCO mechanism by which any necessary mitigation or alternative solution is secured.

Such a schedule would distinguish genuine disagreement from failure to engage and would substantially assist the Examination.

## 30. Conclusion

The Applicant has made a substantial administrative effort to respond to BEPS's Relevant Representations, and it would be inaccurate to say that the objections have simply been ignored. In several areas, useful new clarification has been supplied.

The more important finding is that the existence of a response does not correspond consistently with substantive resolution.

A considerable proportion of the responses fall into one of three categories: they direct BEPS back to documents whose adequacy was itself challenged; they answer a narrower proposition than the one raised; or they explain that the issue will be addressed through later survey, design, assessment or approval. Several responses therefore confirm the continuing uncertainty identified by BEPS rather than resolving it.

This is particularly clear in relation to groundwater and ground investigation, WFD review, private water supplies, ecological baseline work, white-clawed crayfish, barbastelle functional habitat, detailed BESS safety assessment, transport design, BNG durability and decommissioning.

The consultation issue should consequently not be reduced to the fact that the application passed the section 55 acceptance stage or that a full Environmental Statement was later submitted. The relevant question is whether the information made available at consultation was sufficient for consultees to form an informed view of the Scheme then proposed, and whether subsequent changes or later-discovered evidence required further consultation or further environmental information. Regulation 12 expressly frames preliminary environmental information in terms of what consultation bodies reasonably require in order to develop that informed view.

On the Applicant's own RR responses, a number of the matters identified by BEPS remain dependent upon work which had not been completed when consultation occurred and, in some cases, has still not been completed during the Examination. Those matters should therefore be treated as live examination issues rather than as objections resolved merely by cross-reference to the application documents.

## Appendix: Audit of the Applicant's Responses to BEPS Relevant Representations

### East Pye Solar NSIP EN0110014 | Comparison of RR-0200 with EXAM/8.8 and cross-check against EXAM/8.10

**Purpose and method.** This appendix audits every BEPS entry reproduced in Table 2.3 of EXAM/8.8 (494 entries, including the duplicated source identifier BEPS-394). Each row records the BEPS point, the Applicant's response, whether the response is substantive, a cross-reference, a narrower/misdirected answer, or merely a notation, whether materially new information is supplied, and whether the response actually resolves the issue. EXAM/8.10 has also been cross-checked by corresponding theme. "Answered" does not mean that BEPS accepts the answer or that the underlying issue is resolved; it means only that the Applicant supplied issue-specific reasoning or information. "Deflected / cross-reference" means the response principally directs the reader back to an existing application document or earlier response without addressing the identified deficiency in that material. "Misunderstood / narrower answer" means the response engages with the general topic but not the proposition actually raised. "Ignored / noted only" means there is no substantive issue-specific answer.

**Headline audit.** Of the 494 entries, 341 are classified as answered in a substantive sense, 131 as deflected or answered mainly by cross-reference, 12 as answering a materially narrower or different point, and 10 as noted or effectively unanswered. In many of the rows classified as 'Answered', the response nevertheless confirms reliance on post-consent investigation, detailed design, future approval or further evidence, so the final 'Resolution' column remains 'No' or 'Partly'. The table is therefore an engagement audit, not a tally of whether the Applicant's case is accepted.

**Source documents.** BEPS Full Relevant Representation (RR-0200); The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties (EXAM/8.8), Table 2.3; and The Applicant's Response to Relevant Representations Part 5: By Theme (EXAM/8.10).

**Table A1: BEPS entries BEPS-001 to BEPS-055**

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-001 | Block East Pye Solar (BEPS) is a community action group of concerned residents and businesses, covering the entire area of South Norfolk impacted by the proposed industrial-scale solar scheme, and the wider community beyond. BEPS objects to the East Pye Solar Scheme because its adverse effects are not marginal, temporary or capable of being adequately mitigated.                                                                                                 | The Applicant notes the Block East Pye Solar (BEPS) response and has provided detailed responses to the matters raised herein.                                                                                                                                                                                                                                                                                                                                                                                  | Ignored / noted only        | No material new information                 | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-002 | East Pye Solar would cause serious, and in several respects, unmitigable harm to protected species, hydrologically connected water systems, rural landscape character, heritage settings, best and most versatile agricultural land, residential amenity, aviation interests and affected communities. Those harms are not outweighed by any demonstrated need for this Scheme in this location or region....                                                                | 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)....                     | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-003 | Several of BEPS' objections are not merely matters to be weighed in the ordinary planning balance but are legal gateway issues. The applicant must demonstrate compliance with the Habitats Regulations, European Protected Species duties, Water Framework Directive obligations, Listed Building duties, EIA requirements and Compulsory Acquisition tests....                                                                                                             | Compliance with the Habitats Regulations 2017, European Protected Species duties, the Water Framework Directive, statutory heritage duties, the EIA Regulations 2017, and compulsory acquisition tests is demonstrated across the Planning Statement [APP-209], Policy Compliance Document [APP-210], Shadow Habitats Regulations Assessment [AS-036], the ES [APP-032 to APP-195], and the Statement of Reasons [APP-020]. Mitigation is secured through Requirements in Schedule 2 of the Draft DCO [AS-032]. | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-004 | BEPS therefore submits that the application should be refused development consent on account of the fundamental evidential, procedural and legal deficiencies identified in our full relevant representation (by email).                                                                                                                                                                                                                                                     | The Applicant disagrees with this view and has responded to BEPS' Relevant Representation in this document.                                                                                                                                                                                                                                                                                                                                                                                                     | Ignored / noted only        | No material new information                 | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                     | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-005 | No demonstrated need for this Scheme in this location or region. BEPS does not dispute the general national policy support for renewable energy. However, generalised national need is not the same as a demonstrated need for this particular scheme, of this scale, in this location, with these impacts. The applicant's own Statement of Need accepts that prioritised schemes already meet the relevant Clean Power 2030 regional solar capacity ranges for 2031- 5.... | Refer to Applicant's response in row BEPS-002 above. 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)....                                | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-006 | Furthermore, the Statement of Need also admits that the BESS element is only Gate 1 with no                                                                                                                                                                                                                                                                                                                                                                                  | A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The                                                                                                                                                                                                                                                                                                                                                                                                   | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but                                                                      | EPS confirms that the BESS will have to be submitted to a future Gate 2 reprioritisation round                                                                                                                        | \$2.4 Energy Need and Grid Connection - cross-checked as                                                                                                              |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                          | EXAM/8.10 cross-check                                                                                                                                  |
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|          | confirmed indicative connection date. NESO has already given gate 2 to three times the national BESS requirement for 2035 and has said that further allocations in future application windows are unlikely. The applicant nevertheless relies throughout the Statement of Need on the benefits of co-located storage, flexibility and affordability....                                                                                 | benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Paragraph 6.9.3 of the Statement of Need [APP-206] explains that "Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies...."                                                                                                                                                        |                                 |                                                     | the underlying evidential or merits dispute is not thereby resolved.                                                          | after consent. This is material new clarification and confirms that the BESS connection/timing remains contingent.                                                                                                                               | the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                    |
| BEPS-007 | The Scheme's harms are location-specific. The applicant has selected a dispersed, sensitive rural landscape containing high existing ecological value, hydrologically connected catchments, protected species constraints, heritage assets, aviation constraints, residential receptors and extensive high-quality agricultural land which has been managed for conservation using public money over many years....                     | The Applicant makes note of this response. The likely significant effects of the Scheme on the specific environmental receptors raised have been assessed on a topic-by-topic basis within the ES Volume 1 [APP- 036 to APP-056]. The Applicant's approach to site selection, including how the site meets the tests set out in NPS EN-1 and NPS EN-3, is demonstrated in the Site Selection Assessment [APP-215].                                                   | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                            | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-008 | BEPS' 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 general 'national need' or optionality for 'attrition'. It must prove that this particular scheme is needed here and that the harms can lawfully be mitigated. The application fails to do this.                                      | Refer to Applicant's responses in rows BEPS-002 and BEPS-005 above.                                                                                                                                                                                                                                                                                                                                                                                                  | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                                | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-009 | 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....                                                                                                                                               | The Applicant refers to its response to row BEPS-002 above. Further, Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035....                                                           | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                                | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-010 | Appearance of bias concerning DESNZ and Macquarie (100% owner of IGP/East Pye Solar). BEPS is seriously concerned by the appearance of bias arising from the Department of Energy Security and Net Zero's private meeting with Macquarie on 27 January 2025 in relation to regional transmission grid connections and a 'deep-dive' on this project (NESO FOI-25-240; DESNZ EIR2026 / 03951; IC-429 804-X4Y8)....                       | The Applicant does not agree that the matters raised give rise to an appearance of bias in the determination of the Application and the nature of the Scheme's grid connection. No evidence has been provided that the meeting concerned the merits of the Scheme's Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment....                                                                       | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                            | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-011 | 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....                                                                    | The Applicant notes this comments and refers to its response to BEPS- 010.                                                                                                                                                                                                                                                                                                                                                                                           | Ignored / noted only            | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                                | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-012 | European protected species and Habitats Regulations issues. The Scheme affects an area identified as being of exceptional importance for bats, including barbastelles. Their ecologists states it is of national importance. Barbastelles are European Protected Species and are particularly sensitive to habitat loss, severance, lighting, noise, disturbance and changes to commuting and foraging networks.                        | The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme design primarily utilises intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species....                                                                                                             | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                            | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-013 | The applicant's case does not adequately demonstrate that the Scheme can avoid harm to protected bat populations. BEPS is particularly concerned that the applicant has treated bat impacts as if they can be managed by retaining isolated hedgerows or applying generic buffers. That is not adequate in a landscape where multiple barbastelle maternity colony core sustenance zones overlap the scheme area and cable corridor.... | The Applicant refers to its response provided to BEPS-012.                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                                | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-014 | The Tas chalk-stream system also requires specific attention because evidence of white-clawed crayfish currently within the connected catchment, within 2KM of the scheme at Saxlingham Thorpe, fundamentally changes the ecological baseline. Despite the applicant being provided with this evidence from Norfolk Rivers Trust pre- application in December 2025, they have not included it in their application....                  | 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 6.9 – 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].... | Misunderstood / narrower answer | Yes - factual clarification / future work confirmed | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | BEPS relied on a breeding population in the connected Tas catchment; EPS answers that no records occur inside the Order Limits. That does not address downstream/upstream hydrological connectivity or the need for species-specific assessment. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                          |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-015 | The applicant's Habitats Regulations position is also disputed. The application appears to rely on a conclusion of no likely significant effects, despite hydrological and ecological connections across the Order Limits and downstream catchments. BEPS considers that the screening position is insufficiently precautionary and fails to grapple with impact pathways through watercourses, contaminated run-off, sediment, groundwater, construction disturbance and cumulative effects.... | 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]....                                                                                                                                      | Answered                        | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-016 | A level 6 botanist familiar with the South Norfolk Claylands wrote an open letter to East Pye Solar pre-application stating that the ancient landscape of the scheme area was home to vanishingly rare assemblages of botany and that at minimum two-season surveys should be carried out before the application was submitted. Many of the key botanical areas are ancient lanes or verges which are proposed for HGV traffic or lane/road widening, such as Hundred Way....                    | 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....                            | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-017 | BEPS submits that these are not ordinary planning balance matters. They engage strict legal protections. Given that the applicant fails to demonstrate, on robust evidence, that European Protected Species will not be unlawfully harmed and that there will be no adverse effects on protected sites or qualifying ecological interests, the Scheme cannot lawfully proceed.                                                                                                                   | The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP- 044] includes a detailed assessment of potential impacts from the Scheme on important ecological features; including European Protected Species, and protected sites and their qualifying features. The ES concludes, that following the implementation of embedded mitigation as detailed in Section 8.8, no likely significant effects have been identified in relation to Ecology and Biodiversity.                                                                           | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-018 | 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 notes this comment and refers to its response provided for BEPS-015.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Ignored / noted only            | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                      | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-019 | BEPS is particularly concerned about the River Tas, Hemphall Beck and associated chalk stream catchments, as well as the Waveney-linked drainage network and catchment at site 1 infrastructure hub. Chalk streams are rare and highly sensitive habitats. Harm to hydromorphology, water quality, flow, sediment balance and aquatic ecology may be difficult or impossible to reverse.                                                                                                         | The Applicant notes this comment and refers to its response provided for BEPS-015. The River Tas, Hemphall Beck and sensitive groundwater dependent ecosystems have been identified and assessed within ES Volume 1: Chapter 9 – Water Environment [APP-045]....                                                                                                                                                                                                                                                                             | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                |
| BEPS-020 | The Water Framework Directive issue is therefore central. The applicant must demonstrate that the Scheme will not cause deterioration in the status of any relevant water body and will not prevent the achievement of environmental objectives. BEPS does not consider that the application provides the necessary level of assessment, modelling or certainty....                                                                                                                              | The ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application being made and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.                                                                                                                                      | Misunderstood / narrower answer | Limited - mainly restates existing position         | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS describes the existing WFD assessment and says it will be kept under review as new information emerges. That confirms the assessment may change and does not establish that the current baseline is complete.                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-021 | There are also unresolved concerns about private water supplies. The assessment appears to identify potentially active supplies but does not provide a sufficiently robust, receptor-specific risk assessment of how construction or contamination could affect wells, boreholes or groundwater-fed supplies. This is a public health issue as well as an environmental issue....                                                                                                                | 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]. ce water drainage strategy ESS, National Grid and substations incorporates a ned with an impermeable to prevent the infiltration of the strata beneath in these detailed surface water design is secured through rement 11. nchless cable crossings interact with Princi... | Misunderstood / narrower answer | Yes - factual clarification / future work confirmed | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS lists embedded pollution controls and later hydrogeological work, but does not answer whether each private supply has been located, characterised by depth/source aquifer and assessed receptor-specifically.                      | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                |
| BEPS-022 | The Great Moulton infrastructure hub is a particular example of an unmitigable siting error. It would introduce major and effectively permanent grid infrastructure into an exposed rural plateau close to sensitive receptors, Tibenham Airfield, multiple private water interests and on the catchment of the Waveney chalk stream....                                                                                                                                                         | Factors considered in the site selection process are given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3....                                                                                                                                                          | Misunderstood / narrower answer | Some - fuller explanation or data                   | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS restates the generic Site Selection Assessment. It does not answer the specific question whether the Great Moulton hub was independently selected on environmental least-harm criteria after the point-of-connection change.       | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-023 | Contamination, former airfields and groundwater risk. The The Applic Scheme includes or lies close to areas with known or provided t potential contamination risks, including former military airfield land and other potentially contaminated sites. BEPS is concerned that the applicant has not adequately assessed whether construction activities could mobilise contaminants into groundwater, private                                                                                     | ant refers to its response o BEPS-422 to BEPS-430.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.21 Ground Conditions - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                         |
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|          | water supplies, ditches, streams or chalk aquifers.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                 |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                               |
| BEPS-024 | The risk is particularly acute where contaminated land, shallow groundwater, chalk geology, drainage works and sensitive water receptors coincide. A failure to undertake adequate site investigation and pathway analysis before consent would leave fundamental matters to be resolved later, when the principle of development had already been approved. BEPS objects to that approach. Contamination and water impacts must be assessed before consent, not deferred.                                        | The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP- 196] includes ground investigation as a mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA)....                                                               | Answered                        | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-025 | Best and most versatile agricultural land and soil harm. The Scheme would remove a very large area, 2700 acres, of grade 2 and grade 3a Best and Most Versatile agricultural land from productive use for 60 years. BMV land forms approximately 80% of the scheme (the cable corridors have not been assessed). BEPS objects to the applicant's treatment of this harm as reversible, adequately mitigated or in line with government policy.                                                                    | These matters are addressed fully in ES Volume 1, Chapter 15, Soils and Agricultural Land [APP-051]. The land quality has been assessed by detailed field survey and the results are set out in Chapter 15. The Chapter examines the construction methodology and concludes that only in specific and limited areas will the land quality be affected, in most case on a temporary and reversible basis. This is summarised in Table 15.14. The area within sites 1 – 10 and the BESS is 829ha (2,048 acres) as set out at Table 15.6.... | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-026 | Long-term solar deployment on BMV land can affect soil structure, drainage, compaction, agricultural viability, tenant farming businesses and future restoration prospects. The risk is greater where construction compounds, tracks, cabling, piling, substations, BESS infrastructure and repeated maintenance access are involved. Peer-reviewed research including that carried out on behalf of the Welsh Government shows that BMV land is particularly negatively impacted and can be permanently damaged. | All of these matters are considered in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The Welsh Government research referred to concluded that it is important to carry out good soil management to minimise and avoid adverse effects. An Outline SRMP [APP-204] and a detailed SRMP will be submitted and can be controlled by DCO Requirement.                                                                                                                                                                   | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-027 | so objects to the lack of certainty around ssioning and restoration. If the applicant cannot rate now what infrastructure will be removed, how ill be restored, how compaction will be remediated, land will be returned to agricultural productivity, e claimed reversibility of the Scheme is not proven.                                                                                                                                                                                                       | This comment is noted. The decommissioning of the Scheme has been assessed within the ES [APP-036 to APP-195]. Mitigation measures for the decommissioning phase is provided within the Outline DEMP [APP-198]. The Outline DEMP is designed with the objective of securing the relevant environmental mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the detailed DEMP....                                                                                 | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-028 | If the scheme is fully reversed back to original agricultural use then Biodiversity Net Gain claims need to be reassessed as new habitats must be destroyed to enable this.                                                                                                                                                                                                                                                                                                                                       | The Applicant refers to its response provided to BEPS-027. The land will return to the landowner to do as they wish providing they are compliant with any other environmental agreements they may have entered into. The Applicant cannot dictate what will happen to the land post- decommissioning when the Applicant no longer has an interest in the land.                                                                                                                                                                            | Misunderstood / narrower answer | Yes - factual clarification / future work confirmed | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS says post-decommissioning land use is for the landowner. That does not demonstrate that habitats used to claim BNG will survive decommissioning or remain as a Scheme-generated net gain.                                          | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-029 | The March 2026 Land Use Framework for England reinforces the importance of protecting productive agricultural land and food security. As around 80% of the land proposed for East Pye solar fields is BMV land, BEPS submits that this weighs heavily against the proposal and reinforces the need for a clear demonstration that poorer- quality or less harmful land is not available....                                                                                                                       | The areas of land in Sites 1 – 10 and the BESS are set out in Table 15.6, and the proportion of land of BMV quality for the solar PV array areas (Works No 1) are set out in Table 15.7 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. comments are noted. There will be only limited areas where there will be a permanent loss of agricultural land, as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP- 051], for permanent fixed infrastructure and for tree planting (Table 15.14)....      | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-030 | 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....                                                                                                       | 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....                                                                                                     | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-031 | The Scheme would industrialise a wide and tranquil rural landscape. Its impacts would not be confined to individual parcels of land but would be experienced cumulatively across villages, lanes, public rights of way, heritage settings and residential receptors....                                                                                                                                                                                                                                           | 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 methodology follows GLVIA3, a recognised industry standard. The Applicant disagrees with the assertion that the assessment relies on "limited or seasonally unrepresentative viewpoints"....                                  | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                    |
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| BEPS-032 | Residential amenity and business impacts are also understated. These include outlook, noise, construction traffic, glint and glare, loss of tranquillity, proximity to infrastructure, cumulative enclosure and the lived experience of residents whose homes and businesses would be surrounded or materially affected by the Scheme.                                                                                                                                                                          | A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Furthermore, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. The methodology follows appropriate industry standards....                                                                                                                      | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-033 | Aviation and cumulative infrastructure impacts. The Scheme raises unresolved aviation concerns, particularly in relation to Tibenham airfield and the siting of tall or visually intrusive infrastructure in areas where aviation safety, emergency landing, glare, distraction and operational constraints require careful assessment. BEPS does not consider that these issues have been sufficiently integrated into the site selection and alternatives assessment.                                         | The Applicant has specifically assessed Tibenham Airfield within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS- 029], and the High Level Investigative Report [APP-222] considering glint and glare and emergency landing. The assessments concluded that a significant impact (and therefore distraction and operational constraints) is not predicted. Factors considered in the site selection process is given in the Site Selection Assessment [APP-215].... | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-034 | The cumulative assessment is also inadequate. The applicant's presentation of other major energy and infrastructure projects as single dots on a map does not properly show their true landscape extent or cumulative relationship with East Pye Solar. BEPS is concerned that projects such as Tasway Energy Park and other energy infrastructure and housing projects have been treated inconsistently....                                                                                                    | 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]....                                                                                                                                                                                                                                                                           | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-035 | Consultation and procedural unfairness. BEPS objects to the adequacy of consultation. The Scheme evolved over time, with new parishes, residents and land interests brought into scope through targeted consultation. BEPS is concerned that affected people were not given a fair, accessible and complete opportunity to understand and respond to the true impacts of the Scheme.                                                                                                                            | The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions....                                 | Misunderstood / narrower answer | Some - fuller explanation or data                   | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS relies on overall statutory-compliance assertions and later application material rather than addressing what information affected consultees had when they were asked to respond.                                 | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-036 | We are concerned that the Planning Document maps for this scheme currently being posted around the area are different to those shown on the application, and are being placed miles from the areas shown, where landowners are unlikely to find them.                                                                                                                                                                                                                                                           | The Applicant confirms that the notices erected on site between April 2026 and June 2026 relate to the statutory notification requirements under Section 56 of the Planning Act 2008, which is required when the Secretary of State accepts an application for an order granting development consent. The plans accompanying these notices identified areas of unregistered land that interact with the Scheme, either directly or indirectly....                                           | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-037 | The application material is complex, voluminous and in some respects inaccessible to ordinary residents. Where key plans are difficult to interpret, depend on layered software access, or do not clearly show the true extent of impacts, consultation is undermined. Procedural fairness is not a formality. It is essential to the legitimacy of the DCO process. We have requested that a printed copy of the full application should be placed in local libraries so that the community can consult it.... | The Applicant acknowledges that there has been some misunderstanding over the potential use of compulsory acquisition powers over residential property. The Applicant provided further information regarding this matter in a letter to properties on the 24th July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes, gardens or buildings and this has never formed part of the project proposal....          | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-038 | 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....                                                                                                                                                                 | The Applicant notes the concerns raised regarding the approach to securing detailed matters through outline management plans and post-consent processes. The construction, operation and decommissioning of the Scheme have been assessed in the ES [APP-036] to [APP-195] on a reasonable worst-case basis in accordance with the 'Rochdale Envelope' approach, as set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038], which identifies the mitigation measures relied upon.... | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-039 | Overall planning balance and remedies sought. BEPS' summary position is that the Scheme fails the planning balance. The applicant has not demonstrated a compelling need for East Pye Solar in this location or region. It has not shown that less harmful alternatives have been properly assessed....                                                                                                                                                                                                         | The Applicant refers to its responses provided to BEPS-002 and BEPS-005. Further, the Applicant agrees with this representation in that more transmission solar is required in other locations to achieve the Government's Clean Power target. However, due to the urgent need for an unprecedented capacity of new low-carbon generation facilities, any other proposals are needed alongside rather than as an alternative to the Scheme....                                              | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-040 | BEPS submits that the application cannot lawfully progress further without further environmental information, corrected assessment, re-consultation where necessary, and enforceable safeguards sufficient to demonstrate compliance with all relevant legal gateway tests.                                                                                                                                                                                                                                     | The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. For this reason, the Applicant did not hold a further round of pre-application consultation....                                                                      | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                 |
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| BEPS-041 | Further information should not be used merely to patch evidential gaps after the principle of development has effectively been accepted. At minimum these should include lawful alternatives assessment, complete ecological (including botany, white-clawed crayfish and bat) surveys, a robust Habitats Regulations assessment, Water Framework Directive compliance assessment, hydrogeological and private water supply risk assessments, contamination pathway modelling, corrected cumulative assessment, wint... | The Applicant has set out the position on these matters in the responses provided above, and within the response to the full Relevant Representation below. For example, see BEPS-010.                                                                                                                                                                                                                                                                                                                            | Ignored / noted only            | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-042 | For the reasons set out in this summary and in the attached full representation (by email), BEPS submits that East Pye Solar is not an acceptable or lawful development. BEPS therefore asks the Examining Authority and the Secretary of State to refuse development consent. ehalf of Block East Pye Solar                                                                                                                                                                                                            | The Applicant disagrees with this comment. The Applicant considers that the DCO Application has been prepared in accordance with the Planning Act 2008, the EIA Regulations and the relevant National Policy Statements, as demonstrated in the Planning Statement [APP-209] and Policy Compliance Document [APP-210].                                                                                                                                                                                            | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                                 | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-043 | The consultation process was conducted on a shifting and insufficiently stable project, with real defects in coverage, reporting and access BEPS objects to the adequacy and reliability of the consultation process....                                                                                                                                                                                                                                                                                                | The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions....                                                       | Misunderstood / narrower answer | Some - fuller explanation or data                   | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS says evolving design is normal and relies on the later ES. The objection was whether the consultation-stage Scheme and PEIR were sufficiently stable and informative; the later ES cannot by itself answer that historic question.                                                | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-044 | There were also practical limitations on access to the full consultation material. The section 48 notice and section 46 notification state that hard copies of the PEIR and PEIR NTS could be requested only at a charge of up to £750, while other consultation materials were free. In BEPS's submission, for a project of this size and complexity, that plainly limited effective public access to the full environmental information.                                                                              | The Applicant considers that appropriate arrangements were put in place to ensure access to the consultation material. The charge of £750 referred only to the cost of producing a hard-copy set of the PEIR documentation, which comprised a substantial volume of material. It is not standard practice, nor reasonably practicable, for applicants to provide printed copies of the full suite of documentation free of charge....                                                                             | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | EPS supplies useful new facts about free electronic access, availability of individual hard copies, events and library access. This materially answers the factual access point, although BEPS may still dispute whether those arrangements were adequate for all affected residents. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-045 | The reliability of the Consultation Report and consultation record is also in doubt. In its 26 March 2026 response to PINS on consultation signposting, the applicant expressly admitted that Appendix 7 to the Consultation Report incorrectly identified Pulham Market Parish Council as 'Pulham St Mary Parish Council', describing this as a typographical error....                                                                                                                                                | The Applicant refers to its response provided under BEPS-043 regarding the adequacy of the statutory consultation. The Applicant has responded to PINS Section 51 Advice under Applicant's Response to Advice at Acceptance [AS-001]. As noted in this response, the Applicant confirmed that Pulham Market Parish Council was formally notified of the non-statutory Phase One consultation in October 2024, the statutory Phase Two consultation in June 2025 and the Targeted Consultation in October 2025.... | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                                                                     | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-046 | There is also evidence that consultation took place against a shifting scheme description. The consultation notices and section 46 material described the Scheme as including 'up to two 400kV substations'. Later, PINS identified inconsistency in the application documents as to whether the Scheme involved two or three 400kV substations. That inconsistency supports BEPS's wider submission that consultation was not carried out on a sufficiently stable and consistently described project....              | 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....                                                                                                                                                                                                   | Misunderstood / narrower answer | Yes - factual clarification / future work confirmed | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS clarifies the current Scheme envelope but does not explain the consultation-stage inconsistency in the number of 400 kV substations or what consultees reasonably understood at the time.                                                                                         | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-047 | The applicant's Section 55 checklist is revealing because it presents a clean compliance narrative that is materially at odds with the host authorities' formal Adequacy of Consultation Representations. In particular, the applicant states that it complied with Chapter 2 of Part 5 and refers to host-authority confirmation of consultation delivery, yet both Norfolk County Council and South Norfolk Council formally concluded that section 42 had not been complied with....                                 | The Applicant refers to its response provided under BEPS-043 regarding the adequacy of the statutory consultation. The acceptance of the Applicant's application for examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties....                                                                                                                                                                                                    | Misunderstood / narrower answer | Some - fuller explanation or data                   | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS relies on section 55 acceptance. Acceptance is a procedural gateway; it does not itself answer the factual criticisms of consultation coverage, information or host-authority adequacy representations.                                                                           | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-048 | Material ecological information provided to East Pye Solar and copied to the Planning Inspectorate pre-application has not been referenced or included in the ES submission: • A statement by Norfolk Rivers Trust that surveys within the last five years identify a breeding colony of white clawed crayfish within 2KM of the proposed scheme....                                                                                                                                                                    | The Applicant provided responses to feedback received at statutory consultation in the Consultation Report [APP-024]. A summary of responses received can be found in Chapter 12: Account of feedback and the Applicant's response to the statutory consultation of the Consultation Report [APP-024] and in more detail in Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-035]....                                                                                                    | Misunderstood / narrower answer | Some - fuller explanation or data                   | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS describes its general consultation-report and ecology process but does not provide an audit trail showing whether each item supplied by NRT/NBSG/the botanist was received, evaluated, accepted or rejected and incorporated into the ES.                                         | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-049 | Appearance of Bias A document on appearance of bias was submitted by BEPS to East Pye Solar with                                                                                                                                                                                                                                                                                                                                                                                                                        | The Applicant notes this comment and refers to its response provided to BEPS-010.                                                                                                                                                                                                                                                                                                                                                                                                                                 | Ignored / noted only            | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or                                                                                                                                                                                    | \$2.3 The Applicant - cross-checked as the corresponding                                                                                                              |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                             | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                        |
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|          | the request that it should be submitted with the DCO application. The document presents evidence of communications by Island Green Power to DESNSZ with regard to changing the regional targets for solar in the Clean Power 2030 Action Plan....                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                           |                             |                                   |                                                                                                                               | refers elsewhere to the point.                                                                                                                                                                                        | generic thematic response; no separate BEPS-specific determination is made there.                                                                            |
| BEPS-050 | Statement of Need The Statement of Need does not overcome the regional oversupply and proportionality problem As set [APP-20 BEPS objects to the applicant's Statement of Need importa because, although it sets out a broad national policy case for solar in general, it does not establish a convincing need Applicant no adve for this particular Scheme in this particular location....                                                                                                                  | The Applicant refers to its response provided to BEPS-002 and BEPS-005. out in the Planning Statement 9], having had regard to all nt and relevant matters, the has concluded that there are rse impacts of sufficient either individually or ively, that would mean the DCO not be made. The adverse identified are outweighed by the substantial benefits that would arise from ng low-carbon energy to meet ds identified in NPS EN-1. | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-051 | The applicant's answer is to argue that the Clean Power 2030 and 2035 ranges are not a cap and that a larger development pipeline is needed because of attrition and the desirability of optionality. BEPS does not dispute that the national policy framework does not impose a rigid national ceiling. However, the issue is one of regional necessity, proportionality and planning balance....                                                                                                            | The Applicant refers to its response provided to BEPS-002 and BEPS-005. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made....                                                                                  | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-052 | That is especially so here, because the Statement of Need The Applicant also admits that the BESS element has only secured only a provided to B Gate 1 prioritisation and that its indicative connection date has not yet been confirmed. The applicant nevertheless relies throughout the Statement of Need on the benefits of co-located storage, flexibility and affordability. If the BESS does not have a firm Gate 2 position, then a substantial part of the need case remains contingent....          | refers to its response EPS-002 and BEPS-005.                                                                                                                                                                                                                                                                                                                                                                                              | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-053 | As set out in the Energy Minister's Open Letter of 16 April 2026, government has expressly recognised a significant national surplus of battery projects progressing through connections reform, has warned of the risks this creates for system design, cost and queue management, and has identified the possibility of tighter treatment of Gate 1 battery projects in future windows. This means the East Pye BESS cannot be treated as a robust or settled component of the Scheme's public benefits.... | The Applicant refers to its response provided to BEPS-002 and BEPS-005.                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-054 | The Statement of Need also places considerable weight on the proposition that projects in the prioritised pipeline may not all be delivered, and that attrition means more projects should be allowed to progress. But that argument is too abstract and indiscriminate to carry substantial weight here. It says, in effect, that because some projects may fall away, this one should also be consented. That is not a site- specific need case....                                                         | The Applicant refers to its response provided to BEPS-002 and BEPS-005. Further, Section 5.3 of the Statement of Need [APP-206] provides evidence on attrition in the UK's energy scheme development pipeline. This demonstrates that attrition is not an 'abstract and indiscriminate' concept but is instead one which the Government has recognised and addresses through its national policy position....                             | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-055 | BEPS's position is therefore that the Statement of Need overstates what national policy does for the applicant. National policy establishes a general need for low carbon infrastructure, but it does not relieve the applicant of the need to justify this Scheme in this location. Here, the applicant's own evidence shows that the relevant regional capacity ranges have already been met by prioritised schemes....                                                                                     | The Applicant refers to its response provided to BEPS-002 and BEPS-005.                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |

Table A2: BEPS entries BEPS-056 to BEPS-110

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                                            |
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| BEPS-056 | This is particularly the case, as here, where East Pye Solar significantly relies on Compulsory Purchase Powers to acquire the land from private individuals in order to build the scheme at all. This raises questions of the impact on human rights, where land is taken by compulsory purchase for a project that it not required in a specific location....                                                                                                                                                       | ES Volume 1, Chapter 5 - Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] outline the approach to site selection undertaken by the Applicant....                                                                                                                                                                                                                                                                                                                                         | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-057 | The Draft DCO seeks powers and relies on deferred controls in a way that is not justified on the present evidence BEPS objects not only to the environmental effects of the Scheme, but also to the breadth of the draft Development Consent Order and the extent to which it relies on later approvals, later agreements, later licences and later management plans in order to make the Scheme appear implementable....                                                                                             | The Applicant refers to the response to BEPS-058.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-058 | Breadth of powers BEPS is concerned that the Order sought is broader than the present evidence justifies. This is not a case in which the applicant has demonstrated a fixed, fully evidenced and environmentally secure scheme and merely seeks the legal mechanism to authorise it. Rather, the DCO is being used to authorise a wide envelope while leaving many matters central to environmental safety, legal compliance and practical deliverability to later stages....                                        | The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent....                                                                                                                                                                                                                         | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-059 | Deferral of critical controls BEPS is concerned that many matters central to the Scheme's acceptability are left to later discharge of Requirements and other later approvals. The Explanatory Memorandum shows that numerous important matters are to be dealt with after consent through Requirements, including detailed design approval, battery safety management, the landscape and ecology management plan, the protected species mitigation strategy, the biodiversity net gain strategy, drainage details... | The Scheme's Acceptability The Planning Inspectorate's Advice Note Nine: Rochdale Envelope addresses the degree of flexibility that would be considered appropriate to deal with uncertainties associated with applications for development consent. The ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application, to address uncertainties as identified in the ES, and to allow for advancements in technology from now to the time of construction.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-060 | Contingent deliverability and later consents The applicant's own Consents and Agreements Position Statement reinforces this concern. It expressly states that the intention of the Planning Act 2008 is to encourage as many consents as possible to be 'wrapped up' within a DCO as a 'one-stop-shop', including through disapplication of other consenting regimes and replacement with protective provisions and subsequent approvals. In BEPS's submission, that approach requires close scrutiny....             | The Applicant notes this comment. As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217], this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs.                                                                                                                                                                           | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-061 | The same document states that some necessary agreements with consenting bodies remain under discussion and that the applicant is merely 'confident' the necessary agreements will be obtained before or during Examination in exchange for protective provisions. That is not the same as demonstrating that the Scheme is presently shown to be deliverable, adequately controlled and environmentally acceptable....                                                                                                | As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217], this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs. Please refer to the Applicant's response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable.                                                                 | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-062 | The applicant also seeks disapplication of separate regulatory controls on the basis that the relevant matters will already have been sufficiently considered and resolved if the DCO is made, particularly in relation to drainage, water resources and environmental permitting, and that they should not be the subject of further regulatory consideration because that would cause uncertainty and delay. BEPS objects to that approach....                                                                      | As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217], this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs. Please refer to the Applicant's response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable....                                                              | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-063 | Protected species licensing, including barbastelles ES Volume 3, BEPS is also concerned that the Draft DCO and associated Outline Protec Strategy [AP consents material do not confront the protected species the circumst licensing issue with the degree of specificity required by species lice the ecological constraints of this Scheme....                                                                                                                                                                      | Appendix 8.10 - ted Species Mitigation P-161 clearly sets out ances in which a protected nce would be required. The o acknowledges the ere it would be necessary mencement of the a licence has been ged by BEPS, 8(2) provides that the detailed protected species mitigation strategy must be substantially in accordance with the outline protected species mitigation strategy....                                                                                                                                          | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-064 | That generic treatment is inadequate in the context                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Applicant acknowledges the presence of Barbastelle                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Misunderstood /             | Some - fuller                               | No. The response                                                                                                              | EPS answers in terms of presence, CSZs and                                                                                                                                                                            | \$2.5 Scheme Description, Draft                                                                                                                                                                  |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                                            |
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|          | of BEPS's barbastelle case. The Natural England / PINS scoping material in the file set states, in general terms, that a separate protected species licence from Natural England or Defra may be required, and that where licence need is identified applicants should use Natural England's pre-submission screening service so that Natural England can review a full draft licence application and issue a Letter of No Impediment ('LONI'), thereby giving...                                                       | Bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species....                                                                                                                                                                                                                               | narrower answer             | explanation or data                                 | addresses a different or narrower proposition and leaves the actual objection outstanding.                                    | retained habitat, while BEPS challenged whether the maternity-colony network and functional commuting/foraging habitat had been mapped sufficiently to support licensing and avoidance decisions.                                      | DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                 |
| BEPS-065 | Overall position on the Draft DCO Finally, BEPS is concerned that the combined effect of the Draft DCO, the Explanatory Memorandum and the Consents and Agreements Position Statement is to normalise a high level of contingency, deferral and regulatory substitution. The applicant presents this as standard NSIP practice....                                                                                                                                                                                      | The Applicant notes this comment. The Applicant refers to its response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable.                                                                                                                                                                                                                                                                                                                                                       | Ignored / noted only        | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                      | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-066 | Funding, compulsory acquisition and financial security The Fundi sets out BEPS is further concerned that the applicant's Funding Statement does not provide the level of certainty that would financed d standard justify the extensive compulsory acquisition and related scale ene powers sought. The document states that the current estimated cost of the Scheme is approximately £1 billion to Britain. Th developme £1.05 billion, including construction, land acquisition and infrastru compensation costs.... | ng Statement [APP-021] that the Scheme is a privately envelopment, which is the model for delivering large- rgy infrastructure in Great is model enables the nt of essential low-carbon cture without reliance on public equire certainty and for that is to be expected that the financing will only be in place once the DCO is granted....                                                                                                                                                                                   | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-067 | The applicant has not adequately assessed the consequences for farm businesses if compulsory acquisition of freehold land is exercised. Compensation rights do not answer the planning question of whether established agricultural businesses remain viable once land is permanently taken....                                                                                                                                                                                                                         | The Applicant refers to its response to BEPS-068 for a justification for CA powers. In terms of the effects on farm businesses from the cable route construction, there will be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes.                                                                                                                                                           | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-068 | The Funding Statement also confirms that the applicant has already secured option agreements over the Sites making up the majority of the Order Limits, but says compulsory acquisition powers are still required 'to ensure that the Scheme can proceed without impediment.' BEPS objects to that approach....                                                                                                                                                                                                         | The Applicant confirms that East Pye Solar Limited has entered into option agreements with landowners. These agreements put in place legally binding obligations to lease land that is being proposed for solar panels, substations, energy storage and other associated development that is part of the Scheme. These agreements are industry standard and provide landowners with certainty and protection over the use of their land while securing development rights for the Scheme....                                    | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-069 | Although the Funding Statement says the Draft DCO includes an article preventing exercise of compulsory acquisition powers until the Secretary of State has approved a form of security from the applicant, that appears directed to compulsory acquisition compensation and not to the wider problem of long-term decommissioning, restoration, insolvency or abandonment risk....                                                                                                                                     | The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the DCO and will remain bound by the legally enforceable requirements of the DCO....                                                                                                                                         | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-070 | BEPS submits that insolvency or abandonment risk is plainly a relevant planning consideration for a 60-year project of this scale involving extensive buried infrastructure, substations, BESS, repeated replacement cycles and significant end-of-life liabilities. The applicant's own Funding Statement shows that final financing remains contingent and post-consent....                                                                                                                                           | The Applicant refers to its response to BEPS-069.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                    |
| BEPS-071 | Cross-cutting point on the Commitments Register BEPS notes that the applicant's Commitments Register expressly states that it 'is not a secured document' and serves only as a register intended to track commitments throughout to other purported securing mechanisms....                                                                                                                                                                                                                                             | The Commitments Register [AS-038] has been prepared in line with PINS guidance Nationally Significant Infrastructure Projects: Commitments Register and is used as a signposting tool to track commitments made by the applicant throughout the NSIP planning process, with such commitments then secured in other documents. The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003].... | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-072 | Ecology / BNG / protected species The Commitments Register shows that the ecology case depends heavily on future control documents and future ecological input rather than a fully resolved application- stage position. It relies on the Outline                                                                                                                                                                                                                                                                       | The Outline CEMP [APP-196], the Outline OEMP [APP-197], the Outline DEMP [APP-198], the Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP- 161] are designed with the objective of securing the relevant                                                                                                                                                                                                                                                               | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific                                                         |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                 |
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|          | PSMS, Outline LEMP, later ECoW attendance, task-specific method statements, seasonal restrictions, pre-decommissioning surveys and even an updated PSMS at the decommissioning stage....                                                                                                                                                                                                                                                                                   | ecological mitigation measures. The plans also set out monitoring and reporting arrangements to ensure mitigation measures remain effective. These outline management plans establish a framework for the details to be secured through the DCO Requirements....                                                                                                                                                                                                                                                   |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        | determination is made there.                                                                                                                                          |
| BEPS-073 | Water environment An assess The Commitments Register reinforces BEPS's concern that Environment is Volume 1, the water environment case depends on assumptions, Environment outline documents and later approvals rather than settled identify safeguards....                                                                                                                                                                                                              | ment of the Water provided within ES Chapter 9 – Water nt [APP-045], which also s mitigation measures. The anagement plans [APP-196 ] are designed with the of securing the relevant ntal mitigation measures set n the ES. These outline t plans establish a for the details to be secured he DCO Requirements....                                                                                                                                                                                                | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-074 | Transport and access / PRoW The Commitments Register shows that major elements of the transport case remain to be settled later through the final CTMP, OTMP and PRoWPPMP. It repeatedly states that routes, haul roads, trenchless crossing approaches, replacement-traffic controls, traffic caps and PRoW management will be addressed through later detailed versions of those documents....                                                                           | ES Volume 1, Chapter 11 - Traffic and Access [APP-043] and ES Volume 3, Transport Assessment [APP-174 to 177] presents an assessment of the Scheme on traffic and access. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for design flexibility....                                                                                                                                                                                      | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-075 | Noise and vibration The Commitments Register is relevant to noise because it records that the assessment of operational inverter noise could, on the assumptions applied, exceed LOAEL and NOAEL thresholds, and says that further mitigation could include quieter inverter models, acoustic enclosures, relocation, reorientation of plant or installation of barriers, subject to further detailed design....                                                           | The following commitments are included in the Outline OEMP [APP- 197]: • Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on PRoWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised. | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-076 | Cultural heritage / archaeology The Applic The Commitments Register is relevant to heritage not only both ES Volum because it lists numerous setbacks and planting measures Cultural Herit Volume 3, relied on as mitigation, but also because it confirms that Archaeolog geophysical survey, informative trenching, [APP-173], geoarchaeological assessment, excavation and watching briefs remain to be targeted or completed following detailed archaeology design.... | ant notes that as outlined in e 1, Chapter 10 – age [APP-046] and ES Appendix 10.6 – ical Mitigation Strategy further stages of ical works will be carried out cheme, including l survey. Informative will be undertaken within the areas of the Scheme not bject to previous trenching. It greed 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....             | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-077 | Soils and agricultural land The Commitments Register confirms that soil protection depends mainly on the Outline SRMP, later micro-siting and general good-practice controls on trafficking, timing and reinstatement. It does not convert the applicant's soils case into quantified, durable safeguards dealing with the long-term effects of compaction, repeated access, replacement cycles and restoration certainty....                                              | Soil, as a resource, is assessed within ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Measures for the management and handling of soils, including the reinstatement of soils, are described in the Outline SRMP [APP-204]. With the exception of the National Grid Substation and Grid Connection Infrastructure, the soil and land conditions will be returned to its original use and condition as far as practicable....                                                                    | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-078 | Ground conditions The Commitments Register is particularly relevant to ground conditions because it states that intrusive ground investigations, UXO follow-up, foundation works risk assessments and hydrogeological risk assessments for trenchless crossings may all be undertaken post-consent or prior to construction....                                                                                                                                            | 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)....                                        | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-079 | Major accidents and disasters / BESS The Commitments Register reinforces BEPS's major-accident concerns by showing that the BSMP, emergency response planning, utility easements, later detailed design and post-consent investigations sit at the centre of the mitigation case....                                                                                                                                                                                       | ES Volume 1, Chapter 18 - Other Environmental Matters [APP- 053] presents an assessment of the Scheme on major accidents and disasters and identifies relevant mitigation and control measures. The Outline Battery Safety Management Plan(Outline BSMP) [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios....                                                                                      | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-080 | Waste / decommissioning / temporary nature The Commitments Register is also relevant to BEPS's decommissioning and restoration concerns. It shows that decommissioning will depend on a future detailed DEMP, future SWMPs, future authorised reprocessors and future market conditions, and it confirms that National Grid substation and grid connection infrastructure are not proposed to be decommissioned....                                                        | Mitigation measures for the decommissioning phase are provided within the Outline DEMP [APP-198]. The Outline DEMP is designed with the objective of securing the relevant environmental mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the detailed DEMP....                                                                                                                                                                        | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-081 | Potential Main Issues for Examination Document. The concern with the Non-Technical Summary                                                                                                                                                                                                                                                                                                                                                                                 | The Non-Technical Summary [APP- 194] summarises the findings of the Environmental Statement in a form                                                                                                                                                                                                                                                                                                                                                                                                              | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but                                                                      | The Applicant gives an issue-specific explanation or factual position. This is a substantive response,                                                                                                                                 | Relevant thematic section in EXAM/8.10 - cross-checked as                                                                                                             |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit classification            | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                         |
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|          | (NTS) is not merely that it is simplified, but that its simplification mirrors the underlying weakness of the application as a whole....                                                                                                                                                                                                                                                                                                                                                                   | accessible to interested parties, in accordance with the EIA Regulations. See responses provided herein regarding the content of the ES....                                                                                                                                                                                                                                                                                                                                                                                   |                                 |                                                     | the underlying evidential or merits dispute is not thereby resolved.                                                          | although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                                                                                         | the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                           |
| BEPS-082 | Habitats Regulations Assessment Habitats Regulations Assessment – Summary of Objection<br>The applicant's conclusion that the Scheme will have no likely significant effect on European sites is not supported by sufficient evidence and is not legally robust. The Scheme affects a dense and interconnected network of watercourses across the Order Limits and cable route corridor....                                                                                                                | The European Sites are located at a distance from the Scheme and are situated at a higher elevation, and/or are within a different catchment such that no hydrological connectivity has been identified....                                                                                                                                                                                                                                                                                                                   | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-083 | The assessment is further undermined by its acknowledged limitations. It is a habitat-led appraisal only, with no direct species surveys, undertaken during unusually dry conditions, with many watercourses dry or only partially flowing at the time of survey. Ephemeral ditches and headwaters—despite being recognised as potentially important seasonal pathways for aquatic organisms—are not fully assessed....                                                                                    | The aquatic ecology assessment adopted a habitat-led approach, informed by the availability of appropriate desk study records, as set out within ES Volume 3: Appendix 8.9 – Aquatic Habitat Assessment [APP- 160]. The Aquatic Habitat Assessment explicitly acknowledged that surveys were undertaken during a period of unusually dry conditions and identified this as a limitation of the baseline dataset. However, the assessment did not rely solely on the presence or absence of water during the survey period.... | Answered                        | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-084 | The appendix also confirms the presence of clear impact pathways, including sediment release, pollution events, changes to flow and drainage, and disturbance associated with construction works. It further recognises that the River Tas waterbody already contains failing Water Framework Directive elements, and that deterioration must be avoided....                                                                                                                                               | The Applicant refers to its response to BEPS-082                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-085 | Figure 8.1 demonstrates that the Order Limits lie within 10 km of multiple European sites including The Broads SAC/Broadland SPA/Ramsar and Norfolk Valley Fens SAC. However, the Applicant treats this as a simple distance-based assessment. This is fundamentally flawed. The Site lies within a hydrologically connected landscape, including the River Tas chalk stream system, and Broome Beck, which drain into the River Yare and the Broads SAC, and the river Waveney chalk stream catchment.... | The Applicant refers to its response to BEPS-082 which sets out the reasoning for the 10km buffer.                                                                                                                                                                                                                                                                                                                                                                                                                            | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-086 | Failure of Habitats Regulations Screening The Applicant has not lawfully screened out likely significant effects on European sites. The problem is not simply one of missing detail. It is that the evidence now available shows clear and plausible pathways by which East Pye Solar may affect the integrity of European sites, yet the assessment continues to rely on distance, generic mitigation and incomplete baseline evidence....                                                                | The Applicant refers to its response to BEPS-082. The Broads SAC and Broadland Ramsar lies within the Yare (Wensum to tidal) WFD waterbody catchment. The Norfolk Valley fens SAC lies within the Tributary of Tas WFD waterbody catchment. Although these catchments are not directly assessed in the ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] the assessment considers impacts to all WFD waterbody catchments which lie between the Order Limits and these WFD water bodies....          | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-087 | That concern is reinforced by the hydrological evidence. East Pye lies within a chalk-stream landscape, including the River Tas system, with downstream connectivity towards the River Yare and the Broads. Norfolk Rivers Trust surveys has confirmed a breeding population of white-clawed crayfish within 2KM upstream at Saxlingham Thorpe in the connected chalk-stream system....                                                                                                                    | 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]. some detail on impacts to ed crayfish, the Aquatic sessment identified no white-clawed crayfish within and concluded that itability within the surveyed es was low....                                                                                                                                   | Answered                        | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-088 | The bat evidence creates a second, independent pathway of concern. The ES bat material records multiple barbastelle maternity colonies within 2 km of the Order Limits, including Brooke Wood, Shotesham-Woodton Hornbeam Woods SSSI, Tyrrells Wood SSSI and Saxlingham Grove, with colony roost zones and CSZ overlapping the entire Site....                                                                                                                                                             | No SACs are designed for bats within 34km of the Site, so the local barbastelle population not considered relevant in the HRA process. A full assessment of the likely effects to local barbastelle populations is found in is not considered in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].                                                                                                                                                                                                                 | Misunderstood / narrower answer | Limited - mainly restates existing position         | No. The response addresses a different or narrower proposition and leaves the actual objection outstanding.                   | EPS answers that no SAC within 34 km is designated for bats. That is narrower than BEPS's functional-habitat argument and does not address the species-level protected-species assessment or wider ecological function.                | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-089 | Habitats Regulations screening is concerned not only with direct land-take from a European site, but with effects on the functional habitat that supports qualifying species populations. On the evidence now available, East Pye is not simply near European sites: it is embedded in the wider habitat system that supports their ecological function....                                                                                                                                                | The Applicant refers to its response to BEPS-088.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Deflected / cross-reference     | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-090 | The position is made worse by the incompleteness of the evidence base. The Scoping Opinion required hydrological matters, WFD, private water supplies and designated-site effects to be addressed rather                                                                                                                                                                                                                                                                                                   | Section 3 of the Shadow Habitat Regulations Assessment (shRA) Report [AS-036] acknowledges the Scoping Opinion and Section 4 addresses the potential for hydrological pathways and designated site effects.                                                                                                                                                                                                                                                                                                                   | Answered                        | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not                   | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS                                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific                                            |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                  | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                               |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | than scoped out. Yet the application materials and supporting objection record show repeated reliance on future work, habitat-led appraisal, outline management and generic mitigation rather than a completed, site-specific demonstration that likely significant effects can be excluded....                                                                                                                                                                                  | The Applicant's stance on the process and justification of scoping out the ecological related matters is considered valid.                                                                                                                                                                                                                     |                             |                                   | thereby resolved.                                                                                                             | representation.                                                                                                                                                                                                       | determination is made there.                                                                                                                                        |
| BEPS-091 | Habitats Regulations Assessment: failure to lawfully screen out likely significant effects The Applicant's Habitats Regulations Assessment screening is not robust and does not provide a lawful basis for concluding that the Scheme would have no likely significant effect on European sites, whether alone or in combination with other plans and projects. The starting point is the Applicant's own mapping....                                                            | The Applicant refers to its response to BEPS-082.                                                                                                                                                                                                                                                                                              | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-092 | Hydrological connectivity is established, but its consequences are not assessed The Applicant's aquatic evidence shows that the Scheme affects a dense and connected water environment, not a single isolated receptor. The aquatic appendix identifies 21 waterbodies within or adjacent to the Order Limits and confirms that the assessment area includes connected reaches of Hemphall Beck, the River Tas system, Pulham Beck / Starston Brook and wider ditch networks.... | The Applicant refers to its response to BEPS-083 and BEPS-087. In addition, hydrological connectivity has been established within ES Volume 3: Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy report [AS- 018]....                                                                                             | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-093 | The aquatic baseline is incomplete and precautionary screening is impossible on the present evidence The Applicant's aquatic appendix is not a full species assessment. It says expressly that it is a 'proportionate, habitat-led appraisal' and not a survey to confirm species presence....                                                                                                                                                                                   | The Applicant refers to its response to BEPS-083 and BEPS-087.                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-094 | More importantly, pre-application, BEPS supplied East Pye The Applicant Solar with evidence from Norfolk Rivers Trust that a BEPS-087. confirmed breeding population of white-clawed crayfish has been identified less than 2KM upstream within the chalk- stream system connected to the River Tas, and surveyed multiple times during the past five years. The custodian of this colony is registering as an interested party and making submissions on this matter....        | refers to its response to                                                                                                                                                                                                                                                                                                                      | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-095 | The Applicant's no-LSE conclusion is undermined by its own evidence The ecology chapter claims negligible and non-significant effects on white-clawed crayfish and other aquatic receptors, largely by relying on low habitat suitability at surveyed crossing points and embedded controls. But that conclusion is not robust for three reasons. First, the surveyed reaches are only a subset of a wider connected catchment and were assessed in dry conditions....           | The Applicant refers to its response to BEPS-083 and BEPS-087.                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-096 | In-combination effects are not ruled out The Shadow HRA recognises that the screening question is whether likely significant effects can be excluded, whether alone or in combination with other plans and projects. Yet the application does not provide a catchment- scale in-combination assessment of multiple crossings, multiple runoff pathways and multiple works affecting the same hydrological systems....                                                            | Crucially, and as set out in Shadow Habitat Regulations Assessment [AS-036] the protected Sites sit at a higher elevation than the Scheme, and/or sit within a different catchment such that impacts associated with hydrology (pollution, sedimentation, run-off) cannot occur, thereby negating the value of a catchment wide assessment.... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-097 | Conclusion The Applicant has not lawfully screened out likely significant effects on European sites. Its own evidence establishes a hydrologically connected landscape, identifies multiple risk pathways for sediment, pollution and altered flows, and acknowledges important limitations in the aquatic baseline, including dry-condition surveys and habitat-led appraisal rather than direct species confirmation....                                                       | The Applicant refers to its response to BEPS-083 and BEPS-087.                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-098 | Habitats Regulations Assessment: failure to assess barbastelle functional habitat and functionally linked land The Applicant has not lawfully screened out likely significant effects arising from the Scheme's impact on functionally linked habitat used by barbastelle bats. The Scheme is not proposed in an ordinary arable landscape of low bat sensitivity....                                                                                                            | The Applicant refers to its response to BEPS-088                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-099 | The Applicant's bat survey evidence confirms that                                                                                                                                                                                                                                                                                                                                                                                                                                | The Applicant agrees with the notable importance of the                                                                                                                                                                                                                                                                                        | Answered                    | Limited - mainly                  | Partly. The Applicant states                                                                                                  | The Applicant gives an issue-specific explanation                                                                                                                                                                     | \$2.3 The Applicant - cross-                                                                                                                                        |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
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|          | barbastelle activity is widespread and significant across the Scheme area. The ES records that barbastelle were the third most abundant bat species and were recorded at every sampled location across the Order Limits, contributing to an overall bat assemblage of national importance....                                                                                                                                                                                                                           | local barbastelle populations and landscaping and scheme design has taken this into consideration, providing increased field boundary margins and a significantly increased hedgerow linear network for connectivity to wider habitats. Further information is found in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] as well as ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]....                                                                                        |                             | restates existing position        | a substantive position, but the underlying evidential or merits dispute is not thereby resolved.                              | or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                   | checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                |
| BEPS-100 | The objection is stronger still because there is evidence of a hibernation resource on the same edge. BEPS' existing objection record states that the former bomb shelters of the WWII Hardwick Airbase bordering Sites 3A and 3B were converted by their owners into bat hibernacula and are now home to a wide range of bat taxa, in addition to the barbastelle colonies roosting in Spring Wood. That means Site 3 appears to sit beside a combined maternity, hibernation and commuting landscape....              | Site 3B has since been removed from the Order Limits leaving just Site 3 (formerly Site 3A). There is a significant stand-off buffer to Spring wood from Solar PV and an increase in field boundary habitat compared to previous agricultural land. Additional retained cereal crops have been included to the north west of Spring Wood to aid Skylark Mitigation....                                                                                                                                     | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-101 | Nor can the Applicant rely on generic habitat buffers and outline mitigation to cure the problem at screening stage. Norfolk Wildlife Trust's consultation response is telling. It says Site 3 surrounds Spring Wood CWS and adjacent deciduous woodland; that the site had previously been recommended for removal from the selection because of likely impacts on the CWS; that even with revised layout there remained concern about works in this area, especially a substation in the field immediately west of... | The substation and battery energy storage site is located adjacent to Site 1B in the south-west corner of the development approximately 7km from Spring Wood. The development of Site 3 includes solar array, retained arable farmland for skylark mitigation and green infrastructure including stand-off buffers from ancient woodland, planted scrub, the creation of species-diverse grassland and hedgerow planting....                                                                               | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | §2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-102 | The cumulative effect of the Applicant's own evidence is therefore clear. Spring Wood is immediately adjacent to Site 3 and supports a known barbastelle maternity colony. The whole Order Limits fall within overlapping barbastelle CSZs. Barbastelle activity is recorded across the entire Scheme and is of national importance. Site 3 itself is identified by the Applicant as adjacent to a known barbastelle roost site and foraging area....                                                                   | The Applicant refers to its response to BEPS-088.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                     |
| BEPS-103 | Chapter 1 – Introduction BEPS objects to Chapter 1 of the Environmental Statement because it is not a neutral introductory chapter. It performs an important framing role for the whole ES, yet it presents contested propositions about consultation adequacy, PEIR sufficiency and the significance of later design changes as though they were established facts....                                                                                                                                                 | The Applicant refers to its response to BEPS-104 to BEPS-109.                                                                                                                                                                                                                                                                                                                                                                                                                                              | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-104 | Chapter 1 states that consultation alongside the EIA process is 'critical to the development of a comprehensive and proportionate ES' and that the PEIR was prepared so consultation bodies could develop an informed view of the likely significant effects of the Scheme. It further presents the consultation process as having successfully engaged the relevant parties and informed the evolution of the project. Those are not merely descriptive statements....                                                 | ES Volume 1, Chapter 1 – Introduction [APP-037] provides a short summary of the consultation process. As stated within Chapter 1, the Consultation Report [APP-024] has been produced which provides a more detailed summary of the non- statutory consultation methodology and extent of engagement and participation over the consultation period. An overview of the issues raised in feedback submitted during consultation, as well as the Applicant's response to this feedback is also detailed.... | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | §2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-105 | A particularly serious defect is Chapter 1's treatment of the targeted consultation. The chapter states that the later changes were 'localised' and 'minor in their nature' and that they did not give rise to any materially new or different likely significant environmental effects compared to those reported in the PEIR. That is a highly consequential procedural and environmental conclusion. Yet Chapter 1 provides no substantive analysis to justify it. It is simply asserted....                         | ES Volume 1, Chapter 1 – Introduction [APP-037] provides a short summary of the targeted consultation process. As stated within Chapter 1, the Consultation Report has been produced which provides a more detailed summary of the targeted consultation process....                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | §2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-106 | Chapter 1 also fails to provide a fair opening account of the principal cross-cutting constraints and controversies affecting the Scheme. It describes the Scheme, the Order Limits and the 60-year operational life, but it does not candidly identify at the outset the central disputes that bear on the planning balance and on the reliability of the ES: the contested need case, the dispersed and fragmented nature of the project, the cumulative burden with other schemes, and the repeated criticisms of... | ES Volume 1, Chapter 1 – Introduction [APP-037] is not intended to describe objections to the Scheme. The Consultation Report [APP-024] and its Appendices [APP-025 to APP- 034] provide a detailed account of how consultation feedback, including prescribed consultees and public comments, has been considered and, where appropriate, how they have influenced the evolution of the Scheme....                                                                                                        | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | §2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-107 | The chapter is further weakened by its presentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The Applicant considers that the requirements of                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Answered                    | Limited - mainly                  | Partly. The Applicant states                                                                                                  | The Applicant gives an issue-specific explanation                                                                                                                                                                     | Relevant thematic section in                                                                                                                                  |

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                    | Audit classification | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                 |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | of compliance by cross-reference. Table 1.3 maps Schedule 4 requirements to other parts of the ES, but a table of references is not the same as substantive compliance....                                                                                                                                                                                                                                                                                                                        | Schedule 4 of the EIA Regulations have been addressed within the ES. Table 1.3 signposts to the relevant documents where each of the requirements are met. PP-036 to APP-195] and ntl surveys have been n by competent experts with ble experience assessing emes. Details of tions, experience and nal institute membership are within ES Volume 3, 2 - Statement of [APP-112]. |                      | restates existing position                          | a substantive position, but the underlying evidential or merits dispute is not thereby resolved.                              | or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                                    | EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                      |
| <b>BEPS-108</b> | For those reasons, BEPS submits that Chapter 1 should be given limited weight. The Examining Authority should not accept at face value the chapter's characterisation of consultation adequacy, PEIR sufficiency or the non- materiality of the targeted consultation changes. Those matters should instead be tested carefully against the underlying evidence across the application documents, statutory consultee responses and Interested Party representations....                          | The Applicant does not consider that ES Volume 1, Chapter 1 – Introduction [APP-037] impairs the transparency, fairness, or reliability of the ES.                                                                                                                                                                                                                               | Answered             | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| <b>BEPS-109</b> | Relief sought The Examining Authority is requested to treat Chapter 1 with caution, to give it reduced weight where it advances conclusions on consultation adequacy and environmental immateriality, and to require the Applicant to justify those assertions by reference to the underlying evidence rather than introductory narrative....                                                                                                                                                     | The Applicant does not consider that ES Volume 1, Chapter 1 – Introduction [APP-037] should be given reduced weight.                                                                                                                                                                                                                                                             | Answered             | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| <b>BEPS-110</b> | Chapter 2 – EIA Methodology, Embedded Controls, Deferral and Cross-Cutting Adequacy Introduction This representation objects to the adequacy of the Environmental Statement's methodology and to the extent to which the applicant seeks to rely on outline control documents, generic matrices, post-consent management plans and broad design flexibility in place of a sufficiently fixed, transparent and evidence-led assessment. Chapter 2 matters are not procedural in a narrow sense.... | The Applicant considers the EIA Methodology set out within ES Volume 1, Chapter 2 – EIA Methodology [APP-038] to be adequate, providing a reliable basis for decision-making. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP- 205]....                                                                              | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

**Table A3: BEPS entries BEPS-111 to BEPS-165**

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                                            |
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| BEPS-111 | The objection is therefore cross-cutting. It applies not only The Appli to Chapter 2 in isolation, but to the way Chapter 2, BEPS-110. APP/7.18, APP/7.1, APP/7.2 and the policy appendix together structure the entire ES....                                                                                                                                                                                                                                                                                         | cant refers to its response to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-112 | Chapter 2 is excessively generic and does not provide a sufficiently scheme-specific methodology The primary defect is that the methodology chapter appears to do too little of the work that a methodology chapter should do....                                                                                                                                                                                                                                                                                      | 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....                                                                                      | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-113 | The applicant's own legislation and policy appendix demonstrates the breadth and specificity of the standards said to apply across chapters. It identifies detailed national policy requirements on climate resilience, greenhouse gas assessment, landscape and visual assessment, biodiversity, water quality and resources, heritage significance and setting, soils, contamination and waste....                                                                                                                   | In accordance with established EIA practice, ES Volume 1, Chapter 2 – EIA Methodology [APP-038] provides the overarching methodology for the ES, and the topic chapters provide the technical assessment methodology which considers topic-specific guidance and standards. Paragraph 2.3.2 of Chapter 2 outlines the relevant guidance that the ES has been prepared in accordance with....                                                                                                                                         | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-114 | Excessive reliance on outline control documents and post- consent approvals A central objection is that the applicant relies on outline management plans and future approvals to fill gaps that should already have been resolved at application stage. APP/7.1 is explicitly an outline Construction Environmental Management Plan and states that the detailed CEMP will only be produced after consent and before construction....                                                                                  | Management and mitigation measures are secured through the various outline management plans [APP-196 to APP- 205]. Detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]....                     | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-115 | Rochdale-envelope flexibility has not been adequately constrained APP/7.18 is one of the most important documents in the application because it sets the design principles, parameters and commitments against which the ES is supposedly assessed....                                                                                                                                                                                                                                                                 | 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....                                                                                                                                                                                                             | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-116 | Construction effects remain materially unresolved APP/7.1 reveals that key construction assumptions remain unsettled. The document provides only an outline framework. It anticipates construction from 2028 for about 24 months with energisation in 2031, but much of the actual construction methodology remains to be finalised later. This includes not only general working methods, but matters central to impact assessment. Most notably, cable route construction methodology remains materially unfixed.... | As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Scheme and are secured in the Outline CEMP [APP-196]. The outline management plans establish a framework for the details to be secured through the DCO Requirements....                                                                                                                                                                                                                                                 | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-117 | Operational effects are understated and too much is deferred over a 60-year scheme life APP/7.2 demonstrates that the operational case is not one of low-intensity maintenance alone. It assumes operation from 2031 for up to 60 years, with decommissioning in 2091. It also assumes all solar panels will be replaced once after 40 years taking up to 24 months, that the BESS may be replaced up to five times, and that transformers may be replaced once after 30 years....                                     | ES Volume 1, Chapter 4 – The Scheme [APP-040] Section 4.5 provides details on the operation and maintenance phase of the Scheme, including the two scenarios which have been considered within the ES: general operational maintenance activities and the programme of replacement activities. ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] assesses the water demand for the Operation and Maintenance Phase. A potable and non-potable water supply demand balance can be reached with embedded mitigation.... | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-118 | Spatial baseline and receptor sensitivity are understated APP/2.9 and APP/2.10 are particularly important because they show that the Order Limits sit within a wider ecological network, not in isolated low-value fields. APP/2.9 maps County Wildlife Sites, Roadside Nature Reserves and numerous Priority Habitat Inventory features around the Order Limits, including broadleaved woodland, grazing marsh, lowland meadow, fen, ponds, reedbeds and orchard-related habitat....                                  | The Applicant agrees that the Non- Statutory Sites or Features of Nature Conservation Plan [APP-013] and Statutory Sites or Features of Nature Conservation Plan [APP-014] are important and show the relationship of the Scheme to sites or features of nature conservation. A description of the Order Limits is provided within ES Volume 1, Chapter 3 – The Order Limits [APP-039], including a description of the nearest designated sites....                                                                                  | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-119 | Generic significance matrices and professional                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The ES [APP-036 to APP-195] and environmental and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Answered                    | Some - fuller                                       | Partly. The Applicant states                                                                                                  | The Applicant gives an issue-specific explanation                                                                                                                                                                                      | \$2.6 EIA Methodology and                                                                                                                                                                        |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                 |
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|          | judgment are not sufficiently transparent A recurring methodological concern is the extent to which broad significance matrices and generalised professional judgment appear to be doing the real work of significance evaluation....                                                                                                                                                                                                                                                                                     | ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]. ES Volume 1, Chapter 2 – EIA Methodology [APP-038] provides an overview of the EIA process and general methodology, including an explanation of the effect significance criteria....                                    |                             | explanation or data                                 | a substantive position, but the underlying evidential or merits dispute is not thereby resolved.                              | or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                                    | Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                           |
| BEPS-120 | Cumulative and interrelationship methodology is not robust enough This scheme is exceptionally dependent on cumulative and interrelationship assessment. That is because its effects are not generated by one concentrated site, but by dispersed field parcels, cable corridors, substations, BESS, overhead line works, access changes and long-term operational replacement. Methodology must therefore grapple with cumulative burden both within the scheme and with other schemes....                               | The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation....                                                                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-121 | Water environment methodology is particularly vulnerable The water environment is one of the clearest examples of why Chapter 2 methodology matters. The policy appendix shows that the applicant accepts the relevance of flood risk, WFD, sustainable drainage, water quality, water stress, Anglian Water planning documents, CAMS, rainwater harvesting guidance and Norfolk LLFA drainage guidance....                                                                                                               | The Scheme has Work Nos. and does not have a detailed design at this stage for the BESS and Substation areas. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within the Outline CEMP [APP-196]....                                                                                                                                                                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-122 | Landscape, heritage and visual mitigation rely excessively on future planting performance APP/7.2 makes plain that much of the operational landscape and heritage case depends on planting, woodland belts, hedgerow reinforcement, 3m managed hedgerow height and long-term vegetation establishment and maintenance. This is not just a landscape issue. It is part of the methodology by which the applicant seeks to reduce visual, heritage, glint and glare and amenity effects over time....                       | The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Section 4.3 of the Outline LEMP [APP-199] outlines the monitoring approach used to assess progress towards the commitments defined within the Outline LEMP.... | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-123 | Ecology and biodiversity controls remain dependent on future action rather than present certainty The policy appendix shows that the ecology chapter is anchored to the mitigation hierarchy, protection of irreplaceable habitats, coherent ecological networks and a wide range of CIEEM, Natural England and other guidance. APP/2.9 and APP/2.10 show the ecological sensitivity and connectivity of the receiving environment....                                                                                    | The Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] are designed with the objective of securing the relevant ecological mitigation measures. It also sets out monitoring and reporting arrangements to ensure mitigation measures remain effective....                                                                                                             | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-124 | Policy appendix APP/6.3.2.3 exposes the gap between listed standards and demonstrated compliance APP/6.3.2.3 is a valuable cross-cutting document because it lists, chapter by chapter, the legislation, planning policy and guidance the applicant says applies. But it also exposes the gap between naming standards and meeting The Applicant them....                                                                                                                                                                 | The Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. It considers that the scheme is in accordance with national policy, national planning policy, and development plan considered as a whole. Volume 1, Chapter 6 - Climate APP-042] the Applicant - life GHG assessment which stated GHG emissions within the Scheme across its lifespan (i.e....                                                   | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-125 | Overall conclusion on Chapter 2 and cross-cutting methodology Taken together, Chapter 2, APP/7.18, APP/7.1, APP/7.2, The ES has APP/2.9, APP/2.10 and APP/6.3.2.3 do not give and evaluate confidence that the likely significant effects of the effects of development have been identified, assessed and environment controlled with the degree of certainty required for a lawful to mitigate and reliable examination-stage ES. negative effect ensure decision make an inf The recurring problems are consistent.... | The Applicant refers to its response to BEPS-110 to BEPS-124, been prepared to identify the likely significant the Scheme on the and to identify measures or manage any significant facts. In turn this will help to ensure makers are able to informed judgement on the impacts of the Scheme. been prepared in with relevant guidance as paragraph 2.3.2 of ES chapter 2 – EIA [APP-038].                                                                                                                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-126 | Cumulative Assessment A comprehensive Combination The cumulative assessment is not presented in a way that allows consultees or the Examining Authority to understand been undertaken Planning the real spatial scale of cumulative burden. Figure 2.1, detailed labelled 'Cumulative Developments', does not show the 2 EIA Measure actual order limits, footprints, cable corridors, substations, types of pylon works, land-take or physical spread of surrounding assessed schemes....                                | Comprehensive Cumulative and In combination Effects Assessment has been undertaken in accordance with Inspectorate guidance as within ES Volume 1, Chapter methodology [APP-038]. Two cumulative effects have been within the ES: combination effects – the inter-relationship between individual development effects on one particular receptor; and vice effects – multiple existing proposed developments giving additive effects which together have an increased effect on the same receptors....     | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.   |
| BEPS-127 | Remedies sought For those reasons, the Examining                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The Applicant refers to its response to BEPS-110,                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-          | No material new                                     | No. The response mainly                                                                                                       | The response identifies an existing chapter,                                                                                                                                                                                           | \$2.3 The Applicant - cross-                                                                                                                                          |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                 |
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|          | Authority and Secretary of State are respectfully requested to give this objection substantial weight and to require the applicant to remedy these deficiencies before any conclusion is reached that the environmental information is adequate....                                                                                                                                                                                                                                                                     | BEPS-112, BEPS-113, BEPS-119, BEPS-120, and BEPS-125.                                                                                                                                                                                                                                                                                                                                                                                                                                               | reference                   | information                       | sends the reader back to material whose adequacy BEPS challenged.                                                             | appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                                                  | checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                        |
| BEPS-128 | second, a clear schedule identifying every material matter currently deferred to future plans, with justification for why that deferral is lawful and why the issue could not and should not have been resolved at application stage;                                                                                                                                                                                                                                                                                   | The Applicant refers to its response to BEPS-114, BEPS-115, and BEPS-116.                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-129 | third, fixed and examination-stage details, or at minimum materially tighter controls, for cable crossing methods, drainage design principles, pollution safeguards, lighting controls, operational replacement assumptions and other matters currently left to future detailed CEMP/OEMP processes;                                                                                                                                                                                                                    | The Applicant refers to its response to BEPS-114, BEPS-115, BEPS-116, BEPS-117, BEPS-122, and BEPS-123.                                                                                                                                                                                                                                                                                                                                                                                             | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-130 | fourth, a revised explanation of how APP/7.18 parameters have been translated into a consistent worst-case assessment across all topics;                                                                                                                                                                                                                                                                                                                                                                                | The Applicant refers to its response to BEPS-115.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-131 | fifth, a fuller cross-cutting assessment of the operational replacement programme and its construction-like effects over the 60-year life of the scheme;                                                                                                                                                                                                                                                                                                                                                                | The Applicant refers to its response to BEPS-117.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.6 EIA Methodology and Commitments Register - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-132 | sixth, a more robust treatment of the connected ecological and hydrological baseline using APP/2.9 and APP/2.10 as spatial benchmarks; and seventh, topic-by-topic confirmation of how the applicant has substantively complied with the policy and guidance standards listed in APP/6.3.2.3, rather than merely citing them....                                                                                                                                                                                        | The Applicant refers to its response to BEPS-118 and BEPS-124                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| BEPS-133 | Introduction Chapter 3 is presented as the chapter that describes "the area within which the Scheme would be situated and the surrounding area." It should therefore provide the Environmental Statement's framing description of the land, receptors, constraints and surrounding context against which all later topic chapters are read. It does not do so adequately....                                                                                                                                            | ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear and accurate description of the Order Limits, including site naming, site locations and areas, and key environmental and planning constraints within and surrounding the Order Limits. The Order Limits are also shown visually on ES Volume 2 Figure 1.1 - Location Plan [APP- 057]....                                                                                                                                       | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-134 | The Chapter misdescribes the Scheme as a set of land parcels rather than a dispersed industrial intervention The first defect is one of characterisation. Chapter 3 defines the Order Limits as the maximum extent of land anticipated to be acquired and/or used for construction, operation, maintenance and decommissioning, and then lists the scheme components: ten sites, sub-sites, a BESS site, multiple substations, a National Grid substation, a cable route corridor, overhead line works and highway w... | ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear and accurate description of the Order Limits, which are defined as the maximum extent of land anticipated to be required for the construction, operation and maintenance, and decommissioning phases of the Scheme. Chapter 3 is not intended to provide an assessment of the impacts of the Scheme.                                                                                                                           | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-135 | Chapter 3 fails to provide an integrated description of the receiving environment Paragraph 3.4.1 is particularly revealing. It states that key environmental and planning constraints are shown on another figure, and that further detail regarding baseline conditions is provided in Chapters 6 to 20. That is not an adequate substitute for a proper Chapter 3 description. A chapter called "The Order Limits" should not merely point the reader elsewhere for the substance of the receiving environment....   | The Applicant refers to its response to BEPS-133.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-136 | The landscape description is reductive and strips out the qualities that make this place sensitive The landscape section says there are no statutory landscape designations covering the sites or within 5 km, that the Broads National Park lies 3.9 km from Sub-Site 10A, that the topography is predominantly flat, and that the sites are bordered by trees and hedgerows. Those statements are not false, but they are incomplete to the point of distortion....                                                   | As signposted within Chapter 3, A description of the landscape and visual baseline is provided within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] provides further detail on the baseline landscape receptors. Landscape receptors comprise landscape designations, landscape character and key characteristics, landscape features, and specific aesthetic or perceptual aspects of the landscape, within the Study Area.... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                                     |
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| BEPS-137 | The chapter underplays the extent to which the Order Limits lie within a settled and inhabited countryside. Although Chapter 3 includes Table 3.1 of nearby residential features, the overall presentation still minimises the fact that the Scheme is interwoven with existing settlements and isolated dwellings. The chapter records, for example, residential areas and dwellings close to multiple sites, including properties within 75 metres of Sub-Site 1A and 120 metres of Sub-Site 1B....          | ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of nearby residential features within Table 3.1, with details provided for each Site and CRC. Baseline conditions and sensitive receptors relevant to each technical assessment are detailed within the ES topic chapters [APP-036 to APP-195].                                                                                                                                                                                 | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-138 | The chapter fails to present heritage sensitivity as a defining characteristic of the Order Limits. Chapter 3 includes a table of listed buildings, but again the treatment is atomised and selective rather than thematic. The broader East Pye material already shows why that is problematic. The scoping approach itself adopted a narrow method for some areas, reporting Grade II listed buildings only up to 100 metres because of their prevalence, with other assets deferred to later assessment.... | Table 3.2 of ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of listed buildings within 1km of the Site, with details provided for each Site and CRC. Chapter 3 also details sites designated for their cultural heritage value within the local area. As signposted within Chapter 3, a full description of the cultural heritage baseline is provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]....                                                        | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                           |
| BEPS-139 | Hydrology and water sensitivity are not properly described at Order Limits level. Water is central to East Pye, but Chapter 3 does not describe the Order Limits in a way that properly foregrounds hydrological sensitivity. The chapter refers only at a high level to existing conditions and leaves detail to later chapters. That is inadequate in this case....                                                                                                                                          | ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of the baseline, including relevant Flood Zones, surface water flooding risk, principal watercourses, and ordinary watercourses. Table 3.3 also summarises the ground conditions for each site, including Aquifer classifications. As signposted within Chapter 3, a full description of the water environment baseline is provided within ES Volume 1, Chapter 9 – Water Environment [APP-045]....                             | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                           |
| BEPS-140 | Utilities and buried infrastructure constraints are under-described or absent. Chapter 3 should also have described the Order Limits as land already containing and interacting with nationally significant and local utility infrastructure. That matters because utility interfaces are not merely engineering details; they define what land can safely and lawfully be used and how....                                                                                                                    | It is acknowledged that ES Volume 1, Chapter 3 - The Order Limits [APP-038] does not include a description of utilities or buried infrastructure constraints, however this information is presented elsewhere within the ES. Section 18.3 of ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] presents an assessment of the likely effects on telecommunications, utilities, and television receptors....                                                                                         | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-141 | The chapter normalises flexibility rather than explaining its environmental consequences. The width of the cable route corridor and the range of works within it are especially important. Chapter 3 says the corridor can widen up to 405 metres to allow flexibility for detailed design and temporary construction compounds, and that working widths will vary for crossings of watercourses, roads and utilities....                                                                                      | ES Volume 1, Chapter 3 - The Order Limits [APP-038] is not intended to provide an assessment of the impacts of the Scheme. ES Volume 1, Chapter 4 – The Scheme [APP-040] includes a description of the Cable Route Corridor. Chapter 4 clarifies that the exact location of the Grid Connection Cables within the Cable Route Corridor will be determined at the detailed design stage. The voltage of the cables and the number of circuits will affect the width and number of the cable trenches required.... | Deflected / cross-reference | Limited clarification                       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-142 | The chapter does not properly reflect the concerns raised at scoping stage about the need for fuller description. The Planning Inspectorate's Scoping Opinion required fuller clarity in the ES on matters such as access points, underground cables, HDD parameters, construction compounds, operation, decommissioning and restoration....                                                                                                                                                                   | ES Volume 1, Chapter 3 - The Order Limits [APP-039] is not intended to provide a description of the Scheme, or an assessment of the impacts of the Scheme. A description of the Scheme is provided in ES Volume 1, Chapter 4 - The Scheme [APP-040]. The likely significant effects of the Scheme are assessed within each topic chapter [APP-042-APP-054].                                                                                                                                                      | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                        |
| BEPS-143 | Why this matters to the ES as a whole. This is not a merely stylistic complaint. Chapter 3 is the gateway through which the whole ES is read. If that chapter presents the Order Limits as a collection of land parcels with some nearby receptors, rather than as a dispersed industrial scheme imposed across a settled, heritage-rich, ecologically and hydrologically sensitive, infrastructure-constrained rural landscape, then every later chapter is read against a diminished baseline....            | For the reasons set out within responses to BEPS-133 to BEPS-142, the Applicant does not consider that ES Volume 1, Chapter 3 - The Order Limits [APP-039] understates the sensitivity of the receiving environment or weakens the reliability of the ES baseline as a whole.                                                                                                                                                                                                                                    | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                             |
| BEPS-144 | Remedies sought. The Applicant should be required to produce a revised Chapter 3, or equivalent supplementary environmental information, that properly describes the Order Limits as an interconnected environmental setting rather than a parcel schedule....                                                                                                                                                                                                                                                 | The Applicant does not intend to update ES Volume 1, Chapter 3 - The Order Limits [APP-039] in this regard. The Applicant refers to its response to BEPS-133 to BEPS-142.                                                                                                                                                                                                                                                                                                                                        | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                |
| BEPS-145 | Chapter 4 – The Scheme Introduction. BEPS objects to the proposed development on the basis that the scheme description, associated plans and supporting illustrative material do not provide a sufficiently clear, fixed and intelligible account of what is actually proposed....                                                                                                                                                                                                                             | The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. The Applicant refers to its response to BEPS-146 to BEPS-158.                                                                                                                                                                                                                                                                                                                | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                                            |
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|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        | there.                                                                                                                                                                                           |
| BEPS-146 | Chapter 4 does not provide a sufficiently fixed and intelligible project description Chapter 4 describes a solar generating station of over 100 MW with associated development including a BESS, up to three 132 kV project substations, up to three 400 kV project substations, grid connection infrastructure and a new National Grid substation....                                                                                                                                                                 | 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. It is seeking flexibility in order to allow for advancement to early production. For the tracker and fixed panels at this stage, with the being confirmed at the final stage....                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-147 | Inadequate definition of principal infrastructure, especially BESS, substations and grid connection works The Scheme includes the elements most likely to generate major concerns as to visual intrusion, industrialisation of the countryside, safety risk, operational impacts and land-take: the BESS, multiple 132 kV and 400 kV substations, grid connection infrastructure and the National Grid substation. These are not secondary details. They are core parts of the development....                         | ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of the Scheme components, including the BESS, Project Substations, Grid Connection Infrastructure, and the National Grid Substation. The EIA has been undertaken in accordance with the Rochdale Envelope approach. All technical chapters determine and assess the maximum parameters where flexibility needs to be retained as under the Rochdale Envelope Approach....                                                                                  | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-148 | The industrial character and physical scale of the Scheme Appendix 4.1 is particularly significant because it translates abstract descriptions into dimensions and engineering forms....                                                                                                                                                                                                                                                                                                                               | ES Volume 3, Appendix 4.1 Illustrative Technical Information [APP-117] is provided to aid the readers understanding of the Scheme. Chapter 4 also includes a series of images showing typical Scheme components. However, this illustrative information does not form the basis of assessments within the ES. The ES is based on a set of maximum parameters (as described in ES Volume 1, Chapter 4 – The Scheme [APP-040]) in line with the Rochdale Envelope approach, to assess a likely reasonable worst-case scenario.... | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-149 | Construction phase impacts are wider, more fragmented and more intrusive than the chapter text suggests Figure 4.3. 'Key Construction Phase Features' maps not only the Order Limits and cable route corridor, but also avoidance areas, highway works, temporary construction compounds, crossings, highway accesses and highway/crossing points across the whole Scheme. The figure shows that the construction phase is not a contained on-site activity....                                                        | Section 4.4 of ES Volume 1, Chapter 4 – The Scheme [APP-040] describes the Construction Phase, including details relating to programme, construction activities, construction compounds, construction traffic, and access to the Order Limits. Mitigation measures and management of traffic and access are set out in the Outline CTMP [APP-201] and Outline OTMP [APP-202] and the management of PRoW is described in Outline PRoWPPMP [APP-203] to minimise impacts as far as practicable.                                   | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-150 | 'Highway improvement areas' and construction access Highway Works interventions remain inadequately explained movement of Figure 4.3 repeatedly labels 'Highway Improvement Areas,' along narrow road network particularly around the western and central parts of the Scheme....                                                                                                                                                                                                                                      | It will support the safe construction vehicles sections of the local road and reduce potential to the public highway. The works will contain localised works to deteriorated road temporary highway and traffic way Works that have been identified where the error or oversail are in the Outline CTMP [APP-040] with the likely and suitable works to the Scheme....                                                                                                                                                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-151 | Outdated and inconsistent mapping undermines the Applicant confidence in the scheme description are figures Figure 4.2, the indicative temporary construction compound not show the such as ES V locations plan, appears to use an outdated base map that Indicative T does not include the Long Stratton Bypass. The Works Compound Location Plan also uses an outdated map. By contrast, Figure 4.3 uses a more contemporary mapping base for the The Applicant construction-phase features....                      | It acknowledges that there with base mapping that do Long Stratton Bypass, Volume 2, Figure 4.2 temporary Construction ations [APP-060]. It has considered the Long as part of the assessments presented in the ES [APP-036 to APP-195], as appropriate. The OS basemaps presented on the plans and figures do not affect the assessments provided as part of the DCO Application....                                                                                                                                           | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-152 | The Works Plan uses an outdated base map and is too dependent on coded work numbers and layered interpretation The Works Plan still relies on a pre-bypass base map. It is a large layered document comprising an index plan and 19 sheets at 1:2,500 scale. It explains that users should open the PDF in Adobe Acrobat and toggle individual work layers on and off to see the extent of specific works as described in Schedule 1 of the Draft DCO. Only a paid subscription to Adobe allows that functionality.... | The Applicant refers to its response to BEPS-151 regarding the OS basemaps. The Applicant's position is that the Works Plans provide the necessary detail to understand the spatial layout of the Works required for the Scheme. The function of toggling the layers can be a useful tool to see individual Works, but is not a requirement to understand the layout of all the Works....                                                                                                                                       | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-153 | Figure 5.1 confirms the exceptional density of constraints Figure 5.1, 'Environmental Constraints and Key Features' confirms the density of environmental and heritage receptors surrounding the Scheme....                                                                                                                                                                                                                                                                                                            | ES Volume 2, Figure 5.1 Environmental Constraints and Key Features [APP-062] has been produced to support ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], and as such shows the environmental constraints within a 20km radius of the Norwich Main Substation. ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of the Order Limits....                                                                                                                        | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                                            |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-154 | The Scheme sits in an exceptionally constrained receiving environment Even in its compressed form, Figure 5.1 is enough to show that the Order Limits are embedded in a landscape containing a very large number of designated and sensitive receptors. The site is not a blank or environmentally spare location. It is a receptor-dense landscape of heritage assets, ecological designations, flood-sensitive land and varied topography....                                                                         | The Applicant refers to its response to BEPS-146 regarding design flexibility and the Rochdale Envelope approach.                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-155 | Construction compounds and temporary works are industrial in scale Appendix 4.1's construction compound drawings show indicative compounds of 100 x 100 m and 130 x 130 m containing office and welfare units, storage containers, laydown areas, parking, turning areas, reception areas, wheel washers and vehicle swept paths. This confirms that construction compounds are not minor ancillary features. They are substantial industrial spaces....                                                                | ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of the temporary construction compounds, with the locations shown in ES Volume 2, Figure 4.2 - Indicative Temporary Construction Compound Locations [APP-060]. The Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters for the temporary construction compounds. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters....                                                 | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-156 | Access tracks and ground treatment confirm engineering and compaction impacts on agricultural land The illustrative internal access track detail shows a 3.5-5.0 m wide track made up of permeable aggregate, a minimum 30 cm aggregate sub-base, geotextile and compacted soil. This is a material point for soils and agricultural land. The use of the term 'compacted soil' and the need for a substantial engineered track section demonstrate that internal infrastructure is not agriculturally neutral....      | The potential effects of access tracks have been considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. This concludes that these areas are capable of full restoration without adverse effects or loss of land of BMV quality.                                                                                                                                                                                                                                                                                     | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-157 | Security and ancillary infrastructure are not minor or visually negligible The illustrative drawings also show deer fencing panels of 2.5 m height, substation palisade fencing at 3.0 m, CCTV poles of 4.0 m height, and other security-related infrastructure. Such features are not trivial. In a rural landscape of historic villages, scattered farmsteads and open views, they contribute to the industrialisation of the countryside and affect both landscape character and the setting of heritage assets....  | ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of fencing and security, with illustrative images provided to aid reader understanding. The Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters for fencing, lighting, and security. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters, including for fencing, lighting, and security....                                                                              | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-158 | Chapter 4 still pushes too much essential understanding into other documents Chapter 4 tells the reader that it should be read alongside other figures, DCO plans and related material. Cross-reference is acceptable up to a point, but here it becomes part of the problem. To understand the Scheme, the reader must move between Chapter 4, figure plans, the works plan, the layered works PDF, the Draft DCO Schedule 1, parameter and Appendix 4.1. detail of the That fragmentation weakens intelligibility.... | The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. Chapter 4 provides information on: the Scheme description; a description of the Work Numbers; the Rochdale Envelope approach and the Scheme ers assessed within the ES; on the role and function of each Scheme components, supported and drawings; Scheme-wide components such as fencing construction programme; on of construction activities h Scheme component; ction staff, construction hours... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-159 | Overall conclusion on Chapter 4 and associated plans Taken together, Chapter 4, Figures 4.2 and 4.3, the Works Plan, Figure 5.1 and Appendix 4.1 do not amount to a sufficiently fixed, coherent and intelligible statement of the Scheme....                                                                                                                                                                                                                                                                           | The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. The Applicant refers to its response to BEPS-146 to BEPS-158.                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.5 Scheme Description, Draft DCO and Principles/Parameters/Commitments - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-160 | Remedies sought For those reasons, BEPS requests that the Examining Authority and Secretary of State require the applicant to provide a substantially clearer and more tightly bounded scheme description, including: a revised and up-to-date mapping suite using a consistent contemporary baseline; plain-English explanations of all coded work areas and highway intervention points; definitive rather than merely illustrative technical information for the principal infrastructure and ancillary works mos... | The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. The Applicant refers to its response to BEPS-146 to BEPS-158.                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                       |
| BEPS-161 | Chapter 5: Reasonable Alternatives and Design Evolution The Applica BEPS objects to the application on the basis that Chapter 5 assessment complies wi and the supporting Site Selection Assessment do not Infrastruct provide a lawful, robust or transparent assessment of Impact Asse reasonable alternatives....                                                                                                                                                                                                    | nt considers that the of alternatives undertaken th the requirements of the ure Planning (Environmental ssment) Regulations 2017, t National Policy and the Planning e's EIA Scoping Opinion. The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which confirms that from a policy perspective there is no general requirement to consider alternatives or to                                                                                                                                                                    | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                       | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                         |
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|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | establish whether a development represents the best option....                                                                                                                                                                                                                                                                                                                                                      |                             |                                   |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                                               |
| <b>BEPS-162</b> | A central flaw in the applicant's alternatives case is that it was originally built around a point of connection at Norwich Main Substation, but that premise failed. The Site Selection Assessment confirms that the applicant initially considered Norwich Main and identified an initial 20km search radius from that substation as a commercially viable cable distance, but that NGET later advised there was neither sufficient capacity at Norwich Main nor any opportunity to discount expand it to accommod... | The Applicant has set out in ES Volume 1, Chapter 5 Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] that once Norwich Main Substation was ed the Applicant continued to available connection points T in Norfolk....                                                                                                                                             | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| <b>BEPS-163</b> | The alternatives exercise was driven by land assembly and willing landowners, not environmental comparison The Site Selection Assessment repeatedly shows that land availability and willing landowners drove the outcome....                                                                                                                                                                                                                                                                                           | As detailed in the Site Selection Assessment [APP-215] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], the Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors and the project objectives....                                                                                         | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | §2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-164</b> | Horlock/Holford The applicant's reliance on the Horlock and Holford framework strengthens the objection particularly in relation to siting the National Grid substation. Those principles require substations to be sited and designed so that landform, vegetation and layout reduce visual and wider environmental effects to a reasonably practicable minimum....                                                                                                                                                    | The Applicant considers that the site selection process for the National Grid Substation has been undertaken in accordance with the Horlock Rules, in a manner consistent with the requirements of NPS EN-5 and paragraph 2.11.2 of NPS EN-5 which provides that the Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules.... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| <b>BEPS-165</b> | No evidence that a project of this type or scale is required in South Norfolk or T7 East Anglia The applicant presents need only at an abstract national level. It does not produce evidence that a transmission- connected project of this type or scale is required in South Norfolk at all, or in East Anglia T7 specifically, to meet regional clean-power needs....                                                                                                                                                | The Applicant refers to its response to rows BEPS-002, BEPS-005 and BEPS-010 above. Further, Section 6.3 of the Statement of Need [APP-206] explains that smaller schemes can make a valuable contribution to meeting demand. Paragraph 3.3.12 of NPS EN-1 demonstrates the government's view that smaller schemes are needed alongside, but not instead of, large- scale ground mounted solar schemes....          | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |

**Table A4: BEPS entries BEPS-166 to BEPS-220**

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                          |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-166 | Unlawful or irrational exclusion of 'no development' and reduced-scale alternatives The applicant's rejection of a 'no development' scenario and reduced-scale alternatives is unsound. In this case, those are plainly material alternatives because the need for this specific project in this specific location is disputed and unsupported by any clear T7-specific justification....                                                                                         | In relation to the 'no development' scenario, the Applicant draws attention to paragraph 5.3.2 of ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], which confirms that a 'no development' scenario as an alternative to the Scheme has not been considered further in line with paragraph 4.3.23 of NPS EN-1....                                                                                                                                         | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-167 | The Great Moulton substation was chosen to serve pre- assembled sites, not shown to be the least harmful strategic solution The Site Selection Assessment shows that the Great Moulton strategy was selected because it was close to the 400kV line, accessible from A and B roads, and importantly, in proximity to the solar sites already identified by the applicant....                                                                                                      | The Site Selection Assessment [APP-215] sets out the considerations for the proposed siting of a new National Grid Substation. Following the confirmation that the Norwich Main Substation was not a viable Point of Connection, the Applicant focused on identifying a site along the Bramford to Norwich 400kV line between Diss and Norwich that was appropriate and available for a new National Grid Substation.                                                                    | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-168 | Failure to justify the concentration of major transmission infrastructure at Great Moulton The applicant does not address a central alternatives question raised by the design it now proposes: whether it is necessary or reasonable to concentrate multiple major electrical infrastructure elements in the same locality, including a wholly new National Grid substation, the BESS, major project substations, associated cable corridors and other grid connection works.... | The Design Approach Document [APP-212] and paragraph 5.7.38 of ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] confirm that a general location of the BESS Site and co-location of the 400kV Project Substation was identified in order to be in close proximity to the Point of Connection....                                                                                                                                                          | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-169 | Failure to assess the foreseeable Great Moulton grid-hub scenario The applicant presents the Great Moulton National Grid substation as if it were infrastructure required for East Pye alone. The available evidence suggests a broader foreseeable scenario that has not been disclosed or assessed....                                                                                                                                                                          | The Applicant confirms that the new National Grid Substation forming part of the Scheme has been designed and sized to serve the Scheme, in accordance with the Grid Connection Agreement between the Applicant and the National Energy System Operator, as set out in the Grid Connection Statement [APP-207]....                                                                                                                                                                       | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-170 | Battery oversupply and the weakness of any speculative BESS-led justification This point is sharpened by NESO's current evidence on batteries. NESO's December 2025 reform update said projects not required by 2030 or 2035 would receive Gate 1 rather than Gate 2 and would only be considered for future progression if later criteria were met....                                                                                                                           | The Applicant refers to its response to BEPS-002, BEPS-005 and BEPS-175.                                                                                                                                                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-171 | Failure properly to avoid Best and Most Versatile agricultural land The applicant's agricultural land methodology is also internally inconsistent and weak. At Stage 2 the applicant says it excluded all ALC Grades 1, 2 and 3 from the search area....                                                                                                                                                                                                                          | The Stage 2 exclusion of ALC Grades 1, 2 and 3 was undertaken using Natural England's 1970s Provisional ALC mapping, which does not differentiate between Grades 3a and 3b. As the Order Limits and wider search area are predominantly shown as undifferentiated Grade 3 on that mapping, the initial application of the exclusion criterion did not identify sufficient available land to accommodate a scheme of the required scale....                                               | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-172 | Brownfield, rooftop and alternative-location analysis is The Site Se superficial [APP-215] a The applicant dismisses brownfield and rooftop alternatives 5 – Reasona Design Evol largely because no individual sites or combinations near the chosen point of connection were sufficient to that the accommodate a 500MW utility-scale scheme and because of the br multiple ownerships would render the scheme unviable. South Nor That again assumes the answer....             | lection Assessment nd ES Volume 1, Chapter ble Alternatives and ution [APP-041] set out Applicant undertook a review ownfield registers prepared by folk and Broadland District Breckland Council, Mid istrict Council and East ouncil within a 20km search both the initial Norwich Main n and from the confirmed Connection. Consideration given to commercial rooftops search area....                                                                                                | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-173 | Conflict with the applicant's own cited Holford and Horlock principles The applicant relies on the Horlock Rules and cites the Holford Rules. Those rules include the principle that, where country is flat and sparsely planted, high-voltage lines should as far as possible be kept independent so as to avoid concentration of lines or 'wirescape'....                                                                                                                       | Section III of the Horlock Rules addresses the amenity issues associated with the siting and design of new substations. The Applicant draws attention to the fact that Rule 6 of the Holford Rules (which concerns the avoidance of concentrations of high-voltage lines with smaller lines, converging routes, distribution poles and other masts, wires and cables in flat and sparsely-planted country) is a guideline relating to the routing of new high-voltage overhead lines.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-174 | Grid Connection Statement (APP/7.12): technical feasibility is not proof of need, and the document exposes continuing uncertainty in deliverability, design and BESS reliance The Grid Connection Statement does not establish any independent planning need for East Pye Solar....                                                                                                                                                                                               | The Applicant notes this comment. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale. The suite of National Policy Statements (NPSs) for energy confirm that substantial weight should be given to the need for low                                                                                                                   | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                          |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | carbon generation schemes to which the NPSs are of relevance, such as the Scheme....                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                      |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                                                |
| BEPS-175 | Indeed, the most significant point in APP/7.12 is that it reveals a material difference in certainty between the solar and storage elements of the scheme. The statement expressly confirms that the solar component has secured Gate 2, but that the BESS element has secured only Gate 1 prioritisation....                                                                                                                                                                                                    | The Applicant notes this comment. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. The policy and planning balance for the Scheme is set out in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Applicant notes that solar and storage schemes, both separately and co-located, are supported in national policy....                                                                                                                                                      | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-176 | The statement also shows that land rights for the grid connection are not yet secured. For the Cable Route Corridor, all freehold owners and tenants have been contacted, an indicative corridor has been discussed, and heads of terms have been issued, but negotiations are continuing. For the National Grid substation and overhead transmission works, the applicant says it is pursuing voluntary agreements but will also be seeking compulsory acquisition and temporary use powers through the DCO.... | The Applicant is seeking to acquire the rights necessary for the grid connection elements of the Scheme by voluntary agreement where possible. In order to ensure that the Scheme is deliverable, compulsory acquisition powers are also being sought in parallel. This approach is typical for nationally significant infrastructure projects....                                                                                                                                                                                          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-177 | Conclusion Taken together, these defects show that Chapter 5 and the SSA do not amount to a lawful or robust assessment of reasonable alternatives. The applicant began from a false premise, namely the viability of Norwich Main. When that premise failed, it did not restart the exercise but re-engineered the scheme around a new Great Moulton substation designed to preserve sites already assembled through willing- landowner enquiries....                                                           | The points raised in this section of the relevant representation regarding a revised alternatives assessment are addressed in the following responses: 1. Please see BEPS-161, BEPS-162 and BEPS-167. 2. Please see BEPS-166. 3. Please see BEPS-165. 4. Please see BEPS-169. 5. Please see BEPS-171, BEPS-173 and BEPS-164.                                                                                                                                                                                                                | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |
| BEPS-178 | Remedies sought BEPS requests that the Examining Authority and Secretary of State give substantial weight against the application on the basis that the reasonable alternatives case is materially deficient....                                                                                                                                                                                                                                                                                                 | The points raised in this section of the relevant representation regarding a revised alternatives assessment are addressed in the following Applicant Responses: 1. Please see BEPS-161, BEPS-162 and BEPS-167. 2. Please see BEPS-166. 3. Please see BEPS-165. 4. Please see BEPS-169. 5. Please see BEPS-171, BEPS-173 and BEPS-164.                                                                                                                                                                                                      | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-179 | Chapter 6 – Climate Change Introduction East Pye Solar's climate change case does not provide a reliable basis for concluding that the Scheme is climate- resilient, that its claimed climate benefit is robust, or that it would not worsen climate-related risks for the receiving environment. Chapter 6 now includes lifecycle greenhouse gas assessment, a climate risk and resilience section, and a high-level in-combination summary, but that does not resolve the underlying defects....               | ES: Chapter 6 Climate Change [APP- 042] provides a comprehensive assessment following IEMA guidance. Climate Resilience: Section 6.9.140 onwards presents a detailed Climate Change Resilience Assessment using UKCP18 projections to 2080s under RCP 8.5. Site-specific risks including flooding, heatwaves, drought, and extreme weather are addressed through embedded design measures. Tables 6.36, 6.37 and 6.38 summarise how each identified climate risk is mitigated across construction, operation and decommissioning phases.... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-180 | Structural inadequacy of the climate assessment A lawful climate assessment for a project of this scale should address both principal limbs of climate change assessment: first, the project's own greenhouse-gas implications across its whole life; and second, the vulnerability of the project, surrounding communities, land, water environment, agriculture and ecosystems to present and future climate conditions....                                                                                    | The Applicant respectfully disagrees that ES Volume 1, Chapter 6: Climate Change [APP-042] fails to provide a reliable basis for assessing the Scheme's climate impacts and resilience. The assessment addresses both principal limbs of climate change assessment required by NPS EN-1: the project's GHG implications across its lifecycle, and the vulnerability of the Scheme and receiving environment to present and future climate conditions....                                                                                    | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-181 | Failure to demonstrate climate resilience in the receiving environment PINS accepted scoping out a standalone CCRA only on the basis that the ES should explain how the proposed development had been designed to be resilient to climate change risks, and expressly drew attention to Natural England's comments about how the development may exacerbate climate change impacts to the natural environment. The chapter's resilience response is weak....                                                     | In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant notes that PINS agreed to scope out a CCRA (see Table 6.1, ID 3.19.2) acknowledging that climate hazards will be managed through the CEMP during construction with mitigation through embedded infrastructure design and relevant health and safety practices enforced....                                                                                                                                                                                               | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-182 | Failure to assess whether the Scheme itself would worsen local climate-related risks The chapter does not provide quantified or site-specific modelling of how extensive panel coverage, substations, BESS infrastructure, compounds, access tracks and other hard or compacted surfaces may alter runoff pathways, intensify localised flooding, reduce infiltration, alter groundwater recharge, or worsen climate-related water hazards under more intense rainfall scenarios....                             | In ES Volume 1, Chapter 6 Climate Change [APP-042] the Applicant signposts in Table 6.11 reference to ES Volume 1, Chapter 9 - Water Environment [APP-045], ES Volume 1, Chapter 11 -Transport and Access [APP-047], ES Volume 1, Chapter 15 - Soils and Agriculture [APP-051] and ES Volume 1, Chapter 16 - Ground Conditions [APP-052] of which designated chapters consider and provide assessment of the Scheme with regards to surrounding land, ground conditions such as compacted surfaces and water environment....                | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                            |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-183 | Water vulnerability and water-resource resilience are central, not peripheral Water vulnerability is one of the strongest climate objections. The Scheme is in an area of water stress. The scoping material records that Anglian Water is subject to licence reductions and that its WRMP24 position is that it may not be able to supply all new non-domestic demands until new strategic supplies are developed....                                                                                                             | In ES Volume 1, Chapter 6 -Climate Change [APP-044] the Applicant provides a quantified value for operational water demand over the Scheme lifespan that is considered a typical figure having been derived from a standardised approach. Therefore, the Scheme's operational water demand is not dissimilar from alternatives proposed and is comparable with other solar NSIP....                                                                                                                                                        | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-184 | The climate case is overly dependent on the BESS The chapter's operational GHG table shows that BESS replacement is by far the dominant source of operational emissions: 1,034,103 tCO <sub>2</sub> e, or 93.59% of total operational emissions. The chapter also assumes a BESS capacity of 2,000 MWh and says it could deliver substantial additional carbon savings, while acknowledging that the exact nature of the emissions used to charge it has not been fully assessed. That creates a major methodological weakness.... | A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Paragraph 6.9.3 of the Statement of Need [APP-206] explains that "Solar schemes may be developed as standalone schemes or may be co- located with storage or other generation technologies....                                                                                                                | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-185 | Whole-life carbon benefit remains unproven and assumption-led The chapter now includes quantified construction, operational and decommissioning GHG estimates, but that does not make the claimed climate benefit robust. The chapter itself says estimated emissions are based on current best available baseline data and assumes current carbon values for replacement components even though these may change....                                                                                                              | Information relative to product lifecycles is determined by the manufacturer with associated replacement periods calculated based on the Scheme lifespan and subsequently accommodated for. ES Volume 1, Chapter 6 - Climate Change [APP-042] considers conservative yet reasonable worst- case approaches. The assessment has incorporated assumptions that err on the side of caution, ensuring that the reported carbon emissions profile is not understated for the Scheme....                                                         | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.    |
| BEPS-186 | The chapter fails to assess the climate impact without the BESS This deserves separate emphasis. The chapter openly states that the BESS is assumed to support the solar part of the Scheme and calculates additional BESS-related carbon savings, although those savings are not included in the primary GHG total to avoid double counting. It nevertheless says it is important to acknowledge the significant climate change mitigation potential of integrating the BESS....                                                  | The Applicant refers to its response to BEPS-184.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-187 | Baseline and comparison choices understate uncertainty The chapter's carbon logic depends on a comparison against future electricity-system carbon intensity and on contextualisation against carbon budgets. It may be presented as conservative in parts, but it also masks uncertainty. For example, the BESS savings calculation excludes BESS replacement emissions from the operational intensity comparator and does not fully assess charging emissions. That is a selective treatment of the comparator....               | The Applicant refers to its response to BEPS-182 and BEPS-184.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-188 | Cumulative climate effects remain inadequately assessed PINS did not agree that cumulative climate effects could be scoped out. It required the ES to consider how other developments cumulatively may affect the vulnerability of the development to climate change, including changes in flood flows, and cumulative GHG emissions or savings. The chapter's cumulative response remains inadequate....                                                                                                                          | The Applicant refers to its response to BEPS-179 and BEPS-180. In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant also signposts to ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] in Section 6.5.9 and Section 6.12.3 onwards and in response to PINS (see Table 6.1, ID 3.19.3), highlighting that in- combination climate change effects have been considered alongside other topics for the Scheme....                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-189 | In-combination climate effects are fragmented across the ES PINS agreed that a separate in-combination climate chapter could be scoped out only because the relevant climate factors would be assessed through other relevant topics, and Chapter 6 should signpost where those factors were assessed. In practice this fragmentation still creates a defect....                                                                                                                                                                   | The Applicant refers to its response to BEPS-181.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-190 | Secured adaptation and mitigation remain weak The chapter relies extensively on embedded and future management measures. But adaptation needs to be real, project-specific and secured, not left at a high level. Earlier project material already identified this problem: mitigation and adaptation were weak or deferred rather than clearly secured through the DCO. The same concern remains....                                                                                                                              | 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 - O... | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                            |
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| BEPS-191 | Decommissioning is still uncertain and only partly resolves the scoping issue PINS required decommissioning GHG emissions to be characterised. The ES now does that but wider decommissioning uncertainty remains relevant to climate and resilience. The LLFA noted that decommissioning appeared only partial, with some infrastructure remaining, and that it was not clear whether access tracks may be retained or whether the site would be returned to previous use and condition....                             | A preliminary assessment of the potential GHG emissions during decommissioning is provided in ES Volume 1, Chapter 6 Climate Change [APP-042] Section 6.5, with Section 6.9 onwards outlining further details for the decommissioning phase of the Scheme. Table 6.1 (PINS ID 3.19.1) reiterates that this element has been scoped in at PINS' request and also signposts the above Sections. In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant highlights Section 6.8.14 with reference to Outline DEMP [APP- 198]....      | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.    |
| BEPS-192 | Conclusion Chapter 6 should not be treated as establishing a reliable climate case for the Scheme. It remains too narrow, too fragmented and too dependent on optimistic or insufficiently tested assumptions. It does not robustly assess whether the Scheme would worsen local climate- related risks, does not adequately integrate East Anglia's water stress into climate resilience, does not properly assess cumulative climate burden, and does not test the project's climate balance without the BESS....      | The Applicant refers to its response to BEPS-179, BEPS-180, BEPS-182, and BEPS-184. Data inputs utilised in ES Volume 1, Chapter 6 - Climate Change [APP- 042] are adopted from manufacturer's indicative specifications (e.g. PV panels) and are comparable to those utilised on similar solar NSIPs, thus limiting any optimistic or insufficient assumptions associated with this Scheme, instead deemed as unnecessary or unwarranted....                                                                                                 | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.9 Climate Change and Greenhouse Gases - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-193 | Remedies sought The Applicant should be required to provide a revised and integrated climate assessment before the climate case is afforded material weight. That revised assessment should include: a with-BESS and without-BESS climate comparison; transparent and fully evidenced whole-life carbon modelling; proper assessment of water-resource resilience and confirmed water supply; quantified modelling of runoff, infiltration, groundwater recharge and off-site flood implications under future climat.... | The Applicant refers to its response to BEPS-182, BEPS-184, and BEPS-188. It is acknowledged in ES Volume 1, Chapter 6 - Climate Change [APP- 042] the Applicant signposts that the Scheme's construction mitigation measures are set out in Outline CEMP [APP- 196] (see Table 6.1 and Section 6.4.10 onwards), the operational measures are set out within the Outline OEMP [APP-197] (see Section 6.8.2 onwards), and the Scheme's mitigation measures for decommissioning phase are referenced in Outline DEMP [APP- 198] (see Sectio.... | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                       |
| BEPS-194 | Chapter 7 – Landscape and Visual Effects BEPS objects to the proposed development on landscape and visual grounds. Chapter 7 and its supporting appendices do not provide a reliable or complete basis for concluding that the scheme's landscape and visual effects are acceptable....                                                                                                                                                                                                                                  | The Applicant does not agree with the assertion that ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and its supporting appendices do not provide a reliable or complete basis for assessing the landscape and visual effects of the Scheme. The Landscape and Visual Impact Assessment (LVIA) has been undertaken by Chartered Landscape Architect in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)....                                                                          | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-195 | Failure to assess the landscape as an interconnected historic and lived environment The receiving environment is not a generic tract of agricultural land. It is an interconnected rural landscape composed of open plateau farmland, tributary valleys, wooded horizons, hedgerows, scattered farmsteads, villages, lanes, public rights of way, heritage assets and dark rural skies....                                                                                                                               | The Applicant does not agree with the comment that ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] failed to assess the landscape as an interconnected and lived environment. The assessment recognises the landscape as a complex and interconnected environment comprising physical, cultural, historic and perceptual characteristics....                                                                                                                                                                                          | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-196 | Unlawful or irrational fragmentation of landscape, heritage, residential and visual assessment A major flaw in Chapter 7 is fragmentation. Appendix 7.2 expressly includes heritage assets and recreational assets as relevant landscape receptors, but then repeatedly removes conservation areas, listed buildings and registered parks and gardens from the substantive landscape assessment on the basis that they are considered further in Chapter 10. This is methodologically unsound....                        | The Applicant does not agree that the assessment has unlawfully or inappropriately fragmented the consideration of landscape, heritage, residential and visual effects. The assessment has been undertaken in accordance with established Environmental Impact Assessment (EIA) and LVIA practice, which recognises that landscape, visual, heritage and residential amenity effects are distinct topics requiring separate assessment methodologies, whilst also acknowledging the interaction between them....                              | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-197 | Inadequate study area and underassessment of effects beyond 2 km The chapter adopts a variable study area of 3 km from the National Grid substation and 400 kV substations, 2 km from the sites and BESS, and 1 km from the cable route corridor. That remains too constrained for a scheme with panels up to 4.5 m, major substation infrastructure up to 15 judg m, and a distributed footprint across open plateau and natu valley-edge landscapes....                                                                | The Applicant does not agree that the study area adopted for the LVIA is inadequate or that effects beyond 2 km have been underassessed. The extent of the study area was determined through professional ement, taking account of the scale, re and likely visibility of the me, and is considered ortionate. The assessment adopts riable study area comprising 3 km the National Grid Substation and ubstations, 2 km from the r sites and BESS, and 1 km from cable route corridor....                                                    | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-198 | Downplaying of baseline sensitivity The applicant's own baseline material describes a more sensitive receiving environment than the final evaluative judgments acknowledge. Appendix 7.2 identifies a landscape with expanses of tranquillity, dark skies, route- based recreational value, ancient woodland, veteran trees, important hedgerows, conservation areas, listed buildings and distinctive local character.                                                                                                  | The Applicant does not agree that the sensitivity of the receiving landscape has been understated. Landscape sensitivity has been assessed in accordance with the LVIA methodology, taking account of both the value of the landscape and its susceptibility to the type of development proposed....                                                                                                                                                                                                                                          | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                       |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                              |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
|          | Yet most individual sites are still assessed only as of medium sensitivity....                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                      |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                    |
| BEPS-199 | Site 1 and the BESS: exceptional landscape and visual harm Site 1 and the BESS stand out repeatedly in the applicant's own material as among the most harmful parts of the scheme. Appendix 7.3 states that at Year 1 the BESS site would experience a total change to some key landscape characteristics and be subject to Major Significant effects, reducing only to Moderate Significant at Year 15....                                                                                                              | The Applicant notes that the assessment identifies significant landscape effects associated with Site 1 and the BESS, as reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. However, the relevant representation does not accurately reflect the assessment conclusions....                                                                                                                                                                                                                                               | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-200 | Failure to assess night-time character, dark skies and tranquillity properly This is one of the clearest defects in the Chapter 7 suite. The Lighting Strategy confirms that the Order Limits fall within a rural dark landscape and are to be treated as E2 'Rural' for lighting purposes. It also confirms that some parts of the scheme lie within the darkest night-sky areas or transitional dark-sky zones....                                                                                                     | The Applicant does not agree that the assessment has failed to properly consider night-time character, dark skies or tranquillity. The baseline assessment recognises the presence of dark skies and tranquil rural landscapes within the Scheme area and these characteristics have informed both the Scheme design and the assessment process....                                                                                                                                                                                         | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-201 | Understatement of the visual consequences of 4.5 m tilting The Appl panels and engineered infrastructure assessments The solar arrays are not visually recessive features. They consequen are up to 4.5 m high and tilting, and must be assessed as LVIA has large, repetitive industrial structures across open farmland. and assoc Appendix 7.8 confirms that 4.5 m is the height assumed in their act the residential visual amenity work. including The applicant's own operational descriptions recognise that a... | cant does not agree that the t understates the visual ces of the Scheme. The assessed the solar arrays lated infrastructure based on ual scale and characteristics, panel heights of up to 4.5 m . The assessment does not development as a visually or insignificant land use or does it characterise the mply as an agricultural use. The assessment did not refer to the Scheme as a "field use"....                                                                                                                                     | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-202 | Public rights of way, route experience and recreational harm Appendix 7.9 is highly damaging to the applicant's case. It confirms that the effects on PRoWs are not incidental, but extensive and repeated....                                                                                                                                                                                                                                                                                                           | The Applicant acknowledges that the assessment identifies significant visual effects for users of certain PRoWs, particularly during the construction phase and, in some locations, there is significant effect in Year 15. also recognises the High vity of recreational receptors, rs of the Boudicca Way a Way. of routes during construction re temporary, there is not nt closure of PRoW within the The Applicant disagrees that Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP- 149] demonstrates that recrea... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-203 | Understatement of residential visual harm Twenty residential properties were identified within 100 m of the maximum development parameters, across multiple sites. The applicant then used a narrow methodology and only carried two properties forward to detailed assessment, even though the wider residential receptor plan shows numerous named properties in close proximity to Site 1, the BESS, Site 2, Site 3, Site 5, Site 7, Site 8 and Site 9....                                                            | The Applicant acknowledges that the RVAA identifies significant adverse visual effects for certain residential receptors. In particular, significant effects are predicted for upper-floor views from 22 Hillcrest Court at Year 1 and Year 15, and for first-floor views from Oakdene Cottage at Year 1....                                                                                                                                                                                                                                | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-204 | Overreliance on future planting and assumption-led mitigation This is a recurring weakness across the landscape chapter and appendices. Appendix 7.3 shows that even on the applicant's own case, significant adverse effects remain in important district landscapes at Year 15, including B1 Tas Tributary Farmland and E2 Great Moulton Plateau Farmland, as well as Site 1 and the BESS. Appendix 7.8 similarly relies on future hedgerow and woodland planting to reduce residential effects by Year 15....         | The Applicant notes the concerns regarding the effectiveness of proposed mitigation measures. The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS- 032]....                                                                                               | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-205 | Trees, hedgerows, ancient woodland and arboricultural The Appl constraints trees an The Preliminary Arboricultural Impact Assessment confirms practicable, taken in that the Order Limits and associated works lie within a landscape strongly structured by mature trees, hedgerows, process. The Paramete woodlands and veteran features, including six ancient [APP-213 woodland areas (several of which are SSSIs) abutting the Order Limits and numerous ancient or veteran trees....                               | icant is committed to retaining d hedgerows as far as with trees and hedgerows to consideration in the design Design Principles, rs and Commitments ] sets out the minimum offset ithin the design for the woodlands, veteran trees, d hedgerows that will be ....                                                                                                                                                                                                                                                                          | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-206 | Site 10, Ditchingham Hall and the Broads-facing eastern The Ap character seam locate Site 10 has been underplayed. Appendix 7.2 describes Site landscape and bounda 10 as highly tranquil, enclosed in places by hedgerows, belts tree belts and woodland blocks, with Pound Lane and is sit Wash Lane forming sunken, enclosed route                                                                                                                                                                                    | plicant agrees that Site 10 is d within a highly tranquil is enclosed on most ries by dense hedgerows, tree and woodland features. The site uated between Woodton and exhibits a degree of ure that contributes to its local ape character. r, the Applicant disagrees with serton that the assessment has tated the sensitivity of Site 10. landscape character areas and adjacent to which the                                                                                                                                            | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
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|          | features, and with a setting between Woodton and Seething....                                                                                                                                                                                                                                                                                                                                                                                                                                                     | site is d, namely LCA C2 Thurilton ary Farmland with Parkland and Chet Tributary Farmland, are ised as contributing to the he Broads an...                                                                                                                                                                                                                                                                                                                                                                                                 |                             |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                               |
| BEPS-207 | Airfields and aviation-related visibility The landscape material cross-supports the aviation objection. Appendix 7.4 acknowledges visibility of the National Grid substation and 400 kV substation into the long distance, including from Tibenham Airfield. The Lighting Strategy expressly identifies Tibenham Airfield as a receptor and states that pilots approaching the airfield may be susceptible to glare from both construction and operational lighting if not properly managed....                   | The Applicant acknowledges that ES Volume 3, Appendix 7.4 Visual Baseline [APP-121] identifies potential visibility of the National Grid Substation from some locations at longer distances, including the vicinity of Tibenham Airfield. However, the Applicant does not agree that the identification of Tibenham Airfield as a receptor demonstrates a significant landscape and visual effect or indicates that the landscape assessment has underestimated impacts....                                                                | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-208 | Cable route corridor effects are understated The cable route corridor is repeatedly treated as of lower susceptibility than the surrounding landscape evidence warrants. Appendix 7.2 describes CRC4, CRC6, CRC7, CRC9 and CRC13 as interacting with multiple field boundaries, PRoVs, local roads, heritage features, wetland or valley-edge characteristics and important hedgerows....                                                                                                                         | The Applicant does not agree that the susceptibility of the cable route corridors has been understated. Susceptibility has been assessed with regard to the nature, duration and reversibility of the proposed works, alongside the characteristics and value of the affected landscape receptors. The assessment recognises r construction activities, nching and traffic easures, may result in short-term effects....                                                                                                                   | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-209 | Decommissioning and long-term reversibility are overstated The Appclicant assessment Appendix 7.3 shows that decommissioning itself is of decommi assessed as materially harmful across multiple landscape units and sites. Significant or moderate adverse effects are long-term significant identified for the NCA, B1, E2, the BESS, Site 1, Site 4, Site 5, Site 7, Site 8, Site 9 and Site 10. So this is not a case where long-term reversibility can readily be relied upon to soften present-day harm.... | t does not agree that the overstates the relevance ssioning effects or relies on reversibility to diminish the ce of operational effects. It is acknowledged that ES Volume 3, Appendix 7.3 - Landscape Assessment [APP-120] identifies significant effects for certain receptors during decommissioning, the Applicant does not agree that these effects should be characterised as "materially harmful"....                                                                                                                              | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-210 | Inadequate and Potentially Misleading Photomontages and Visualisations The visual evidence relied upon in Chapter 7 should be treated with caution because the photomontages and visualisations appear to have been prepared predominantly from photography undertaken in summer conditions, when trees and hedgerows are in leaf and screening is at its seasonal maximum....                                                                                                                                    | The Applicant does not agree that the visual evidence is inadequate, misleading, or that it understates the likely visual effects of the Scheme. The visualisations and wirelines prepared for the assessment and presented in ES Volume 3, Appendix 7.6 - Visualisations [APP-135] have been produced in accordance with recognised industry guidance and have been developed to illustrate the Scheme from representative view locations agreed through consultation with South Norfolk Council....                                      | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-211 | Conclusion and remedies sought For all of these reasons, Chapter 7 should be given reduced weight. The applicant's own material demonstrates that the scheme would cause widespread significant adverse landscape and visual effects, serious route-based and residential harm in parts of the scheme, long-term harm to tranquillity, dark skies and rural character, and major transformation at Site 1 and the BESS....                                                                                        | The Applicant refers to its response to BEPS-194 to BEPS-210. The Applicant does not agree that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] should be afforded reduced weight, nor that the assessment is structurally flawed. The LVIA has been undertaken in accordance with established guidance and presents a transparent assessment of likely effects during construction, operation and decommissioning....                                                            | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-212 | Chapter 8 – Ecology and Biodiversity The scope This is not a case where a generally low-value site contains their meth through sc a few discrete ecological constraints that can be managed processes consultees through buffers, timing restrictions, outline management plans and later habitat creation. The Applicant's own documents show the opposite....                                                                                                                                                   | of ecological surveys and odologies have been agreed oping and consultation with relevant statutory . The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]. An assessment of potential effects of the Scheme on ecological receptors during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]....                      | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-213 | Policy framework and the mitigation hierarchy East Pye Solar's Ecology Chapter states that it is assessed against EN-1, EN-3, EN-5 and the NPPF, and that compliance with EN-1 requires application of the mitigation hierarchy of avoidance, minimisation, restoration and offsets. It also states that BNG is secured through the Outline LEMP and is treated as an inherent part of the Scheme....                                                                                                             | The 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 - O... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-214 | The Scheme lies across a continuous network of priority Embedded habitats detailed Parameter The Applicant's own priority habitat figure shows that the Order Limits are saturated with priority habitats rather than [APP-213] Volume 2, merely adjacent to them....                                                                                                                                                                                                                                             | design principles are within the Design Principles, s and Commitments and illustrated on ES Figure 4.1 - Indicative n [APP-059]. These include ndoff distance from ancient , at least 15m from , 10m from watercourses, imum of 10m buffer between ditches and solar PV h is double the approach of 5m very adopted in the design of envelopments....                                                                                                                                                                                      | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                  |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-215 | The baseline is incomplete and the botanical evidence is plainly inadequate The ecological baseline is not robust enough to support the conclusions reached. The most serious omission concerns botany. The Applicant's own extended habitat survey expressly says that it does not constitute a full botanical survey and does not provide accurate mapping of invasive plant species....                                                                                                                              | The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys are presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]. An assessment of potential effects of the Scheme on habitats during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]....                      | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-216 | Barbastelle bats make the whole Scheme ecologically exceptional The Applicant's own bat evidence is highly damaging to its case. The bat activity report records eleven records from the Norfolk Barbastelle Study Group relating to barbastelle maternity colonies within 2 km of the Order Limits, including Saxlingham Grove, Little Wood, Brooke Wood and Tyrrels Wood, with overlapping colony zones covering The Order the Scheme....                                                                             | 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]. Limits primarily consist of ly managed farmland habitats, timal value for commuting bat species. itats are subject to regular , tilthing, harvesting (often n at nighttime with large and uncontrolled spotlights), ecticide applications, and r spreading activities.... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-217 | Natural England's 2024 Definition of Favourable Conservation Status for barbastelle Two further documents materially reinforce the objection. First, the Norfolk Barbastelle Study Group's January 2025 report shows that the East Pye Scheme area lies within or abuts the 6 km Core Sustenance Zones of at least six barbastelle maternity colonies, identifies a newly confirmed maternity colony at Little Wood near Shotesham, predicts additional maternity colonies in Brooke Wood and Lower Spring Wood, and... | The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.5 and Appendix 8.6 specifically relating to bat surveys....                                                                                      | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-218 | More importantly still, East Pye is not just any species-rich bat site. The Applicant's own Chapter 8 states that the Order Limits and surrounding landscape support nationally important assemblages of foraging and commuting bats and that the site is located within multiple barbastelle core sustenance zones for maternity roosts; it also acknowledges that the site is well connected to off-site woodland and wetland habitats and likely provides supporting features such as hedgerows, tree lines, matu... | The Applicant refers to its response to BEPS-217.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-219 | The best available peer-reviewed evidence now shows that The Applicant ground-mounted solar can materially reduce bat activity BEPS-217 through habitat loss and fragmentation, especially in the very kinds of boundary and open-field habitats present at East Pye. The East Pye surveys then show that the site supports a nationally important bat assemblage, with barbastelle recorded everywhere, and that the main infrastructure areas themselves are used by barbastelle and other sensitive taxa....         | refers to its response to .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-220 | Ancient woodland, SSSI woods and irreplaceable habitats are a scheme-wide constraint The Applicant's own bat report states that there are 31 areas of Ancient Woodland Inventory woodland and four areas of lowland fen, totalling fourteen parcels, within 2 km of the Order Limits, and that these are irreplaceable habitats protected by the NPPF and the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024....                                                                               | The Applicant has avoided areas of ancient woodland and other irreplaceable habitat by confining the PV areas to arable farmland which has a lower biodiversity value. In addition, buffers which have been set out in Design Principles, Parameters and Commitments [APP-213] will avoid direct and indirect impacts to these sensitive sites....                                                                                                                                                                        | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |

Table A5: BEPS entries BEPS-221 to BEPS-275

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                  |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-221 | Dense Network of Statutory and Non-Statutory Sites Embedded de Confirms the Sensitivity of the East Pye Landscape detailed w/ Figures 8.2 and 8.3 show that East Pye Solar is not located Parameters [APP-213] a in an isolated or low-sensitivity agricultural area. On the Volume 2, F contrary, the Order Limits sit within a dense and Masterplan overlapping network of statutory and non-statutory a 30m stand ecological sites....                                                                              | sign principles are thin the Design Principles, and Commitments nd illustrated on ES igure 4.1 - Indicative [APP-059]. These include off distance from ancient least 15m from 10m from watercourses, buffer between itches and solar PV which is double the of 5m very opted in the design of elopments. These buffer be managed for biodiversity, and mosaic, hedgerow s, tree planting all ith long-term management efit of biodiversity, as detailed within the Outline LEMP [APP-199]....                       | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-222 | Second, the mapped pattern strengthens the case on bat connectivity and fragmentation, especially for barbastelle. The surrounding network of woodland sites, verges and wildlife sites corresponds closely to the kind of connected rural structure relied upon by commuting and foraging bats. In that context, the fragmentation of hedgerows, repeated cable corridor crossings, highway works, lighting and other infrastructure impacts cannot be treated as minor or localised....                              | The Applicant refers to its response to BEPS-064.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-223 | Failure to Assess Hedgerow Network Fragmentation and Bat Connectivity The Applicant's Hedgerow and Tree Protection Order Plan demonstrates that the Scheme will result in extensive and repeated intervention within the existing hedgerow and tree network across the Order Limits....                                                                                                                                                                                                                                | The Applicant refers to its response to BEPS-064 which provides details on stand-off distances from hedgerows and highlights the Outline LEMP [APP-199] which provides details on the long-term management of hedgerows to enhance their structural integrity and botanical diversity to promote ecological function. Furthermore the Biodiversity Net Gain report [APP- 218] demonstrates that the project has the potential to deliver 290.03 hedgerow units, an increase in 31.35% from the current baseline.... | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-224 | Furthermore, the plan does not assess the construction- phase degradation of hedgerow function, including the effects of lighting, noise, vibration, and adjacent ground With regar disturbance. Hedgerows located alongside haul routes or hedgerows construction corridors will be subject to significant edge fields whi effects and disturbance, further reducing their suitability as commuting features even where physically retained. sowing, an year, some The cable route is of particular concern....       | The Applicant refers to its response to BEPS-221 and BEPS-223. ds to edge effects the tend to border agricultural ch are subject to ploughing, d harvesting throughout the of which are carried out at re is also no standoff rom hedgerows during icultural processes unlike oposed for the Scheme....                                                                                                                                                                                                             | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.11 Lighting - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-225 | Accordingly, the Applicant has failed to properly assess or mitigate a fundamental ecological impact arising from the fragmentation of hedgerow networks. This omission is particularly significant given the confirmed presence of a nationally important bat assemblage and the ubiquitous distribution of barbastelle across the Order Limits....                                                                                                                                                                   | The Applicant refers to its response to BEPS-221.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-226 | Chalk streams, hydrological connectivity and aquatic ecology are not capable of being screened away The aquatic evidence reinforces the same conclusion. The Applicant's Ecology Chapter notes that the River Tas is a chalk stream priority habitat and a focus of Environment Agency activity....                                                                                                                                                                                                                    | The Applicant refers to its response to BEPS-083 and BEPS-087.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-227 | White-clawed crayfish sensitivity is real and the Applicant's baseline is not sufficient The white-clawed crayfish issue alone should have triggered a much more precautionary approach. The Ecology Chapter records an Environment Agency white-clawed crayfish record approximately 6 km downstream on the River Tas and historic occurrence within the wider catchment. It accepts that appropriate biosecurity, pollution prevention and sediment control measures are needed to safeguard downstream habitats.... | The Applicant refers to its response to BEPS-087.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-228 | The aquatic baseline is limited, dry-condition biased and incomplete The Applicant's aquatic assessment contains significant limitations that prevent reliance on its reassuring conclusions. It says the appraisal is habitat-led; no macroinvertebrate sampling was undertaken; and several surveyed ditches and headwaters were episodic or ephemeral during dry conditions. The appendix nonetheless relies on connected-site data and habitat- based indications to infer likely assemblages....                  | The Applicant refers to its response to BEPS-083.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                  |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-229 | Farmland birds, field margins and stewardship-type habitats are part of the ecological network East Pye Solar's ecological desk study states that fields, hedgerows and grassland margins across the Order Limits provide nesting and foraging opportunities for red and amber listed farmland birds and LBAP species including skylark, turtle dove, corn bunting and reed bunting. This is important because the Scheme's field-margin and boundary works are not ecologically neutral....                            | The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.4 relating to breeding bird surveys. Turtle dove and grey partridge were recorded during breeding bird surveys, but not as a suspected breeder.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-230 | Other receptors reinforce the same conclusion The same desk study and survey material confirms suitability for other, water vole, great crested newt, reptiles, invertebrates, badger, brown hare and hedgehog. It also records invasive species issues including giant hogweed, Himalayan balsam and Japanese knotweed. These are not the main reasons this Scheme should be refused, but they reinforce the central point: East Pye Solar is proposed across a complex and already functioning ecological system....  | The Applicant refers to its response to BEPS-212.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-231 | The Outline LEMP and BNG cannot rescue a fundamentally misplaced scheme East Pye Solar seeks to rely on the Outline LEMP and BNG as embedded enhancement. It also claims substantial net gains in habitats, hedgerows and watercourses. But those claimed gains do not answer the real issue here. BNG is a metric-based habitat accounting exercise....                                                                                                                                                                | The Applicant refers to its response to BEPS-212.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-232 | Habitats Regulations implications The Shadow HRA recognises that where a project is likely to have a significant effect on a European site, Appropriate Assessment is required, and that the HRA process begins with screening followed by Appropriate Assessment if likely significant impact is identified....                                                                                                                                                                                                        | The Applicant would refer the reader to the Shadow Habitats Regulations Assessment [AS-036] which sets out screening and provides a justification why proceeding to Stage 2 Appropriate Assessment is not necessary given the absence of likely significant effects. The HRA process relates to qualifying species of the European designated sites and takes account of the pressures and threats to each.                                                                                                                 | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-233 | Why avoidance is the only policy-compliant outcome The cumulative picture is clear. East Pye's own documents show: • a continuous matrix of priority habitats across the Scheme footprint • national importance for bats, with barbastelle the third most abundant species and present at every sampled location • multiple nearby barbastelle maternity colonies and core sustenance zones covering the whole Order Limits • ancient woodland, lowland fen and other irreplaceable habitats in close relation to th... | The Applicant refers to its response to BEPS-083 and BEPS-087. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-234 | Conclusion East Pye Solar is proposed across a highly sensitive and interconnected ecological landscape. The Applicant's own evidence demonstrates nationally important bat sensitivity, priority habitat saturation, irreplaceable habitat proximity, chalk-stream and aquatic vulnerability, and an incomplete survey baseline, particularly for botany. On the Applicant's own policy basis, these circumstances require avoidance. The Scheme has not avoided them....                                              | The Applicant refers to its response to BEPS-083 and BEPS-087. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.                                                                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-235 | 8.17 Biodiversity Net Gain does not demonstrate ecological In line with acceptability the Biod The Applicant relies on the Biodiversity Net Gain Report to well-establish claim substantial biodiversity gains across habitat, habitats hedgerow and watercourse units, including 37.42% habitat demonstrate a gain, 31.35% hedgerow gain and 16.08% watercourse gain across the Site. across the Order Limits....                                                                                                      | the Environment Act 2021, iversity Net Gain metric is a ished tool to quantify and has been used as such to minimum 10% net gain The biodiversity gains he habits, hedgerows and reses presents the output from utory metric in tandem with an nt on the assessment of portant ecological features thin the Site. The assessment within the Site is presented S Volume 1, Chapter 8 – and Biodiversity [APP-044].                                                                                                           | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-236 | The BNG metric does not assess the ecological functions that make this site sensitive The BNG assessment measures habitats as metric units and expressly relies on habitat retention, enhancement and creation shown in the Outline LEMP and Green Infrastructure Strategy....                                                                                                                                                                                                                                          | The Applicant refers to its response to BEPS-235.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-237 | Existing habitats are artificially undervalued, while proposed habitats are inflated A major weakness in the BNG assessment is its treatment of strategic significance. The report states that all baseline habitats are assigned low strategic significance,                                                                                                                                                                                                                                                           | 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                                                                                                                                                                                                                                                                | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made        |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                         |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | while certain proposed post-development habitats are assigned high strategic significance if they align with LNRS opportunity mapping. This produces an artificial uplift in the post-development side of the ledger....                                                                                                                                                                                                                                                | and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]....                                                                                                                                                                                                                                                                                                                                                                                         |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        | there.                                                                                                                                                        |
| BEPS-238 | The BNG baseline does not reflect species-specific ecological reality The BNG report reduces the baseline largely to habitat groups such as cropland, grassland, woodland, scrub and watercourses. For the Sites, cropland alone accounts for 942.66 hectares, with grassland at 95.10 hectares and relatively small amounts of woodland, wetland and lakes....                                                                                                         | The Statutory Metric which is a recognised proxy measure for biodiversity is a widely used, and acceptable tool, used in England. The Biodiversity Net Gain Report [APP- 218] and accompanying Statutory Metric [APP-219] provides more detail on the methodology, assessment of baseline habitat condition, the assigning of baseline habitats to levels of strategic significance (as per the LNRS), and the proposed post development condition of newly created and enhanced habitats....                    | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-239 | The BNG assessment does not address fragmentation, lighting, disturbance or barrier effects The BNG document treats the BESS, substations and permanent access infrastructure as urban or artificial land uses within the metric. But it does not assess the ecological effects that those elements may produce beyond simple habitat conversion, including fragmentation, barrier effects, noise, lighting, reflective effects, or severance of movement corridors.... | The Applicant refers to its response to BEPS-238. The purpose of the BNG Assessment is to assign values to habitat which reflect their biodiversity value – not to address fragmentation, lighting, disturbance nor barrier effects. Such impacts are considered as necessary within ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].                                                                                                                                                                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.11 Lighting - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                        |
| BEPS-240 | Watercourse gains do not demonstrate protection of the River Tas system The report claims a 16.08% gain in watercourse units. But With resp the watercourse annex shows that the baseline condition of the reader m many reaches is only fairly poor or poor, that major riparian Chapter 8 encroachment is widespread, and that proposed 'enhancement' often does not improve the condition class at all....                                                           | The Applicant refers to its response to BEPS-238. ect to white clawed crayfish, ay consult ES Volume 1, - Ecology and Biodiversity [APP-044] which provides the results of the desk study and the absence of any white clawed crayfish records close to the Scheme.                                                                                                                                                                                                                                              | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-241 | The assessment relies heavily on assumptions and future management The BNG report states that the outcome is based on baseline surveys together with assumptions in the report, the Outline LEMP, the Green Infrastructure Strategy and the Hedgerow Removals Plan. It also states that no specific BNG consultation occurred. That is an important weakness....                                                                                                        | The Applicant refers to its response to BEPS-238.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-242 | The BNG case does not resolve decommissioning or repowering risk The BNG report is prepared for a scheme that includes construction, operation, maintenance and decommissioning. Yet the claimed gains depend on long- term habitat establishment and management. Elsewhere in the application, the scheme acknowledges operational replacement activity and eventual decommissioning....                                                                               | The Applicant refers to its response to BEPS-238.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-243 | Conclusion on BNG The BNG report may show a positive result within the Defra BEPS-238. metric, but it does not demonstrate that the Scheme is ecologically acceptable. The metric outcome is generated by a framework that does not assess species viability, landscape-scale bat function, hydrological sensitivity, disturbance pathways, fragmentation or the full value of existing stewardship-managed farmland habitats....                                       | nt refers to its response to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-244 | Objection to the Outline Landscape and Ecology Management Plan The Outline Landscape and Ecology Management Plan is not a secured, effective mitigation package. It is expressly an outline framework based on a preliminary design, with 'all details subject to further work and stakeholder engagement', and with the actual LEMP to be prepared later and approved pursuant to a DCO Requirement....                                                                | The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement post consent. The Outline LEMP is supported by the Green Infrastructure Strategy [AS-005], which provides detail on the proposed landscape and ecological measures across the Scheme. A final LEMP will be prepares prior to implementation of the Scheme and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032].... | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-245 | The document is expressly incomplete The OUTLINE LEMP repeatedly states that it is only a framework. The later LEMP is meant to supply the actual detailed proposal plans, species lists, planting densities, implementation timetables, management timetables and monitoring prescriptions. In other words, the details that determine whether mitigation works are not yet settled....                                                                                | The Applicant has provided a coherent strategy for post-consent landscape scale mitigation. The Outline LEMP [APP-199] will form the basis of the post consent strategy.                                                                                                                                                                                                                                                                                                                                         | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                  |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-246 | EN-1 requires mitigation to be secured and effective. The current EN-1 says applicants are encouraged to present biodiversity metric data in full as part of the application, and that the Secretary of State should use requirements and/or planning obligations to mitigate harmful aspects of development and, where possible, ensure conservation and enhancement of biodiversity. That policy does not support a position where the critical content of mitigation is left for later.... | The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Failure to comply with a Requirement of a DCO is a criminal offence.                                                                                                                                                                                                                            | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-247 | The OUTLINE LEMP is too generic for the actual ecological sensitivity of the East Pye landscape. The table of contents shows a standard suite of measures: woodland, linear tree belts, scrub, hedgerows, pollinator planting, tussocky grassland, neutral grassland, modified grassland, habitat boxes, skylark mitigation, ghost ponds and arable field margins....                                                                                                                         | The Outline LEMP [APP-199] will form the basis of the post-consent LEMP. The Applicant has considered impacts to host of receptors in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] and provided mitigation strategies during construction, operation, as part of long-term species management and during decommissioning....                                                                                                                                                                       | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-248 | BNG is built on the OUTLINE LEMP, but the OUTLINE LEMP is not fixed. The BNG report's claimed gains of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses depend on the Outline LEMP and related assumptions. But the BNG report itself acknowledges that the statutory metric is only a habitat proxy providing relative values....                                                                                                                                       | The Applicant would refer the reader to the responses BEPS-238. Further, the final LEMP will be in accordance with the Outline LEMP [APP-199] and will be secured by the DCO Consent such that the measures proposed will be implemented. Also, BNG is not mandatory for NSIPS but has been adopted by the Applicant to demonstrate its proposals to maximise biodiversity across the Scheme. In their Relevant Representation, Natural England [RR- 1412] welcome the intention to deliver a minimum of 10% BNG. | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-249 | The OUTLINE LEMP does not secure durable ecological benefit through the full life of the scheme. The OUTLINE LEMP states that management and monitoring duration will be defined in the later LEMP, but it also says that after decommissioning the landowners would choose how the land is to be used and managed, and that the landowner may return all the land to arable use, although some habitat areas may be left in situ. That is a serious weakness....                             | 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 LEMP [APP-198].... | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-250 | Deferred mitigation is legally risky. There is established authority that environmental defects may sometimes be cured later in a multi-stage process, but that depends on the statutory context and the nature of the defect. In the Habitats context, the courts have also made clear that mitigation cannot simply be relied upon at screening stage to avoid proper assessment....                                                                                                        | The construction, operation and decommissioning of the Scheme have been assessed in the ES [APP-036 to APP- 195], which also identifies mitigation measures. The outline management plans [APP-196 to APP-205] are designed with the objective of securing the relevant environmental mitigation measures set out within the ES. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the Draft DCO [AS-032]....             | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-251 | OUTLINE LEMP Conclusion. The OUTLINE LEMP should be given little weight. It is expressly incomplete, dependent on future detailed design, and relied upon to support both the ecology assessment and the BNG case before the critical details are known. It does not demonstrate secured and effective mitigation for the actual ecological receptors and landscape functions at East Pye Solar....                                                                                           | The Applicant refers to its response to BEPS-248.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-252 | Ecology policy conflict across the whole Scheme. The Applicant's own policy appendix (Vol 3 Appendix 2.3) makes the position clear. East Pye Solar says its Ecology Chapter is assessed against EN-1, EN-3, EN-5 and the NPPF, and that those policies govern biodiversity, HRA, water management and mitigation....                                                                                                                                                                          | The Applicant refers to its response to BEPS-063.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-253 | The same broad sensitivity exists in the aquatic The Appl environment. The Ecology Chapter and aquatic appendix BEPS-087 treat the River Tas system, Hemphall Beck and connected reaches as a hydrologically connected network. The Applicant records an Environment Agency white-clawed crayfish record approximately 6 km downstream on the River Tas and accepts that downstream habitats must be safeguarded by biosecurity, pollution prevention and sediment control....                | licant refers to its response to .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-254 | The Applicant's own desk study and bat material also show that irreplaceable habitats are a landscape-wide constraint, not an incidental edge                                                                                                                                                                                                                                                                                                                                                 | The Applicant refers to its response to BEPS-063                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy                                                      | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no                                                                 |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                  |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | issue. The bat appendix records 31 Ancient Woodland Inventory woodlands and four areas of lowland fen totalling fourteen parcels within 2 km of the Order Limits, noting that these are treated as irreplaceable habitats under the NPPF and the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024....                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                                                     | BEPS challenged.                                                                                                              |                                                                                                                                                                                                                                        | separate BEPS-specific determination is made there.                                                                                                    |
| BEPS-255 | The botanical position is itself a serious policy defect. The extended habitat survey expressly states that it does not constitute a full botanical survey or provide accurate mapping of invasive plant species. It also says the preliminary suitability assessment should not be taken as a full and definitive survey of protected species groups. Records of dominant and notable plants were only incidental to UKHab mapping....                                                             | The Applicant refers to its response to BEPS-212.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-256 | Against that background, the Applicant's reliance on the mitigation hierarchy is not persuasive. The Ecology Chapter says the Scheme complies with EN-1 by applying the hierarchy of avoidance, minimisation, restoration and offsets, yet in practice the Scheme depends on retention of 'the large majority' of hedgerows, generic exclusion buffers, CEMP controls and later habitat creation through the Outline LEMP and BNG. It also treats BNG as embedded enhancement within the Scheme.... | The approach taken for this project have adopted the mitigation hierarchy by establishing buffers to protect important ecological features, including designated sites, (SSSIs), ancient woodland, woodland, trees and watercourses. This approach is set out in the Design Principles, Parameters and Commitments [APP-213]....                                                                                                                                                                                                        | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-257 | Chapter 9 – Water Environment The East Pye Solar application raises serious and unresolved concerns in relation to the water environment. These concerns go to lawful assessment, public health, ecological risk, flood risk, water resources and the practical deliverability of the Scheme. They are not peripheral matters. They are central to whether this Scheme can lawfully and safely proceed. This is a highly sensitive and interconnected water environment                             | The Applicant notes this comment. Concerns raised from BEPS have been addressed in the responses to BEPS-015, BEPS-019, BEPS-021, BEPS-121 and BEPS-258.                                                                                                                                                                                                                                                                                                                                                                                | Ignored / noted only        | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                      | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-258 | The Scheme extends across multiple waterbodies and catchments, including the River Tas and Hemphall Beck chalk stream system, as well as Starston Brook, Broome Beck and the wider Waveney-linked drainage network....                                                                                                                                                                                                                                                                              | Potential impacts to the water environment from all phases of the Scheme have been identified within ES Volume 1: Chapter 9 – Water Environment [APP-045]. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors can be suitably managed and impacts are therefore assessed as 'Not Significant'.                                                                      | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-259 | The Planning Inspectorate required this chapter to be properly assessed, not deferred The Planning Inspectorate did not permit the applicant to treat these issues as minor. It required the ES to assess water resources in a water-stressed area, to provide an FRA, to undertake a WFD assessment or screening, and specifically to identify private water supplies and assess the potential impacts to those supplies and their buffers where significant effects could occur....               | The Applicant notes the concerns raised. Within, ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164], new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in place by Anglian Water to protect domestic water supplies....                                                     | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-260 | The treatment of private water supplies is one of the clearest and most serious defects. Private water supplies are among the most important receptors on this Scheme. They are not just environmental receptors. They are human health receptors. The Environment Agency's scoping response was explicit....                                                                                                                                                                                       | The assessment of risks to and impacts upon groundwater as a resource (including Private Water Supplies (PWS)) has been undertaken in accordance with the methodology agreed following Scoping, and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council....                                                                                                                                                                                           | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-261 | Figure 16.5 shows the scale of the private water supply The ES Vol problem, but only as a proximity exercise Phase 1 Gr Assessment Figure 16.5 shows the locations of private water supplies presents a using a 250m buffer around the BESS, 132kV and 400kV Assessment substations, and associated infrastructure....                                                                                                                                                                              | Figure 3, Appendix 16.1 - Ground Conditions [APP-184 to APP-186] Tier 1 Preliminary Risk (PRA) which includes of risks to groundwater as . The assessments have been in accordance with methodology agreed following use of a 250m Study Area around disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The Final Site Model presented in Figure 3, Appendix 16.1 - Ground Conditions [APP-184 to APP-186] refined through ground investigation.... | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-262 | A 250m buffer is not an assessment of hydrological or hydrogeological connectivity Groundwater and pollutant pathways do not stop at an arbitrary 250m circle. In an area underlain by Principal Aquifer and linked through superficial deposits, field drains, watercourses and topographic flow routes, risk                                                                                                                                                                                      | The Applicant refers to its response to BEPS-259 and BEPS-260.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                        |
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|          | depends on pathway and connectivity, not merely radial distance. The Environment Agency's earlier comments show why....                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                              |
| BEPS-263 | East Pye Solar has not demonstrated lawful protection of private water supplies. Under the Private Water Supplies (England) Regulations 2016, a private supply must not contain any substance at a concentration or value constituting a potential danger to human health, and the applicable risk assessment must establish whether such a risk exists, satisfy EN 15975-2, and take account of Water Framework Directive monitoring. The Applicant has not undertaken any equivalent receptor-specific assessment.... | The Applicant refers to its response to BEPS-259, BEPS-260 and BEPS-425. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186] will be refined through ground 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....                                                                                               | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-264 | The grid infrastructure is proposed over a Principal Aquifer and in sensitive water protection settings. The Flood Risk Assessment confirms that the BESS, National Grid Substation and Project Substations are located over a Principal Aquifer, on the catchment of the Waveney Chalk Stream, and that some are within Drinking Water Safeguard Zones. It says that impermeable membranes and controlled discharge will be used to mitigate residual pollution risk. That is not reassuring....                       | The principal aquifer beneath the Order Limits, private water supplies, including those in vicinity of Site 1 and the River Tas have been identified as receptors within ES Volume 1, Chapter 9 – Water Environment [APP-045]. The assessment of effects within this chapter are residual, as embedded mitigation is proposed as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] to manage the residual risk of impacts occurring....                                            | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-265 | The flood and drainage strategy remains outline and The Schemer deferred not have for the The applicant repeatedly relies on outline drainage detailed principles and future detailed design. The FRA states that once the the surface water drainage arrangements are indicative and will be subject to refinement at detailed design stage....                                                                                                                                                                        | me has Work Nos. and does a detailed design at this stage BESS and Substation areas. A drainage plan will be provided detailed design of the as been progressed and d, following the grant of the consented), as secured within irement 11....                                                                                                                                                                                                                                                                                            | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-266 | The LLFA has already said the applicant has underestimated impermeable area and not properly assessed infiltration or runoff effects The LLFA's consultation response is highly significant and supports objection rather than reassurance. It states that the applicant has under-estimated the impermeable area, has not yet assessed or investigated the ground conditions and the viability of infiltration, and has provided incomplete or inconsistent information....                                            | The Applicant notes this comment and is in discussion with the LLFA to address their concerns.                                                                                                                                                                                                                                                                                                                                                                                                                                            | Ignored / noted only        | No material new information                         | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                                      | §2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.      |
| BEPS-267 | Private sewerage There has been no mapping of private sewerage or impact assessment of changes to runoff effects on their ability to function. Private sewage arrangements are frequently at the same properties with private water supplies. If septic tanks and treatment plants cannot drain due to changes to ground water levels or flooding, then there is a significant risk that they will overflow or stop functioning....                                                                                     | The Applicant notes that private sewerage has not been mapped however records are unlikely to be widely available for the presence of these features. Notwithstanding this, the majority of the Order Limits will have solar panel installation. As set out in Section 8 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], solar panels will be raised above the ground on narrow supports with grass and/or wildflower meadow around/beneath them....                           | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-268 | The EA correspondence shows that important parts of the flood evidence base were incomplete or uncertain. Appendix B to the FRA shows that the EA's 31 March 2025 response could not provide flood levels for the Starston Brook area because there was no detailed local modelling there, and stated that the risk from fluvial flooding associated with the ordinary watercourse was unknown without a modelling exercise in the FRA....                                                                              | The Applicant notes that this comment relates to EA responses to the PEIR and further work and discussion has been undertaken with the EA since then. As set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the area of no model availability relates to the Starston Brook and the masterplan/Order Limits were updated so that areas of Flood Zones 2 and 3 associated with this watercourse are no longer within the Order Limits, and any works are set at signifi... | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-269 | The water resources case is also weak and reinforces the wider water objection The Water Resources Assessment confirms that the Scheme has potable and non-potable demand in construction, operation and decommissioning, and that, without embedded mitigation, the supply-demand balance cannot be achieved. It also records a separate minimum fire suppression allowance of 456m³. Anglia Water has not agreed to supply the project and it remains without a water source, relying on 'tankering'....              | The Applicant notes the concerns about water scarcity in the area. The Applicant has carried out a ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] with tankering identified as the preferred method of supply for potable water and water associated with fire suppression. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in place by Anglian Water to protect domestic water supplies....                                                                              | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-270 | The applicant's significance conclusions are not persuasive Receptor se within Tabl The ES summary table concludes that impacts on water supplies, Source Protection Zones, hydrological receptors Chapter 9 – and hydrogeological                                                                                                                                                                                                                                                                                      | nsitivity has been identified e 9.4 of ES Volume 1, Water Environment tigation has been included for all phases of the Scheme as set out in and secured by the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Where trenchless cable crossings                                                                                                                                                                                                                                                                | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                    | Audit classification | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                    |
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|          | receptors are negligible or low, and [APP-045], therefore minor and not significant. Embedded in Those conclusions are not convincing because the underlying assessment is not adequate....                                                                                                                                                                                                                                                                                                                             | interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196].                                                                                                                                                                                          |                      |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                          |
| BEPS-271 | The chapter fails to demonstrate lawful WFD and groundwater protection compliance The Environment Agency's scoping response required hydrogeological risk assessment where HDD or trenchless methods might interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors and required better understanding of ground conditions and groundwater-surface water relationships....                                                                                | 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]....                                                                                                                                                      | Answered             | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-272 | Significance of the Water Environment This is one of the most important chapters because it brings together several of the strongest objections to the The ES Vo Scheme: Phase 1 G Assessmen • The principal infrastructure is proposed in presents hydrogeologically sensitive locations....                                                                                                                                                                                                                           | Identification of, and assessment of risks to Private Water Supplies lume 3, Appendix 16.1 - round Conditions t [APP-184 to APP-186] a Tier 1 Preliminary Risk t (PRA) which includes t of risks to groundwater as e (including Private Water from existing contamination ound....                                                                                                                                               | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-273 | Statutory Consultation Response from EA The Applica would empha Nor are these concerns confined to points raised only by undertaken objectors. The Environment Agency's statutory section 42 whereby the response makes clear that substantial work still remained outstanding at PEIR stage and, on several issues, remains were satisfie modelling w only partially resolved even now. satisfied w The EA said that further information was required before it surface wat could provide a definitive response, an... | nt notes this comment and sise that discussion was in December 2025 EA confirmed that they d that further hydraulic as not required and were ith the principles of the er drainage arrangements. nt's view is that the EA's esentation is a request clarification. cussions are ongoing with ddress the comments h secured documents to be a later deadline to provide rification/commitment as y the EA....                     | Answered             | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-274 | In relation to private water supplies, the EA expressly recorded inconsistency in the number of private abstractions identified, stated that the assessment of risks to private abstractions could not be adequately undertaken, and required the applicant to provide more information on the location and source of private abstractions, including local authority records and known wells, adopting a precautionary approach if better positional data could not be obtained....                                    | As noted above, the Relevant Representations from the EA have been responded to within the Applicant's Response to Relevant Representations submitted at Procedural Deadline A. The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource....                                          | Answered             | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-275 | Outstanding matters identified by the EA and LLFA Although the application now contains more water-related documentation than was available at PEIR stage, comparison with the Environment Agency's section 42 response and the LLFA's consultation response shows that many of the principal concerns have not in fact been fully resolved. Some matters have been addressed only in form....                                                                                                                          | Discussions were undertaken with the EA pre-and post-PEIR (April 2025 and December 2025 respectively) and there was agreement on the scope of the assessment on flood risk and the principles of the surface water management including firewater runoff management. The Applicant notes that further information/clarification has been requested by the EA and the LLFA, and discussions are ongoing with these consultees.... | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |

**Table A6: BEPS entries BEPS-276 to BEPS-330**

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                  |
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| BEPS-276 | Likewise, the Environment Agency's concerns about pollution and firewater risk from the BESS and substations remain only partially addressed. The EA stated that there were no adequate measures to monitor and respond to pollutants from leaks and spills during operation at the BESS and substations, and no sufficient provision for control of firefighting runoff from substation fires, and required adequate lining, containment and pollution-control measures for all such infrastructure.... | The layout of the BESS is yet to be finalised however outline surface water attenuation requirements (including allowance for firewater runoff) has been included in ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Detailed surface water drainage is secured through DCO Requirement 11....                                                                                                                                                                                   | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-277 | The Planning Inspectorate's Scoping Opinion These outstanding concerns also map directly onto the Planning Inspectorate's own scoping requirements. The Inspectorate was clear that water resources could not be scoped out because the Scheme is located in an area identified as water stressed, and that the ES should assess the potential impacts of the development on water resources, including water supply and demand requirements during construction and operation....                       | The Applicant acknowledges the comments regarding the ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]. As part of this assessment, the various sources of water supply were assessed. Due to the water scarcity in the region, new groundwater or surface water abstraction options were scoped out....                                                                                                                                                                                                                 | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-278 | Most importantly for present purposes, the Inspectorate expressly noted that a number of private water supplies lie within 250m of the site, that accurate location and abstraction data were not available, and that the ES should identify the location of and assess the potential impacts to private water supplies and their buffers where significant effects could occur....                                                                                                                      | The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations....                                                  | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-279 | The same is true of the Inspectorate's requirement for WFD assessment. The Inspectorate said that, given the likely significant effects and uncertainty around watercourse crossings and impacts on WFD waterbodies, the ES should provide a WFD assessment or screening assessment and agree the approach and findings with the statutory consultees....                                                                                                                                                | The ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme, and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.                                                                                                                              | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-280 | Finally, the Inspectorate also expected that information on battery fire risk and relevant mitigation, including fire-fighting and containment measures on the environment, should be set out in the Outline Battery Safety Management Plan. The EA's later section 42 response shows that this too remained unresolved in substance....                                                                                                                                                                 | Since the preparation of the PEIR and EA Section 42 response to the PEIR, further detail on firewater runoff management containment measures has been provided both within the Outline Battery Safety Management Plan [APP-200] and Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. It is noted that the EA have requested further clarification/information on the responding to leaks and spills and discussions will be undertaken with the EA in due course.... | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-281 | For these reasons, the Examining Authority is requested to treat private water supplies, groundwater protection, flood risk, runoff, drainage and water resources as principal examination issues....                                                                                                                                                                                                                                                                                                    | The Applicant responds to each bullet point from the respondent in turn below: Private water supply assessment: An assessment has been undertaken of the risks to groundwater as a resource (including Private Water Supplies) from existing contamination in the ground....                                                                                                                                                                                                                                                             | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-282 | Chapter 10 Cultural Heritage Failure properly to assess the wider historic environment and historic landscape context The applicant's heritage assessment takes an unduly narrow approach to the receiving historic environment....                                                                                                                                                                                                                                                                      | The Applicant refers to its response to BEPS-285.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-283 | Second, APP/2.11 materially weakens the applicant's attempt to minimise cable-route and non-designated heritage impacts. The plan shows the corridor passing through areas with nearby listed buildings, conservation areas and HER records, rather than through neutral or low- sensitivity land. That is inconsistent with any suggestion that the cable route can safely be treated as a minor, temporary or narrowly localised heritage issue....                                                    | Statutory or Non-Statutory Sites or Features of Historic Environment Plan [APP-015] does illustrate non-designated heritage assets recorded by Norfolk Historic Environment Record both within and immediately adjacent the Order Limits....                                                                                                                                                                                                                                                                                             | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-284 | Overview The cultural heritage case for East Pye Solar remains materially flawed. Although the Environmental Statement is fuller than the PEIR, the applicant's own documents continue to show a heritage assessment built on aggressive scoping-out, a visibility-led methodology, heavy reliance on                                                                                                                                                                                                    | The Applicant considers that ES Volume 1, Chapter 10 – Cultural Heritage, which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] have been undertaken in accordance with the appropriate                                                                                                                                                                                                                          | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit classification | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                    |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | future planting and year-15 conditions. incomplete definition of archaeological impacts, and substantial deferral of mitigation into later design stages....                                                                                                                                                                                                                                                                                                                                                           | legislation, policies and guidelines and provides a historic and archaeological narrative of the landscape both within and adjacent the Order Limits....                                                                                                                                                                                                                                                                                                                                                                                 |                      |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                          |
| BEPS-285 | The applicant's own methodology is too narrow, too elimination-led and too dependent on visibility filtering. The Heritage Statement confirms that the applicant began with desk study, viewshed analysis and site visits and then used that process to scope out most assets before detailed assessment. It expressly says that only 51 designated assets and two non-designated assets were ultimately scoped in. That is the central methodological flaw....                                                        | The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] was agreed with all statutory consultees at PEIR stage. It is correct that the Heritage Statement first began with desk study, viewshed analysis, and then site visits in order to determine which designated and non-designated-built-heritage assets would require further assessment....                               | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-286 | The wider historic environment has been underassessed as a landscape-scale receptor. The applicant's own mapping directly undermines the narrow receptor list. APP/2.11 and Figure 10.1 show that the Order Limits and cable route corridor lie within a dense spread of HER records as well as designated assets. The legend expressly includes HER points, HER polylines and HER polygons, demonstrating that the mapped historic environment is much broader than listed buildings and conservation areas alone.... | The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] was agreed with all statutory consultees at PEIR stage....                                                                                                                                                                                                                                                                | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-287 | Conservation areas and non-designated heritage remain materially underassessed. The treatment of conservation areas remains one of the clearest weaknesses. Historic England identified a number of named conservation areas requiring attention, including Brooke, Saxlingham Green, Hempnall, Fritton and Wacton. At PEIR stage, PINS had already required robust treatment of conservation areas and long-view receptors....                                                                                        | Brooke, Saxlingham Green, and Fritton Conservations were included for assessment in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. As noted within the ES Chapter, Hempnall and Wacton Conservation Areas were assessed, and it was determined that they were not considered sensitive to the Scheme and were therefore scoped out of further assessment....                                                                              | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-288 | The cable route corridor remains inadequately assessed and is still being defined too late. The cable route is a major unresolved heritage weakness. The ES chapter says a 500m study area from the CRC boundary has been adopted for all heritage assets. But the broader evidential picture still shows that important aspects of cable-route heritage impact and mitigation are being left to later stages....                                                                                                      | Historic England (et al. 2026) Archaeology and Solar Farms. Good Practice Guide notes in para. 2.4.4 that 'when a full mitigation scheme cannot be drawn up at the time of application submission, it will need to be secured by planning conditions/DCO Requirements. Where assessment and design work is continuing post-determination, that work should inform the final scheme of mitigation via conditions/Requirements. It is recommended that at least an outline approach to mitigation is set out at application submission.... | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-289 | Archaeology remains partly under-investigated and too Historic E much mitigation is deferred. Archaeology Practice G The Archaeological Mitigation Strategy openly 'when a full acknowledges that major archaeological matters remain to be drawn u unresolved....                                                                                                                                                                                                                                                     | ngland (et al. 2026) y and Solar Farms. Good uide notes in para. 2.4.4 that ll mitigation scheme cannot p at the time of application , it will need to be secured g conditions/DCO ts. Where assessment and k is continuing post- ion, that work should inform scheme of mitigation via /Requirements. It is d that at least an outline approach to mitigation is set out at application submission....                                                                                                                                  | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-290 | Preservation in situ is not a settled mitigation outcome but a conditional later-design response. The applicant places weight on preservation in situ, especially in relation to pile-supported panel structures. But the AMS makes clear that this is conditional, not fixed....                                                                                                                                                                                                                                      | The various below ground impacts of the Scheme have been discussed with NCCHES and have been used to inform ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. In consultation with NCCHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known. This will ensure preservation in proportion to the significance of archaeological remains present....                             | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-291 | Palaeoenvironmental and geoarchaeological issues remain unresolved, contrary to Historic England's advice. Historic England's statutory consultation response was explicit that palaeoenvironmental and geoarchaeological potential needed to be addressed....                                                                                                                                                                                                                                                         | The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of archaeological works will be carried out within the Scheme, including geophysical survey. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching....                                                                                                            | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-292 | The setting assessment systematically understates harm by relying on screening, selective framing and year-15 conditions. The heritage visual material shows how the low-harm case is actually being made. In the BESS-VL9 sequence, the winter baseline and year-1 images show large industrial elements inserted into an open rural view, while the year- 15 image depends on matured screening to                                                                                                                   | The Applicant notes the comments relating to impacts to heritage assets in the proximity of Site 1, Site 4 and Site 5 of the Scheme, as detailed in the representation, and these are addressed in detail in BEPS-293 – BEPS-297.                                                                                                                                                                                                                                                                                                        | Answered             | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                    |
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|          | suppress visibility....                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                             |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                          |
| BEPS-293 | Specific asset and place-based concerns Moulton Farmhouse and the Site 1 / substation area This is one of the clearest admitted cases of setting harm. The applicant accepts that footpath views associated with Moulton Farmhouse are of interest and will be largely obscured by the Project Substation. The visual material confirms that the change is real and experienced, not hypothetical.                                                                                       | In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-294 | Site 4, Stratton St Michael and Tasburgh Site 4 contains a particularly layered interaction of archaeology, setting and historic landscape. The group of Grade-1 Listed Stratton St Michael Church, The grade II* Old Rectory and its associated barn, are of particular importance. Also at site 4, trial trenching identified Roman- aligned field systems, Roman ovens, possible Roman structural remains, Beaker and Bronze Age activity, and medieval/post-medieval remains....     | Impacts to the five designated heritage assets situated south of Sub-Site 4B (one Grade I, one Grade II* and three Grade II Listed Buildings), were included in both ES Volume 1, Chapter 10 - Cultural Heritage [APP- 046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP- 165 – 168]. As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this group of heritage assets....                    | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-295 | Site 5 / Fritton Site 5A revealed evidence of ancillary manorial activity and medieval material, including pits and ditches with dumped material, medieval pottery and a possible cobbled surface. The views at Site 5-VL5 show the relationship between grade 1 Listed Church of St Catherine, associated listed buildings, Clay Cottage, The Street, PROWs and the adjoining open land....                                                                                             | The Applicant does not agree with the Consultee that the archaeological remains within Sub-Site 5A contribute to the character and appearance of Fritton Conservation Area, nor the significance of the Grade I Church of St Catherine (NHL 1373281) and Grade II Listed Church Farm buildings (NHL 1050259; 1050260), which lie within the northernmost part of the Conservation Area....                                                                                           | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-296 | Site 8 / Brooke-side parcels The geophysics identified a probable Late Iron Age ladder settlement and other enclosure systems. The later trenching identified Neolithic, Iron Age, Roman and medieval occupation, including a possible posthole roundhouse and a Roman pottery kiln. The Site 9 visibility mapping in the heritage appendices identifies Brooke Conservation Area and nearby listed buildings as viewed receptors. This is not low-sensitivity background land.          | The Applicant is assuming that the representation is referring to Site 9 rather than Site 8 here, with Site 9 the closest elements of the Scheme to Brooke. The Applicant does not agree that the archaeological remains within Site 9 contribute to the character and appearance of Brooke & Kirstead Conservation Area, nor the significance of the Listed Buildings within its boundaries....                                                                                     | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-297 | Site 10 Site 10 is not merely a former RAF site or a peripheral archaeology parcel. It contains regionally significant early medieval pottery production remains, and the mitigation strategy itself accepts that negative development impact here would trigger excavation or preservation in situ. The heritage mapping also shows Site 10 in relation to built-heritage receptors including Seething Conservation Area and Ditchingham Hall.                                          | The Applicant agrees that the archaeological works carried out to date within Site 10 have revealed regionally significant remains relating to medieval pottery production, which is also acknowledged in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]....                                                                                                                                                                                              | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-298 | 11. Historic England's statutory consultation response remains highly relevant and is not fully answered by the ES Historic England's position at PEIR stage is important because many of its concerns remain only partly addressed. Historic England said further evaluation of non- designated archaeology was required, particularly in panel and substation areas, so that assets of policy-equivalent significance could be identified early and mitigated appropriately....        | ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] tabulates the consultations carried out with Historic England, NCC HES and the SNC Senior Heritage & Design Officer after the production of the PEIR, which are further detailed in the Consultation Report [APP-024]. The Applicant notes that in Historic England's most recent consultation letter dated 10th June 2026 (Ref....                                                                                            | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-299 | The applicant's case does not sit comfortably with the Planning Inspectorate's Scoping Opinion PINS required a robust justification for study areas and sensitive receptors, and required that assets and conservation areas with long views to or from the site be identified and considered. The applicant's methodology still narrows the field too aggressively. PINS stated that temporary construction compounds could not be ignored until locations and receptors were known.... | The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting documents ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] was agreed with all statutory consultees at PEIR stage. This includes all study areas, as well as heritage receptors....                                                     | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-300 | Cumulative and in-combination heritage effects are understated Historic England expressly said cumulative views across historic landscapes should be taken into account and named adjacent solar/BESS projects that should be included in cumulative assessment. PINS also required has been cumulative schemes to be properly agreed and mapped. Section This is important because the heritage harm at East Pye is Chapter 10 – not only asset-specific....                            | ES Volume 3, Appendix 2.4 – Cumulative Schemes (APP-116) notes that cumulative impacts to High Grove, The Drovers and Long Stratton BESS were considered, while Tasway Energy Park was not, as the Scheme placed on indefinite hold....                                                                                                                                                                                                                                              | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                              |
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| BEPS-301 | Conclusion Taken together, the applicant's own heritage documents show a case that is more developed than at PEIR stage but still materially deficient. The historic environment has been narrowed too aggressively; non-designated and conservation-area context has been underassessed; the cable route remains incompletely characterised; archaeological mitigation remains dependent on later surveys and later design; preservation in situ is conditional and not yet a settled outcome; palaeoenvironmental...  | The Applicant notes that the methodologies employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] were agreed with all statutory consultees at PEIR stage....                                                                                                                                                                                                                                            | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-302 | Remedies sought The Applicant should be required to provide, before examination proceeds materially on Chapter 10, a revised and fully integrated cultural heritage package that: finalises and evidences the cable route archaeological and heritage assessment; completes any outstanding geophysical survey, informative trenching and geoarchaeological/deposit-modelling work necessary to define likely impacts; revises the historic-landscape and setting assessment so that it is not visibility-led and pr... | The Applicant refers to its response to BEPS-283 and BEPS-287.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-303 | Chapter 11 - Transport and Access Introduction The Applicant has not demonstrated that East Pye Solar can be constructed, operated, repaired, repowered and eventually decommissioned without serious and inadequately resolved effects on the local highway network, the Public Rights of Way network, promoted walking routes, rural lanes, residential amenity and public safety....                                                                                                                                 | The transport and access strategy has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. ES Volume 3, Appendix 11.1 - Transport Assessment [APP- 174 to 177], the Outline Construction Traffic Management Plan (Outline CTMP) [APP-201] and the Outline Public Rights of Way and Permissive Paths Management Plan (Outline PRoWPPMP) [APP-203]....                                                                                                                                                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-304 | The transport and access solution remains outline only and depends on post-consent detail A central objection is that the transport and access case remains fundamentally deferred. The CTMP expressly states that the detailed CTMP will be produced later and that key matters will only be confirmed through detailed design or contractor appointment, including final construction activities, final internal haul route alignments, final CRC access arrangements, the final number of AIL movements, and furt... | The proposed management and mitigation measures for the Scheme are set out within the ES and secured through the suite of outline management plans submitted as part of the application. In relation to transport and access, the assessment and mitigation are set out in ES Volume 1, Chapter 11 - Transport and Access [APP-047], supported by ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177], the Outline CTMP [APP-201] and the Outline PRoWPPMP [APP-203]....                                                 | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-305 | The OTMP repeats the same approach for later life-cycle phases. It states that the detailed OTMP will be a 'live' document, updated before scheduled replacement activities, and that the vehicle trip estimates for replacement are indicative and will be refined later. It further states that if the current routes are no longer suitable, alternative routes will simply be agreed later with the highway authority....                                                                                           | The Outline Operational Traffic Management Plan (Outline OTMP) [APP-202] is intended to be updated prior to scheduled replacement activities. This reflects the operational life of the Scheme and the practical reality that replacement activities may occur several years after the completion of the construction phase....                                                                                                                                                                                                         | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-306 | The scheme relies on constrained rural roads which the The Local Applicant's own evidence describes as sensitive and assessed difficult Chapter 1 [APP-047] The Transport Assessment's own highway network Appendix description is highly revealing....                                                                                                                                                                                                                                                                 | Highway Network has been in detail in ES Volume 1, 1 - Transport and Access and ES Volume 3, 11.1 - Transport t [APP-174 to 177]. The recognises that some local rural in character, vary in d pose challenges with to two-way movements and strictions. These istics were identified at an ge and informed the nt of the access strategy sssessment of transport e design process, tion was given to limiting ion traffic movements through munities, including Hempnall, Brooke, and Saxlingham Nethergate, as far as practicable.... | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-307 | The baseline traffic flows on many affected roads are extremely low, which makes the local impact more serious, not less The Applicant's own ATC data records very low baseline traffic on many of the roads now proposed for scheme access, routing, restriction or management. The TA records an AADT of 82 on Fairstead Lane (west), 103 on Littlebeck Lane, 134 on Shotesham Road, 67 on The Green, 67 on Wash Lane, 53 on Bussey's Loke, 31 on Market Lane and 41 on Edge's Lane....                               | ES Volume 1, Chapter 11 - Transport and Access [APP-047] assesses the likely effects on the highway network from associated construction movements. The assessment methodology, as detailed in section 11.5 of the Chapter, is aligned with industry-standard IEMA Guidance for defining sensitivity of each respective link and measuring effects in relation to severance, delay, amenity, fear, safety and hazardous and large loads....                                                                                             | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-308 | The Applicant's own figures show major percentage increases on local roads The Transport Assessment expressly identifies significant percentage increases during peak construction. Table 9.2 shows 115.51% on Fairstead Lane, 57.98% on Shotesham Road, 44.76% on Bussey's Loke, 48.48% on Market Lane, 25.62% on Littlebeck Lane, 19.62% on Fylands Road and 18.01% on B1527 near Woodton....                                                                                                                         | The Applicant notes the concerns raised regarding forecast traffic increases on a number of local roads during the construction phase. The effects of construction traffic have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Whilst certain links exceed the initial IEMA screening thresholds, this forms part of the assessment process and triggers further detailed assessment....                                                                                                                | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                    |
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| BEPS-309 | The project requires an exceptionally high number of accesses, crossings and highway interventions The Outline CTMP identifies 65 construction access and crossing points to the Sites and CRC. It also states that highway works will support movement on narrower sections of the local road network and that constrained sections may require enhancement through passing places or temporary traffic management. The Access and Public Rights of Way Plan visually confirms the breadth of this intervention....     | The transport and access strategy has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 - Transport Assessment [APP- 174 to 177], the Outline CTMP [APP-201] and the Outline PRoWPPMP [APP-203]. The number of proposed construction access points reflects the geographic conditions of the Solar PV Sites and associated infrastructure. Where practicable, existing field access points have been utilised to minimise the need for new access arrangements....           | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-310 | The internal haul route strategy itself demonstrates the unsuitability of the local road network The Applicant presents internal haul routes and waiting points as mitigation. They are also evidence of an underlying access problem. The CTMP states that internal haul routes were proposed in response to consultation feedback from the highway authority and local residents to minimise impacts on the local road network....                                                                                     | The Applicant notes the comments regarding internal haul routes and management measures. As set out in Section 11.7 of ES Volume 1, Chapter 11 - Transport and Access [APP-174] construction routes were developed through an assessment of available routes to each Sub-Site, taking account of factors including settlements, existing access points, PRoW, highway restrictions and visibility requirements....                                                                                                                   | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-311 | The scheme depends on extensive temporary road closures and lane restrictions that are still not final The CTMP lists a large number of roads currently under consideration for temporary road closure or lane closure, including Frith Way / Lodge Road, Common Road, Wood Lane, Parker's Lane, Hall Lane, Mill Road, Edge's Lane, Church Lane, Brick Kiln Lane / Devil's Loke, Boylandhall Lane, The Street, Fairstead Lane, Broaden Lane, Bussey's Loke, The Green, Fylands Road, Field Lane, Lundy Green, Spring.... | The Applicant acknowledges that the exact extent and duration of temporary traffic management measures will be refined through detailed design and in consultation with NCC. This is reflected within the outline plans (including the Outline CTMP [APP-201] and Outline Public PRoWPPMP [APP-203]). The locations identified represent roads where temporary traffic management may be required to facilitate access or for cable trenching....                                                                                    | Answered             | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-312 | Construction traffic levels remain substantial and industrial in character The CTMP estimates a peak daily total for the Sites of 69 HGV arrivals plus 69 HGV departures and 205 car/LGV/shuttle arrivals plus 205 departures. It separately estimates peak daily CRC compound traffic of 33 HGV arrivals plus 33 departures, 15 LGV arrivals plus 15 departures, and 30 car/shuttle arrivals plus 30 departures....                                                                                                     | The Applicant notes the comment regarding scale of construction traffic associated with the Scheme. As noted by BEPS, the assessment adopts a reasonable worst-case scenario which assumes that all construction activities across the Scheme will take place simultaneously. In practice, construction activities will be staggered across the programme, as set out in the Outline CTMP [APP- 201]....                                                                                                                             | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-313 | The road condition survey is too limited to provide proper accountability The Applicant includes road condition survey as part of the mitigation package. However, the CTMP also indicates that the survey focus is on the local road network, while major strategic links are not meaningfully included where scheme-attributable HGV effects are said to be difficult to isolate....                                                                                                                                   | As set out in the Outline CTMP [APP- 201], pre and post construction road condition surveys will be undertaken on relevant parts of the Local Road Network, with the scope agreed in consultation with NCC as the Local Highway Authority. Any highway defects reasonably attributable to construction traffic associated with the Scheme would be rectified to the satisfaction of the Local Highway Authority....                                                                                                                  | Answered             | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-314 | Norfolk County Council's own position shows that key highway objections were not resolved NCC's November 2025 targeted consultation response is one of the clearest and strongest documents in the evidence base....                                                                                                                                                                                                                                                                                                     | The Applicant notes the comments regarding NCC's target consultation response. The Applicant has engaged extensively with NCC as the Local Highway Authority throughout the application process and continues to do so. The access strategy presented within the Application has been developed and refined in response to consultation feedback received from NCC....                                                                                                                                                               | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-315 | Hall Lane remains a live objection because NCC rejected it but the later TA still relies on it NCC's November 2025 response expressly states that the highway authority 'will not accept any construction traffic using Hall Lane.' Despite that, the later Transport Assessment still routes CRC Compound 2 via Hall Lane. Table 6.2 gives 'Compound 2: Hall Lane' using access A14, from Ipswich Road eastbound on Hall Lane and south onto A14....                                                                    | The Applicant notes the comments regarding Hall Lane. The Applicant is also aware of the Long Stratton Bypass and this has informed the development of the access strategy and transport assessment. The Applicant confirms that Hall Lane would be used for AIL movements only and would not form a route for general HGV or LGV traffic. As such, vehicle movements on this route would be limited in frequency....                                                                                                                | Answered             | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-316 | AIL routing remains highly problematic and continues to rely on unsuitable local roads and sensitive areas The TA identifies AIL movements for multiple substations, the BESS and CRC compounds. It says the final number of AIL movements will be confirmed later and that the final port of entry remains under consideration between Felixstowe and King's Lynn....                                                                                                                                                   | The Applicant notes the comments regarding AIL routing. Comments regarding Hall Lane are addressed in BEPS-314. AIL movements have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and the Outline CTMP [APP-201], including route assessments and vehicle tracking. AIL movements would be managed by specialist haulage contractors and subject to detailed route planning and traffic management measures prior to movement.... | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-317 | The traffic baseline is internally inconsistent and uses outdated mapping in places The TA's study                                                                                                                                                                                                                                                                                                                                                                                                                       | The Applicant is aware of the opening of the Long Stratton Bypass, and this has informed the preparation                                                                                                                                                                                                                                                                                                                                                                                                                             | Answered             | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but                                                                      | The Applicant gives an issue-specific explanation or factual position. This is a substantive response,                                                                                                                                 | \$2.17 Transport and Access - cross-checked as the                                                                                                       |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                             |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | area expressly includes the Long Stratton Bypass. The CTMP also routes traffic by reference to the Long Stratton Bypass / Parker's Lane roundabout. However, other figure material has used older mapping that omits the bypass....                                                                                                                                                                                                                                                                                                | of the access strategy. As shown in ES Volume 2, Figure 11.1 - Indicative Transport and Access Study Area [APP-094], the bypass is included within the study area....                                                                                                                                                                                                                                                                                                                                                                    |                      |                                             | the underlying evidential or merits dispute is not thereby resolved.                                                          | although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                                                                        | corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                                   |
| BEPS-318 | The traffic survey coverage is selective and appears weakest on the roads where impacts are most acute. The traffic survey location figures show 30 ATC locations and a single MCC location spread across the study area. Survey coverage exists on principal approaches and selected local links, but not every lane that later appears in the CTMP, Streets Plan or PRoW management plan as a closure route, diversion route, managed crossing route or sensitive local access corridor....                                      | As shown in ES Volume 2, Figures 11.2 to 11.8 - Traffic Survey Locations [APP-096], the traffic survey locations cover both the local and major road networks, and have been used within the trip generation and distribution forecasts detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Following the initial 20 ATC surveys commissioned, an additional 10 surveys were commissioned following consultation feedback....                                                                                          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-319 | The PRoW impacts are scheme-wide, not incidental. The effect assessed in the Outline PRoWPPMP identifies 84 PRoWs within or PRoWPPMP abutting the Order Limits, including 71 footpaths, 9 restricted byways and 4 bridleways. The Access and Public Volume 1, Chas and Access Rights of Way Plan maps those routes sheet-by-sheet acknowledged across the whole scheme....                                                                                                                                                         | As shown in ES Volume 2, Figures 11.2 to 11.8 - Traffic Survey Locations [APP-096], the traffic survey locations cover both the local and major road networks, and have been used within the trip generation and distribution forecasts detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Following the initial 20 ATC surveys commissioned, an additional 10 surveys were commissioned following consultation feedback....                                                                                          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-320 | Numerous PRoWs face medium-term closure and many of the Applications are only 'open but managed' regarding PRoW management plan. The PRoW management plan identifies many medium-term construction closures, including Brooke FP6; Great Moulton FP13 and FP14; Hemphall FP2, FP25 and FP28; Long Stratton FP3; An Applcan and FP4; Morningthorpe FP5, FP9 and FP11; Saxlingham PRoW manage Nethergate FP11, FP12, FP13, FP14 and FP27; detailed in Shotesham FP19 and FP22; and Tivetshall St Margaret management FP2 and RB6.... | As shown in ES Volume 2, Figures 11.2 to 11.8 - Traffic Survey Locations [APP-096], the traffic survey locations cover both the local and major road networks, and have been used within the trip generation and distribution forecasts detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Following the initial 20 ATC surveys commissioned, an additional 10 surveys were commissioned following consultation feedback....                                                                                          | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-321 | The proposed diversion routes are often via roads and lanes and are not equivalent mitigation. Table 4.2 of the PRoW management plan shows that many medium-term closures would be diverted via roads and lanes rather than equivalent traffic-free or field-edge alternatives. Brooke FP6 would be diverted via Littlebeck Lane. Hemphall FP25 and FP28 would be diverted via Spring Lane, Lundy Green and Workhouse Lane. Long Stratton FP3 and FP4 would be diverted via Brick Kiln Lane, Church Lane and FPS....               | The Applicant acknowledges that temporary closures of PRoW require diversions, some of which are on local roads. These measures are temporary in nature and for the construction phase. The indicative construction programme set out in the Outline CTMP [APP-201] demonstrates that construction activities will be staggered across the programme and as such PRoW closures and diversions will be temporary and localised to the relevant construction activities....                                                                | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-322 | Promoted route impacts, especially Boudicca Way, remain unresolved. The PRoW management plan identifies direct intersections with both Boudicca Way and Via Beata in CRC4 and suggests that any closure of these sections would be so limited that no diversion would be necessary....                                                                                                                                                                                                                                             | The Applicant notes the comments regarding the potential effects of the Scheme on promoted routes, including Boudicca Way and Via Beata. The potential effects on PRoW have been considered within the Outline PRoWPPMP [APP-203]. Where temporary closures or diversions are required, these have been identified together with the measures proposed to maintain access during the construction period....                                                                                                                             | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-323 | The Applicant's own consultation record shows NCC wanted much more detail than has been provided. Appendix A to the PRoW management plan records NCC's request for 'much more detail around the length of closures', including not just individual routes but complete closures of groups of connected PRoW, and discussions on how impacts would be reduced. It also records NCC's concern about Fairstead Lane and Boudicca Way and the need for trials-team input....                                                           | The Applicant notes the comments regarding the level of detail contained within the Outline PRoWPPMP [APP-203] and the consultation undertaken with NCC. As recorded within the consultation feedback, NCC sought additional information regarding the duration of PRoW closures and the management of impacts on users. The Applicant acknowledges that the Outline PRoWPPMP [APP-203] provides indicative closure durations at this stage....                                                                                          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| BEPS-324 | The access baseline itself still appears unsettled and internally inconsistent. The PRoW management meeting notes refer to 88 PRoVs having been identified within the scheme, whereas the submitted outline plan says 84. While not decisive on its own, this inconsistency adds to the impression of an access case still evolving. A similar inconsistency appears in the wider transport material....                                                                                                                           | The Applicant notes the comments regarding the number of PRoW identified within the application documents. The PRoW management meeting referred to in the representation took place on 3 October 2025, whereas the Outline PRoWPPMP [APP-203] was submitted with the application on 5 March 2026. During this period, the Scheme continued to evolve through ongoing design development and consultation. The purpose of the meeting was to inform the ongoing development of the Scheme and seek feedback on the emerging proposals.... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit classification | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                             |
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| BEPS-325 | The scheme includes a second major traffic phase during operation The Outline OTMP confirms that the operational phase is not limited to occasional maintenance visits. It assumes one full solar panel replacement during the scheme life, likely after about 40 years, lasting up to 24 months. It also states that the BESS could be replaced up to five times during the operational phase and that transformers may require replacement once....            | The Applicant notes the comments regarding replacement activities during the operational phase. The Applicant does not agree that replacement activities represent a second construction phase. Replacement activities would primarily comprise the replacement of existing infrastructure rather than the construction of the Scheme from the outset. Please refer to Section 3.2 of the Outline OTMP [APP-202] for a description of the replacement activities anticipated to occur....                                                     | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-326 | Operational and replacement routing and mitigation are The Appl also deferred comments The OTMP is even more deferential than the CTMP. It says contained with the detailed OTMP will be a live document updated before [APP-202 scheduled replacement activities, to reflect changes in activity vehicle routes and the wider local road network....                                                                                                            | licant acknowledges the regarding the level of detail in the Outline OTMP ] in relation to replacement es. ed OTMP will be developed er stage. As set out in h 4.1.1 of the Outline OTMP ], solar PV panel ent is anticipated to be an nt activity, the programmed ent of all panels has been as occurring only once 60-year operational lifespan scheme, approximately 40 years mmencement of operation. e long timescales involved, it is not currently possible to accurately predict the future baseline conditions that would influen... | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-327 | Replacement and operational impacts on PRoWs are also built into the scheme The OTMP simply imports the PRoW management measures from the construction phase for replacement activities, including signage, yielding, marshals, 5–10 mph speed limits and keeping routes clear only so far as practicable. The PRoW plan likewise states that the effects on PRoWs and permissive paths during replacement will be managed in the same way as construction....   | The Applicant notes the comments regarding the potential effects of replacement activities on PRoWs. The Applicant does not agree that such effects would be present throughout the operational life of the Scheme. The measures referred to within the Outline OTMP [APP-202] and the Outline PRoWPPMP [APP-203] would only apply during periods when replacement activities are taking place....                                                                                                                                            | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-328 | New permissive paths do not offset the permanent and temporary harms to the established public network The PRoW management plan proposes three new permissive paths, in Sub-Sites 7F, 8B and 10B. While these may provide some local benefit, they are not equivalent to definitive PRoWs. They are permissive rather than permanent public rights, tied to the scheme's operational life, and the same document confirms they will cease at decommissioning.... | No permanent closures of PRoW are proposed as part of the Scheme, and any PRoW temporarily affected during construction would be reopened following completion of the relevant works. The permissive paths proposed provide an additional benefit during the operational phase of the Scheme and are supplementary to the existing PRoW network. They are not relied upon as mitigation for any permanent loss of PRoW access....                                                                                                             | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-329 | The scheme affects routes near sensitive community receptors, including schools and settled lanes The Access and Public Rights of Way Plan shows several affected rights of way and road-based diversion areas close to settlements and community facilities....                                                                                                                                                                                                 | The Applicant notes the comments regarding the interaction between the Scheme and sensitive receptors. Sensitive receptors are identified in ES Volume 1, Chapter 11 - Transport and Access [APP-047] and are included within the assessment in alignment with IEMA Guidelines. The Applicant recognises that some PRoW in the vicinity of settlements and community facilities may be y affected during on....                                                                                                                               | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-330 | The cumulative assessment remains narrow and unconvincing The TA considers a small group of cumulative schemes and concludes that cumulative impacts do not exceed IEMA thresholds on the major corridors considered. But this remains a corridor-based and percentage-based exercise....                                                                                                                                                                        | The cumulative assessment presented within ES Volume 1, Chapter 11 - Transport and Access [APP-047] considered the effects of the Scheme alongside other relevant developments in accordance with the agreed assessment methodology. Cumulative schemes with respect to traffic and transport (which were not already inherent within TEMPro in the future baseline calculations) were also agreed with NCC as the Local Highway Authority....                                                                                                | Answered             | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |

**Table A7: BEPS entries BEPS-331 to BEPS-385**

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                             |
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| <b>BEPS-331</b> | The Applicant's conclusion of no significant transport impact is not borne out by its own evidence. The TA concludes that the scheme is acceptable from a transport and access perspective and that impacts are not significant....                                                                                                                                                                                                                                         | Whilst the assessment in ES Volume 1, Chapter 11 - Transport and Access [APP-047] identifies links that exceeded initial IEMA (now ISEP, however the guidance remains referred to as the 'IEMA guidance') thresholds, these were subject to further detailed assessment in accordance with IEMA Guidelines. This assessment concluded that there would be no significant adverse effects in relation to severance, delay, amenity, fear, safety and hazardous and large loads....                                           | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                        |
| <b>BEPS-332</b> | Conclusion Taken together, the CTMP, OTMP, PRoW and Permissive Paths Management Plan, and the Access and Public Rights of Way Plan do not demonstrate a safe, fixed and fully assessed transport and access solution. They reveal a scheme that depends on extensive access engineering, numerous crossings, widespread temporary closures, managed conflict on paths, road-based diversions, provisional abnormal-load works, and significant post- consent refinement.... | The Applicant notes this comment and refers to its response to BEPS-307 to 331.                                                                                                                                                                                                                                                                                                                                                                                                                                             | Ignored / noted only | No material new information                 | No. The point is not substantively engaged with.                                                                              | The response contains no issue-specific reasoning or evidence; it merely notes, disagrees with, or refers elsewhere to the point.                                                                                     | \$2.16 Recreation and Public Rights of Way - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-333</b> | The Examining Authority and Secretary of State are requested to require, at minimum, the following. The Applicant should be required to: • provide a fully revised and internally consistent Transport and Access case, using an up-to-date post- bypass baseline and mapping throughout, and correcting any inconsistent or outdated figures....                                                                                                                           | The Applicant considers that sufficient information has been provided to demonstrate a safe and deliverable transport and access strategy. Traffic survey data used within the assessment is robust and representative of local network conditions. The Applicant is aware of the opening of the Long Stratton Bypass and has engaged with Norfolk County Council (NCC) throughout the development of the access strategy. The Applicant continues to work collaboratively with NCC on transport matters....                | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                        |
| <b>BEPS-334</b> | BEPS objects to the Proposed Development on the grounds that it gives rise to serious and inadequately assessed aviation safety impacts, particularly in relation to Tibenham Airfield and Seething Aerodrome. Those impacts are not addressed in a coherent or lawful way in the Environmental Statement....                                                                                                                                                               | The Applicant has assessed impacts specifically for Norfolk Gliding Club at ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029] turbulence and thermal effects and emergency landing constraints High Level Investigative Report [APP-222]. The assessments have been undertaken in accordance with the relevant guidance and policy, industry best practices, and assessment methodology for previously consented NSIP and DCOs....                                                               | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| <b>BEPS-335</b> | Tibenham Airfield is a highly sensitive and nationally significant aviation receptor. Tibenham is not a casual strip or low-value receptor. The Applicant's own Tibenham report describes it as an unlicensed aerodrome used by Norfolk Gliding Club (NGC) and powered light aircraft, with three runways and adjacent grass strips also used. The closest panels in Sites 1A and 1B are said to lie only 1.59km from the nearest runway threshold....                      | The Applicant considers that Tibenham Airfield is not a nationally significant receptor, as an unlicensed aerodrome does not accommodate for national aviation infrastructure. The Applicant acknowledges that Tibenham Airfield have previously hosted competitions on a 'national' scale, but does not relate to the significance of Highly Sensitive as defined in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]....                                                                                   | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                        |
| <b>BEPS-336</b> | Policy and safeguarding context The Applicant BGA material confirms that Tibenham is an aerodrome upon Tibenham A relevant p for planning and aviation purposes, notwithstanding its legislative unlicensed status, and points to CAP793, the ANO 1, Chapter definition of an aerodrome, and national policy support for general aviation airfields, including unlicensed aerodromes....                                                                                    | ant has considered impacts irfield considering the olicy, guidance and n outlined in the ES Volume 18 – Other Environmental PP-054]. The Applicant has th Tibenham Airfield and pefic circuits and pertaining to the engine-d gliding activity. The ged to not cause a t adverse scenario, due to panels being behind a pilot travelling in the direction of a circuit, or views of reflecting panels coinciding with the sun, outlined in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029].... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                            |
| <b>BEPS-337</b> | Failure to treat aviation as a coherent safety receptor The Appl The aviation effects are split across multiple documents. upon Tib Glint and glare is dealt with in the glint and glare appendix. Volume 3 Glare As Artificial lighting is dealt with in the Lighting Strategy. 029], gl Tibenham is dealt with in a separate 'High-Level specific Investigative Report'. Seething is dealt with in another report on forced landing options....                           | icant has assessed impacts enham Airfield via the ES , Appendix 18.1 – Glint and sessment [AS-025] to [AS- int and glare addendum to Tibenham Airfield, and l aviation concerns (High vestigative Report [APP- he assessments have been en in accordance with the uidence, industry best s and assessment ogy for previously accepted DCOs....                                                                                                                                                                              | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| <b>BEPS-338</b> | Glint and glare assessment is unreliable and operator evidence has been ignored NGC's July 2025 objection to the glint and glare work is detailed and serious. It says the glint and glare report is based on errors, inaccuracies and omissions, that Pager Power did not have a proper aviation understanding, and that the report continued to rely on simplistic power-only circuit modelling despite NGC having explained the complexities of mixed                    | The Applicant had engaged with Norfolk Gliding Club to establish receptors, including technical details, to inform the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029]. The requests are documented via email chain. Norfolk Gliding Club were able to confirm the receptors once they had understood what was being asked of them....                                                                                                                                                         | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                  |
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|          | glider and powered aircraft operations and shown actual cir...                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                               |                      |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                        |
| BEPS-339 | Tibenhams report: high-level, assumption-led, and not precautionary The Tibenhams report is expressly titled a "High-Level Investigative Report". Its purpose is to investigate EFATO and glider launch failure, thermal updrafts and turbulence / wind shear in relation to Norfolk Gliding Club at Tibenhams. Pager Power told the Safeguarding Officer at Tibenhams that this report had actually been based on work done at an engine-powered airfield in Yorkshire the previous year....        | The Applicant had informed Norfolk Gliding Club that their concerns had been similarly raised by other aerodromes and referenced the Yorkshire airfield as an example to reiterate and demonstrate that their concerns can be addressed. The subsequent assessment High Level Investigative Report [APP-222] is specific to Norfolk Gliding Club, and refers to applicable guidance, conservative assumptions and industry best practices.... | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-340 | EFATO, glider launch failure and aborted aerotow risks at Tibenhams NGC's evidence on launch failure is detailed and highly relevant. It points out that engine failure after take-off is not the only relevant event. In gliding terms, aborted aerotow events may arise from tug issues, glider issues, tow rope issues, bird strike, crosswind and turbulence effects, speed and weight issues, and meteorological factors....                                                                    | The Applicant has considered EFATO and Glider Launch Failure in accordance with the applicable guidance and industry best practices in the High Level Investigative Report [APP-222]. The Applicant notes that further information regarding thresholds to determine the impact was not provided by Tibenhams Airfield.                                                                                                                       | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-341 | Bird strike is not assessed as part of the aviation case NGC says bird strike is one of the four main aviation safety risks created by a solar installation of this size close to an active airfield and refers to concerns that solar panels may attract birds through a 'lake effect'. NGC explains that a bird strike can cause anything from severe cockpit contamination to engine failure, and that in a light aircraft the time available to respond may be extremely short....               | It is considered likely that the Scheme will result in increased opportunity for nesting bird species; primarily, this will benefit passerine species associated with agricultural habitats (for example, yellowhammer <i>Emberiza citrinella</i> ) which pose no significant risk regarding bird strike....                                                                                                                                  | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-342 | Seething report: express admission of aviation constraint and reactive redesign The Seething Aerodrome report is especially revealing because it expressly accepts that the earlier design constrained forced landing options. It states that Site 10 lies under the climb-out from runway 24 at Seething and that the eastern section of Site 10 occupies land extending along the extended centreline from about 500m to 2,100m from the runway end....                                            | The potential for the Scheme to affect forced landing options for aircraft using Seething airfield has been assessed in Potential Impact on Seething Aerodrome Force Landing Options [APP-223]. Following the conclusions of this report the layout was changed in order to provide additional safe landing areas for aircraft operating to/from Seething airfield.                                                                           | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-343 | Operator evidence is entitled to substantial weight NGC states that the close proximity of the proposed solar farm poses an unacceptable safety risk to its operations and relies on CAA and safeguarding principles to say that the aerodrome operator is the body best placed to determine what is and is not safe for that aerodrome. The BGA supports NGC and says any further plans should rigorously investigate Sites 1 and 2 in respect of glint and glare and engine or launch failures.... | The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best practice; and no significant impact effect on thermal updrafts, turbulence or wind shear was predicted as outlined in the High Level Investigative Report [APP-222]. The Applicant will continue to engage with NGC to discuss potential launch failure issues and potential mitigations.                                              | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-344 | Cumulative effects: no lawful cumulative aviation assessment The cumulative schemes appendix confirms a dense cluster of energy and transport infrastructure in South Norfolk and includes Norwich to Tilbury, EcoPower Suffolk, High Grove Solar, The Drovers, Hornsea Project Three, Sheringham and Dudgeon extensions, local BESS schemes and other developments. The cumulative developments map visually confirms that concentration....                                                        | The Applicant considers assessment of a combined 'obstacle environment' as not significant for a Scheme proposing solar panels no more than 4.5m above ground. Cumulative glint and glare impacts had been considered by the Applicant, and ruled out due to the different configurations of solar panels for the developments considered. As a result, solar reflections from the Scheme do not coincide with other developments.            | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-345 | Scheme lighting, glint and cumulative obstacle environment are not assessed together The Scheme's aviation impacts do not arise from one mechanism only. They arise from a combination of reflective surfaces, panel tilt and tracking, emergency landing constraint, artificial lighting, substations, possible turbulence / thermals, increased pilot workload, training effects, competition effects and possible cumulative obstacle and routing effects with other infrastructure....           | The scope of topics to be assessed within the ES were agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]). The Applicant considers that the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS- 029] provides a comprehensive and proportionate assessment of the aviation-related effects of the Scheme....                                                            | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.11 Lighting - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-346 | Consequences for Tibenhams's utility, training, competition role and viability The BGA says anything which reduces launch rate or makes launch direction unusable threatens the club's survival. It explains that Tibenhams is important for basic training, cross-country flying and national competitions, and that not being able to aerotow in one direction would undermine both ordinary club activity and competition utility....                                                             | The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best practice and no significant impact effect on thermal updrafts, turbulence or wind shear was predicted as outlined in the High Level Investigative Report [APP-222]. The Applicant will continue to engage with NGC to discuss potential launch failure issues and potential mitigations.                                               | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                             |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-347 | Summary of the objection The aviation evidence before the Examining Authority already shows the following: • Tibenham is an active, nationally significant gliding and aviation site, with real mixed-use operational complexity, not a simple or low-sensitivity receptor. • the operator, BGA and GAAC have all raised sustained objections or concerns. • the Applicant's glint and glare and aviation analysis has been criticised by those who actually understand and operate the site....                       | The Applicant refers to its response to BEPS-334 to 348.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-348 | Remedies sought BEPS therefore asks the Examining Authority to treat aviation safety, airfield safeguarding and cumulative aviation effects as principal issues for examination. BEPS seeks: a full and integrated aviation assessment covering glint and glare, artificial lighting, EFATO, glider launch failure / aborted aerotow, thermal and turbulence effects, bird strike and pilot workload; proper cumulative assessment with Norwich to Tilbury and other relevant solar / BESS schemes; full disclosure... | The Applicant has used and assessed, including geometric modelling for, specific receptors as outlined by Norfolk Gliding Club for the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS- 029] and additional concerns such as EFATO, glider launch failure / aborted aerotow, thermal and turbulence effects [APP-222]. The Applicant considers the conclusions of these assessments in accordance with relevant guidance and industry best practice as robust....                                    | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-349 | Chapter 12 - Noise and Vibration Overview BEPS objects to the Scheme because the applicant has not demonstrated that likely noise and vibration effects would be acceptable for nearby residents, sensitive community receptors, public rights of way users, equestrians, or sensitive ecological receptors....                                                                                                                                                                                                        | The sound environment has been considered at each receptor within the assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], with measurements undertaken at representative locations. The measurements conducted at each location have been analysed, and typical background sound levels have been derived for each noise residential receptor. Receptor-specific scrutiny has therefore been applied, based on the methodology provided within BS 4142....                                      | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-350 | The assessment is too dependent on assumed mitigation. The follow included i Appendix 12.2 confirms that the operational assessment depends on a series of assumptions and controls, including 197]: example manufacturer data, assumed plant orientation, • Noise fr assumed acoustic fencing around selected BESS areas, the pr reduced fan speed duty at night and in the early morning, and further 'additional mitigation' to reduce inverter sound levels in the early morning period....                        | ing commitments are n the Outline OEMP [APP- om the BESS will achieve edicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on PROWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.                                                     | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-351 | The baseline confirms a very quiet rural sound environment. The assessme Volume 1, Ch The baseline sound survey shows that many parts of the Vibration [A Scheme lie in genuinely quiet rural environments, variability particularly at night and in the early morning. The survey covered 51 measurement locations over 6 to 8 day periods around the Sch relevant ass between November 2024 and February 2025....                                                                                                    | nt presented in ES apter 12 – Noise and PP-048] considers the of background sound levels eme by following the essment methodologies. nt methodologies rely on background and ambient at receptors. 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....     | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-352 | The receptor pattern requires a more local and granular assessment Figure 12.2 is important because it shows the spread and number of noise-sensitive receptors across the whole Scheme. Receptors are not confined to one cluster; they are distributed around multiple site parcels and route sections, including locations that are evidently close to infrastructure areas, cable route sections and rural lanes....                                                                                               | The assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] is based on guidance provided within BS 4142:2014+A1:2019. The NOAEL, LOAEL and SOAEL thresholds applied within the assessment are based on the guidance set out within BS 5228-1 and BS 4142, and take account of varying ambient and background sound levels across the Scheme. The assessment has been undertaken at each individual receptor, with the results presented in ES Volume 3, Noise Modelling and Calculations [APP-179]. | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-353 | The BS 4142 operational case is open to challenge. The acoust with justl The operational assessment uses BS 4142 methodology, but Appendix 12.2 confirms that the applicant has applied a Table 3.16 12.2 – Noi 0 dB correction for tonality, impulsivity, intermittency and other sound characteristics....                                                                                                                                                                                                           | ic feature corrections, along fictions, are provided in ES Volume 3, Appendix se Modelling and [APP-179]. f impulsivity, the proposed runs continuously without sudden, noticeable sounds. eature corrections for y are therefore not applied. In terms of intermittency, during the battery charging and discharging process, inverters, transformers and battery cooling systems operate continuously, surpassing the BS 4142 reference time interval (1 hour during the day and 15 minutes at night)....                  | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-354 | The applicant's own modelling produces adverse operational outcomes before additional mitigation. The applicant's own early-morning operational assessment shows adverse outcomes before additional mitigation is applied. Table 3.18 in Appendix 12.2 records minor adverse and moderate adverse effects at a range of receptors where                                                                                                                                                                                | 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                                                                                                                                              | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                              |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
|          | calculated rating levels exceed background sound levels by up to +8 dB....                                                                                                                                                                                                                                                                                                                                                                                                                                     | commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised....                                                                                                                                                                                                                                                                                                                                                                                              |                      |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                    |
| BEPS-355 | South Norfolk Council directly disputes the operational thresholds and acceptability case South Norfolk Council's Environmental Management Officer raised strong and specific concerns in relation to Chapter 12. SNC stated that operational noise should be at background level or below, that 5 dB above background is considered LOAEL and is not acceptable, and that the BESS and substation details were insufficiently fixed to support the conclusions being drawn....                                | The adopted LOAEL threshold is consistent with that referenced by The Interested Party, being 5 dB above the background sound level for operational noise. Noise policy (NPS EN-1.3 and 5) requires that: • Significant adverse effects are avoided (i.e. those which exceed the SOAEL); and • Adverse effects are mitigated and minimised (i.e. those which are above the LOAEL). In this case, the operational noise commitments within the Outline OEMP [APP-197] comply with this....                                          | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.  |
| BEPS-356 | Construction noise has been understated The construction case is more serious than the headline chapter suggests. Appendix 12.2 states that access road works would exceed the daytime SOAEL when within 30 m of high sensitivity receptors. It also identifies moderate adverse piling effects at NSR29 and moderate adverse daytime HDD effects at NSR45. The night-time HDD case is stronger still....                                                                                                      | The Applicant acknowledges that the SOAEL is expected to be exceeded when internal access roads are within 30 m of high sensitivity receptors. To reduce impacts, mitigation will be incorporated, such as consideration of the location of internal access routes and localised temporary barriers during construction. The use of acoustic barriers to minimise noise impacts is noted in the Outline CEMP [APP-196]....                                                                                                         | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-357 | The treatment of duration and significance The applicant records that HDD works may produce very high temporary impacts, including night-time effects above SOAEL, but then seeks to reduce their importance by relying on the fact that the works are temporary and move around the site. That is not an adequate answer for the residents who are actually exposed, particularly where exposure occurs overnight or in the early morning in very quiet locations....                                         | The Applicant has determined that resultant construction noise levels from any night-time HDD works could be above the SOAEL. The assessment considers that the effects are not significant due to the duration of exposure. This is based on guidance provided within BS 5228- 1:2009+A1:2014. The Applicant acknowledges that the SOAEL could be exceeded due to any night-time HDD works at specific receptors. However, mitigation will be employed to mitigate noise effects as far as practicable....                        | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-358 | Quieter practicable construction methods have not been demonstrated The applicant has modelled percussive piling and other significant vibration-generating methods as part of the construction case. Appendix 12.2 confirms vibration calculations for percussive piling and identifies worst affected receptors including NSR29 at 45 m and NSR8 at 90 m. South Norfolk Council expressly objected to percussive piling and stated that quieter alternatives such as screw piles should be preferred....     | As noted in paragraph 4.3.7 of ES Volume 1: Chapter 4 – The Scheme [APP-040], driven piles are the most common installation solution on existing UK solar farms. The construction noise assessment results presented in Table 12-18 of ES Volume 1 Chapter 12 – Noise and Vibration [APP-048] outlines that two noise sensitive receptors (NSR29, commercial facilities on Bungay Road) and NSR 8 (residential) are expected to experience temporary short-term effects....                                                        | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-359 | Vibration effects are not convincingly resolved The vibration assessment adopts conservative assumptions and concludes that effects would be minor adverse or negligible. However, that conclusion is tied to the same issue as above: whether the applicant should be using percussive piling at all. If a quieter method is practicable, then vibration from a noisier method should not be treated as an acceptable baseline merely because the calculated PPV falls within a 'minor' category....          | As noted in paragraph 4.3.7 of ES Volume 1, Chapter 4 – The Scheme [APP-040], driven piles are the most common installation solution on existing UK solar farms. The construction vibration assessment results presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] outlines that one noise sensitive receptor (NSR29, commercial facilities on Bungay Road) is approximately 45 m from potential piling works, which would result in vibration levels approaching but not exceeding the SOAEL.... | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.  |
| BEPS-360 | Sensitive receptors have not been treated with enough caution South Norfolk Council challenged the applicant's receptor sensitivity approach, including the treatment of the nursery receptors at Site 5. SNC stated that the nursery occupants should be treated as high sensitivity, not medium, and also required outdoor amenity space to be assessed, especially during evenings and weekends when residents are more likely to be outdoors and scheme-related equipment may still be operating....       | The assessment presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] applies a high sensitivity to NSR30 (Jack in the Box Nursery). The assessment of operational noise considers sound levels experienced outside of noise sensitive properties. The assessment therefore considers a worst case based on receptor being outside at NSR30.                                                                                                                                                                     | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.         |
| BEPS-361 | Rights of way users and equestrians are underassessed The British Horse Society stated that inverter housing should avoid sound transmission and be sited away from bridleways and byways, and that construction traffic should avoid passing along or across equestrian routes where possible. Those concerns are directly relevant in a rural area where bridleways, byways and green lanes are part of the daily access network and where user amenity depends on a sense of openness, quiet and safety.... | The Interested Party is referring to the Advice on Solar farms new routes used by equestrians published by the British Horse Society in August 2025. The guidance states that "Inverter buildings near rights of way should be constructed to minimise transfer of sound". No definition is given to how 'near' inverter buildings need to be for the advice to be relevant, or by how much noise should be minimised....                                                                                                          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-362 | Health, amenity and mental wellbeing are inadequately addressed Norfolk County Council Public Health stated that the ES should contain a dedicated assessment of mental health and wellbeing impacts, including in-combination effects                                                                                                                                                                                                                                                                         | The assessment of noise presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] is founded on NOAELs, LOAELs and SOAELs, which are described in Table 12-4. Levels which are below the LOAEL are defined as: "Noise can be heard, but does not cause any                                                                                                                                                                                                                                                              | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.22 Noise and Vibration - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.  |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Audit classification        | New information?                     | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                  |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | and specific consideration of vulnerable populations....                                                                                                                                                                                                                                                                                                                                                                                                                                                                | change in behaviour, attitude, or other physiological response....                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                             |                                      |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                        |
| BEPS-363 | The Statutory Nuisance Statement does not cure the defects The Statutory Nuisance Statement simply adopts the applicant's position that no significant noise or vibration effects are anticipated and then says the Scheme would not give rise to statutory nuisance. It relies on Chapter 12 and the associated management plans, and refers to a defence within the Draft DCO in relation to noise nuisance proceedings. That document does not overcome the substantive problems in the Chapter 12 evidence base.... | The Applicant has prepared a Statutory Nuisance Statement [APP- 208]. This draws upon the assessment conclusions from Environmental Statement and concludes that the construction, operation and maintenance, and decommissioning of the Scheme would not give rise to any impacts that would constitute a statutory nuisance under Section 79(1) of the Environmental Protection Act 1990....                                                                                                                                      | Answered                    | Some - fuller explanation or data    | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-364 | Ecological noise effects, especially on barbastelles, have not been properly assessed Chapter 12 is framed primarily as a human-receptor assessment. Ecological effects are cross-referred elsewhere, and operational ecological noise was largely scoped out. The Statutory Nuisance Statement confirms the same structure by treating noise as a matter of human health and amenity and containing no substantive bat or ecological noise assessment in its noise section....                                         | An assessment of potential noise impacts to roosting bats during construction, operation, and decommissioning is set out within Sections 8.9.580-8.9.602 of Chapter 8 - Ecology and Biodiversity [APP- 044]. An assessment of potential noise impacts to commuting and foraging bats during construction, operation, and decommissioning is set out within Sections 8.9.603 to 8.9.629 of ES Volume 1, Chapter 8 Ecology and Biodiversity [APP-044]....                                                                             | Answered                    | Some - fuller explanation or data    | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-365 | The cumulative noise case is not reliable The applicant concludes that cumulative operational noise effects would be minor adverse and not significant, but South Norfolk Council directly disputed that conclusion on the basis that the BESS and substation noise impacts had not themselves been properly resolved. A cumulative conclusion is only as reliable as the individual component assessments....                                                                                                          | ES Volume 1, Chapter 12 – Noise and Vibration [APP- 048] includes a comprehensive assessment of cumulative noise. The following commitments are included in the Outline OEMP [APP- 197]: • Noise from the BESS will achieve the predicted sound levels in Chapter 12 of the ES (ES Volume 1, Chapter 12 – Noise and Vibration [APP- 048]). • The rating level from other elements including substations of the Scheme will not exceed the background sound level at other residential receptors....                                 | Deflected / cross-reference | No material new information          | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-366 | Conclusion Taken together, the applicant's own material shows that the noise and vibration assessment is more fragile than the headline 'not significant' conclusion suggests. The baseline confirms very quiet rural receptor environments. The modelling shows adverse early-morning operational outcomes before additional mitigation is assumed....                                                                                                                                                                 | The Applicant refers to its response to BEPS-348 to BEPS-364.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information          | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-367 | Remedies sought BEPS requests that the Examining Authority give little weight to the applicant's present conclusion that noise and vibration effects are acceptable unless and until the applicant provides: a fuller receptor-specific reassessment of construction and operational effects; a stricter and clearly justified BS 4142 assessment including proper consideration of tonal and other acoustic features; a reassessment of early-morning and low-background rural impacts without reliance on vague fu... | The Applicant refers to its response to BEPS-348 to BEPS-364.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deflected / cross-reference | No material new information          | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-368 | Chapter 13 – Air Quality Introduction The Applicant's air quality case does not provide a robust, spatially representative or fully assessed account of the likely air-quality effects of this unusually dispersed, multi-site solar, cable, substation and BESS NSIP....                                                                                                                                                                                                                                               | The Applicant refers to its response to BEPS-370.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information          | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-369 | Unrepresentative baseline and inappropriate reliance on Long Stratton roadside monitoring The baseline relied upon is not representative of the receiving environment across the Order Limits. Chapter 13 states that there is 'sufficient baseline data' and therefore no scheme-specific air quality monitoring was undertaken....                                                                                                                                                                                    | The Applicant considers that monitoring data from monitoring sites adjacent to the A140 in Long Stratton provide a worst-case baseline position for the study area. The methodology for defining air quality impacts is set out in Table 13.6 of ES Volume 1, Chapter 13 – Air Quality [APP-049], in accordance with Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) best practice guidance....                                                                                                   | Answered                    | Some - fuller explanation or data    | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.18 Air Quality - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-370 | Generic screening criteria have been used as a substitute for a proper receptor-specific baseline Appendix 13.2 shows that the Applicant relies on generic EPUK/IAQM screening criteria as the gateway for deciding whether to proceed to detailed air-quality assessment....                                                                                                                                                                                                                                           | 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 r 13 – Air Quality [APP- determine whether a detailed t of air quality impacts is The EPUK & IAQM criteria utonary and are intended to prompt for initiating a led assessment where there ibility of a significant effect .... | Deflected / cross-reference | No material new information          | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| BEPS-371 | The chapter is structurally too narrow and scopes out material air-quality pathways Chapter 13                                                                                                                                                                                                                                                                                                                                                                                                                          | The scope of the ES Volume 1, Chapter 13 – Air Quality [APP-049] has been refined through the EIA Scoping                                                                                                                                                                                                                                                                                                                                                                                                                           | Answered                    | Yes - factual clarification / future | No. It provides clarification but confirms that material                                                                      | The response gives a substantive explanation, but it also confirms reliance on later design,                                                                                                                          | \$2.7 Construction and Decommissioning - cross-checked                                                                                                 |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | expressly states that the Scheme has the potential to affect air quality during construction, operation and decommissioning by five main routes: road traffic emissions, fugitive dust, NRMM emissions, emergency back-up generator emissions, and BESS fire event emissions. Yet the chapter then removes most of those pathways from substantive ES assessment....                                                                                               | and consultation process. The assessment presented in Chapter 13 therefore focusses on potential likely significant air quality effects as agreed through EIA Scoping. Whilst scoped out of the ES, dust emissions during construction, operation and decommissioning are assessed in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180]....                                                                                                                                                      |                             | work confirmed                    | work remains to be done later.                                                                                                | investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established.                                                                             | as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                        |
| BEPS-372 | Over-reliance on deferred control documents rather than assessment within the ES The chapter repeatedly relies on outline plans and future mitigation rather than fully assessed and secured evidence at the point of examination. Dust is left to the dust risk assessment and outline CEMP, OEMP and DEMP. NRMM emissions are scoped out on the basis of future compliance measures....                                                                          | The Applicant refers to its response to BEPS-371. ES Volume 1, Chapter 13 – Air Quality [APP-049] assesses the potential likely air quality effects of the Scheme in accordance with the methodology and effects agreed through EIA Scoping and consultation. A worst-case assessment has been undertaken at outline stage based on the information available at the time of assessment....                                                                                                                                                 | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.18 Air Quality - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                     |
| BEPS-373 | Emergency diesel generator emissions are inadequately addressed The chapter confirms that, where local grid connections are not possible, the National Grid substation will be equipped with a back-up diesel generator up to 500 kVA. It says the specification has not yet been defined, that operation would be infrequent, and that mitigation such as appropriate stack height and SCR is available....                                                       | The Applicant refers to its response to BEPS-371. The specification of any proposed generators has not yet been defined. However, as agreed with the local authorities through the EIA Scoping exercise, the potential air quality effects of back-up generator emissions are considered to be not significant in EIA terms. An assessment of generator emissions will be undertaken pursuant to an OEMP requirement once the specification of the generators has been finalised....                                                        | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.4 Energy Need and Grid Connection - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.  |
| BEPS-374 | Operational air-quality effects are understated, especially over a 60-year project life The chapter's treatment of operational air quality is too dismissive for a project with an operational life of up to 60 years....                                                                                                                                                                                                                                          | Operational road traffic information, including the nature of maintenance traffic, frequency and estimated movements during both maintenance and replacement activities are set out in the Outline OTMP [APP-202]. total peak daily vehicle movements S Volume 1, Chapter 13 [APP-049], are greater icted vehicle movements maintenance and ctivities during the hase....                                                                                                                                                                   | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.18 Air Quality - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                     |
| BEPS-375 | Decommissioning assessment remains too limited relative to PINS' scoping direction The Scoping Opinion expressly refused to allow decommissioning air-quality effects to be scoped out and required the ES to include an assessment of dust emissions and road traffic emissions during decommissioning where significant effects are likely, or assessmen otherwise to justify why they are not....                                                               | An assessment of fugitive dust emissions during decommissioning is presented in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]. The t presented in Appendix ides justification that the air resulting from emissions uring the decommissioning I not be significant in EIA lowing implementation of dust measures from best practice produced by the IAQM. As essment is not required e ES. Mitigation measures to ust emissions during the ioning phase are set out in ne DEMP [APP-198].... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-376 | The chapter does not satisfactorily address PM2.5 minimisation in a vulnerable rural community and ecology context PINS specifically drew attention to DEFRA's PM2.5 interim planning guidance and said the ES should explain how key sources of air pollution had been identified and how action had been taken to minimise emissions of PM2.5 or its precursors....                                                                                              | The assessment presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] has been carried out in accordance with the methodology agreed through EIA Scoping and consultation. The assessment considers PM2.5 in relation to compliance with national air quality objectives and targets as set out in relevant legislation and national policy....                                                                                                                                                                                       | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-377 | Cumulative air-quality effects require closer scrutiny The project has consistently raised wider concerns about cumulative impacts with other energy, infrastructure and development schemes. The Applicant's original scoping position had been that significant cumulative air-quality effects were unlikely because of low traffic flows and the absence of nearby committed developments within 250 metres, though that was to be reviewed at ES stage....     | The effects of dust emissions resulting from the Scheme are mitigated through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Detailed versions of these management plans are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032]. The mitigation secured through these management plans is sufficient to ensure that effects resulting from dust emissions will not be 'significant', including when considered cumulatively with other developments....                                        | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-378 | The study area and traffic data limitations reinforce the risk of underassessment Chapter 13 says that for construction road-traffic assessment the EPUK/IAQM screening criteria were applied only to roads for which traffic data had been provided. That creates an obvious dependency on the transport study area and selected links. If routes evolve, intensify, or omit sensitive rural links, the air-quality assessment will inherit those limitations.... | The construction traffic routing which has informed the assessment of construction traffic emissions presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] is controlled through the Outline CTMP [APP-201]....                                                                                                                                                                                                                                                                                                                      | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-379 | The overall conclusion of no significant effects is not robustly demonstrated Taken together, the chapter's methodology is not robust enough to support a confident conclusion of no significant air-quality effects across the project as a whole. The baseline is skewed to the main traffic hotspot. Generic screening criteria are used as a principal filtering                                                                                               | The Applicant refers to its response to BEPS-367- 377.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.18 Air Quality - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                     |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                    |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | tool. Dust, NRM, combustion plant and BESS fire emissions are largely pushed outside the substantive chapter....                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                             |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                          |
| BEPS-380 | Remedies sought The Examining Authority is requested to require the Applicant to provide supplementary environmental information which: <ul style="list-style-type: none"> <li>• establishes a genuinely representative baseline across the rural Order Limits rather than relying predominantly on Long Stratton roadside monitoring;</li> <li>• reassesses road-traffic, particulate and dust effects using receptor-specific analysis for rural villages, lanes, PRoW and ecological receptors;</li> <li>• provides a full and examination-ready assessment of emergency g...</li> </ul> | The Applicant refers to its response to BEPS-367- 377.                                                                                                                                                                                                                                                                                                                                                                                                                                              | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-381 | Chapter 14 – Socio-Economics Overview BEPS objects to the Applicant's socio-economic case for East Pye Solar on the basis that Chapter 14 is structurally too narrow, overly generic, fragmented across multiple application documents, and insufficiently rooted in the realities of the host communities most affected by the Scheme....                                                                                                                                                                                                                                                  | The Applicant has considered SCC's Supplementary Guidance Document for Socio-Economic Effects (document dated January 2025), and this has informed the preparation of ES Volume 1, Chapter 14 – Socio-Economics [APP-050], for instance with respect to the effects included in the analysis. We acknowledge that socio-economic considerations do overlap with other technical topics, but these are covered in other ES chapters, detailed in the following response.                             | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-382 | Artificially Narrow Scope of Assessment Chapter 14 expressly limits the socio-economic assessment to jobs, skills, temporary accommodation and tourism assets. The chapter's own methodology section confirms that, prior to mitigation, the Scheme is only assessed as potentially affecting employment, skills and training, temporary accommodation, and the local tourism economy....                                                                                                                                                                                                   | There is overlap between socio- economic considerations and other technical topics. These are detailed in other ES chapters in order that each is assessed by the most relevant subject matter experts. The socio-economic chapter therefore focuses solely on those matters which are purely socio- economic in nature, but the Applicant acknowledges that other socio-economic impacts may arise from areas not assessed within this chapter. These are covered in the chapters listed below.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-383 | Broad Study Area Masks Localised Harm The choic Output Ar Figure 14.1 demonstrates that the Applicant's socio- Area for economic 'Local Area' is drawn at a broad South Norfolk scale. The map shows the red Order Limits as a dispersed need to balanc with data but relatively narrow network, while the blue 'Local Area' study are extends over a much wider geography....                                                                                                                                                                                                              | e of Lower Layer Super eas to construct the Local study was informed by the e granularity of analysis availability. The resulting a, as shown in ES Volume 2, .1 - Socio Economic Study cludes the entirety of the its and surrounding ts. As shown in Table 14.7 of 1, Chapter 14 – Socio- 050], this area has ion of 16,600, which is just of the 148,400 in South verall....                                                                                                                     | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-394 | Failure to Assess Local Community and Business Impacts Properly This omission is particularly significant because consultees expressly raised concerns about local communities and businesses. Chapter 14's own consultation table records that Norfolk County Council asked for socio-economic impacts to be scoped in, specifically including implications for local communities and businesses, loss of agricultural land, and wider economic implications....                                                                                                                           | Socio-Economic matters were scoped in following consultation with PINS. ES Volume 1, Chapter 14 – Socio- Economics [APP-050] concluded that there would be significant, beneficial effects on the local economy during all phases of the Scheme, and no significant adverse effects on the tourism industry....                                                                                                                                                                                     | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-385 | Inconsistency with the Applicant's Own Approach in The Doves DCO Application The Applicant's own approach in The Doves shows that East Pye has been selectively narrowed. The Doves Chapter 14 expressly includes land use and commuting patterns as assessed socio-economic effects, alongside employment, skills, accommodation and tourism. The Doves also contains a specific assessment of the 'effect on land uses' and 'changes in commuting patterns'....                                                                                                                           | The Doves Chapter 14 reports impacts sourced from a Transport and Access Chapter 9 and Soils and Agriculture Chapter 11. Comparable analysis is provided for this scheme in ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], for example impacts on traffic delays and farm businesses. As such, the approach hasn't been narrowed but rather an alternative approach to presentation taken.                           | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |

**Table A8: BEPS entries BEPS-386 to BEPS-440**

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                           | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                    |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>BEPS-386</b> | Failure to Assess Agricultural and Farm-Business Economics as Socio-Economic Effects East Pye's local economy is materially rural. Chapter 14 records that agriculture, forestry and fishing account for 5% of employment in the Local Area, which is higher than South Norfolk, Norfolk, Suffolk, the East of England and England. It also records a strong local concentration in construction-related employment....                                         | The Applicant refers to its response to BEPS-384. The assessment of the impacts on farm labour are considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Paragraph 15.8.121 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] concludes that whilst the wider economic effects are difficult to assess: (i) direct expenditure in some supply sectors will decrease, but will increase in other agricultural supply sectors; (ii) the management of sheep requires more labour per hectare tha... | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| <b>BEPS-387</b> | Tourism and the Rural Experience Economy Are Under- Assessed Chapter 14 includes tourism assets, but the assessment remains too generic and too weak for an area where the value of the rural environment, countryside access, tranquillity, heritage setting and local attractions are interdependent. Chapter 14 records 2,580 people employed within the tourism industry in South Norfolk and notes a range of tourism baseline data....                    | Socio-Economics: ES Volume 1, Chapter 14 – Socio-Economics [APP-050] assesses the sensitivity of the tourism industry receptor as Medium (Table 14.4). This reflects that the share of South Norfolk's employment in tourism is comparable to the regional level (Table 14.14)....                                                                                                                                                                                                                                                          | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| <b>BEPS-388</b> | Construction Workforce Benefits Are Speculative The Applic chapter cl The chapter's claimed labour-market benefits are not as strong as the Applicant suggests. The Outline Employment, stronger than Skills and Supply Chain Strategy states that construction is In ES Volu expected to support an average of 278 workers per day, Economics with a peak of 720 workers, equivalent to 604 FTE jobs....                                                       | ant does not agree that the aims labour-market benefits suggested. me 1, Chapter 14 – Socio- [APP-050], BRES data on y construction workforce is ovide a realistic estimate of tion of the workforce which inate from the local area Table 14.22). The magnitude employment impacts is nd found to be Negligible Norfolk, Norfolk, and the East of England, reflecting the limited size of estimated impacts in the context of total resident employment.                                                                                   | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| <b>BEPS-389</b> | The ESSCS Is Outline, Aspirational and Deferred The deta The Outline Employment, Skills and Supply Chain Strategy Supply Chain S repeatedly uses soft and contingent language: the prepared Applicant 'will seek opportunities', 'will explore Draft DC collaboration', 'may include', and 'will consider' various by conti measures....                                                                                                                        | iled Employment, Skills and strategy (dESSCS) to be as per Requirement 19 of the O [AS-023] will be informed nuous engagement with keholders. The timeline for of the dESSCS is set out 7.1 of the Outline nt, Skills and Supply (Outline ESSCS) The dESSCS will be in ce with this and is secured by                                                                                                                                                                                                                                       | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| <b>BEPS-390</b> | No Meaningful Community Benefit Package There is no meaningful community benefit package proportionate to the scale and duration of the Scheme. What East Pye offers is essentially a labour-market and outreach strategy: apprenticeships, local recruitment channels, education links, site visits, supplier events and annual reporting. That is not the same thing as a genuine community benefit offer....                                                 | The Community Benefit Fund does not form part of the DCO Application. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects. The Applicant will continue engagement post-application, to support the development and delivery of community benefits. on the mechanics of the enefit Fund and the areas will contribute will be hrough consultation with k Council and Norfolk cil.                                                    | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| <b>BEPS-391</b> | Fragmentation Across Chapter 14, the ESSCS and the EQUIA A major defect in the application is that socio-economic and community effects are dispersed across several documents, which obscures the real planning balance. The EQUIA expressly states that it draws on Chapter 14 and the Outline ESSCS, and assesses disproportionate and differential effects on protected groups rather than replacing the core socio-economic assessment....                 | The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. The Equality Impact Assessment [APP-214] draws on the findings of the Environmental Statement, including ES Volume 1, Chapter 14 – Socio- Economics [APP-050], and relevant management plans to assess whether Scheme impacts could result in differential or disproportionate effects on protected characteristic groups....                                                             | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| <b>BEPS-392</b> | Over-Reliance on Mitigation to Reduce Harms to 'Neutral' The EQUIA is highly mitigation-reliant. It repeatedly identifies pathways for adverse effects on older people, disabled people, children, carers and pregnant people, but then classifies most impacts as 'neutral' post-mitigation. See PRoW severance, traffic intimidation, accessibility impacts, noise and vibration, and dust and air pollutants....                                             | The Applicant does not agree that the Equality Impact Assessment [APP- 214] gives insufficient weight to potential equality effects. The assessment identifies a range of potential adverse impacts that may disproportionately affect protected characteristic groups, including older people, disabled people, children, carers and pregnant people, and considers whether these effects would be differential or disproportionate compared with the wider population....                                                                 | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| <b>BEPS-393</b> | Consultation Concerns and Unequal Participation The EQUIA also acknowledges that comments were raised about the quality and extent of consultation, and says this may have had a dampening effect on engagement, particularly for equalities groups including people with disabilities and those with greater time constraints. BEPS has also had to complain about the inaccessibility of the DCO application documents, which are online available online.... | The Applicant acknowledges the concerns raised regarding consultation accessibility and participation. The Equality Impact Assessment [APP- 214] recognises that accessible and inclusive consultation can help reduce barriers for protected characteristic groups, including older people, disabled people, carers, non-native English speakers and those with time constraints....                                                                                                                                                       | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-394</b> | Residential Receptors, Amenity and Perceived                                                                                                                                                                                                                                                                                                                                                                                                                    | Residential receptor impacts are without the scope of ES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Answered                    | Some - fuller                               | Partly. The Applicant states                                                                                                  | The Applicant gives an issue-specific explanation                                                                                                                                                                     | \$2.19 Socio-Economics - cross-                                                                                                                          |

| ID                                     | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                     |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>(second occurrence in EXAM/8.8)</b> | Value Impacts Residential receptor impacts should not be diluted within broad socio-economic averaging. Figure 7.9 identifies multiple named residential properties within 100m of the Scheme. Those receptors are primarily relevant to private visual amenity and living conditions, and therefore belong principally within Chapter 7 and the Residential Visual Amenity Assessment....                                                                                                                              | Volume 1: Chapter 14 – Socio-Economics [APP-050], which is set out in paragraph 14.1.4 of that document. The Applicant has prepared a Residential Visual Amenity Assessment [RVAA], as presented in ES Volume 2, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]....                                                                                                                                                                                                                                                       |                             | explanation or data                         | a substantive position, but the underlying evidential or merits dispute is not thereby resolved.                              | or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                                                   | checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                            |
| <b>BEPS-395</b>                        | Distributional Inequality and Economic Fairness The Equa [APP-214 The application fails to address the unequal distribution of Scheme c burdens and benefits. dispropo The Scheme's benefits are presented in regional and characte diffuse terms: construction activity, national energy consulta objectives, some skills activity, some supplier opportunities. and deco But the adverse burdens are highly local: visual change, range of traffic, PRoW disruption, farm-business and tourism PRoW sev business i... | lity Impact Assessment ] assesses whether the ould result in differential or rionate effects on protected istic groups across tion, construction, operation mmissioning. It considers a impact pathways, including erance, access to infrastructure, traffic-related intimidation, changes in oise, air quality, mental , tourism and employment. ssment also identifies l benefits, including tion employment supporting 1,044 net direct and jobs, around 29 of which are ted to be taken by South residents, alongside wider traini... | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| <b>BEPS-396</b>                        | Consequence for the Planning Balance For all of these reasons, Chapter 14 does not provide a reliable basis for concluding that East Pye Solar will generate a favourable socio-economic balance for host communities. The chapter is too narrow in scope, too broad in spatial framing, too fragmented across documents, too speculative in its claimed benefits, too reliant on mitigation to neutralise harms, and too weak in its treatment of concentrated local burdens....                                       | The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050].                                                                                                                                                                                                                                                                                                                                                                                         | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| <b>BEPS-397</b>                        | Conclusion Chapter 14 substantially understates the socio-economic consequences of East Pye Solar. It confines the assessment to a narrow set of topics, uses a broad study area that masks concentrated local impacts, omits important rural business and land-use effects, relies on an outline and aspirational ESSCS for its positive case, and fails to provide any meaningful community benefit or compensation package....                                                                                       | The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. The Applicant's response to the points raised here in relation to the Outline Employment, Skills and Supply Chain Strategy [APP-205] is in BEPS- 388....                                                                                                                                                                                                                                | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.             |
| <b>BEPS-398</b>                        | Remedies sought As discuss the Applic The Applicant should be required to prepare and submit a ES Volume revised socio-economic assessment that: Economics • expands the scope of Chapter 14 to include land-use with the E effects, farm-business effects, commuting impacts, rural more widel business disruption, community cohesion, distributional necessary, equity and long-term opportunity cost; Scoping Re • uses a more granular host-community and parish-level a range of assessment, rather than rely...  | ed in previous responses, ant feels that the scope of 1, Chapter 14 – Socio- [APP-050] is appropriate, nvronmental Statement y covering all areas ES Volume 3: EIA port [APP-113] identifies potential socio-economic ncluding those which would be other chapters. It had proposed to scope out purely omic matters (Employment ; Economic Output; Tourist ion; Tourism; Shops) (see ; however, ES Volume 3, g Opinion [APP-114] from that these should be scoped not, however, challenge the allocation of topics (e.g....              | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| <b>BEPS-399</b>                        | Chapter 15: Soils and Agricultural Land Introduction BEPS objects to the applicant's assessment of soils, agricultural land and farm business effects. The application does not provide a complete, coherent or reliable baseline for all land to be affected by the scheme....                                                                                                                                                                                                                                         | These comments are noted but the criticisms are not accepted. Effects on soils and agricultural land are fully assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP- 051].                                                                                                                                                                                                                                                                                                                                              | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| <b>BEPS-400</b>                        | This proposal for utility scale solar on productive farmland is contrary to the March 2026Land Use Framework, which preferentially reserves the best land for food production. On 18 Mar 2026 — The Land Use Framework for England was published by the Government setting out how it felt the UK can use its land more effectively. It restricts the use of solar developments on the Best and Most Versatile land....                                                                                                 | The comments are noted. NPS EN-3 recognises that, at scale, ground mounted solar developments may use some agricultural land. Paragraph 2.10.21 of NPS EN-3 provides that where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of BMV agricultural land where possible....                                                                                                                                                     | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-401</b>                        | The Land Use Framework represents new national policy and guidance. It is generally accepted that the quantity of BMV land in England is between 39% or 42%. Considering the East Pye proposal, which the promoters' evidence shows is around 80% BMV land, exceeds the national proportion of such land by a factor of over two, and that only 3pc is unproductive, the proposal is contrary to national land use policy....                                                                                           | The statistic of around 42% of agricultural land in England being BMV was correct at the date of the assessment. However, that figure has now been superseded by new ALC predictive mapping. The Predictive Agricultural Land Classification Map for England (Defra, 2026) has provided an estimate of the area of BMV in Norfolk, which supersedes earlier estimates....                                                                                                                                                                 | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-402</b>                        | The scheme affects extensive BMV land The reason adverse of The applicant's own material shows that the scheme is set out in dominated by BMV land. The ES Chapter 15 table Soils and identifies                                                                                                                                                                                                                                                                                                                        | for the determination of the fects on agricultural land are ES Volume 1, Chapter 15 – Agricultural Land [APP- elates to the permanent loss r the NG Substation and tree mostly Grade 2....                                                                                                                                                                                                                                                                                                                                                | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not                   | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS                 | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific                                             |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                     |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | 397.4ha of Grade 2 land and 431.7ha of Grade 051] and r 3a land, amounting to 829.1ha of surveyed BMV land. Figure 15.1 visually confirms that the principal development of land fo planting, parcels are overwhelmingly Grade 2 and Grade 3a....                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                      |                                             | thereby resolved.                                                                                                             | representation.                                                                                                                                                                                                       | determination is made there.                                                                                                                              |
| BEPS-403 | The BMV calculations are inconsistent and misleading. The application does not present one coherent, fully evidenced scheme-wide BMV figure. At PEIR stage, the applicant's figures were presented as 86% BMV in the surveyed area, with around 40% Grade 2 and 40% Grade 3a. The detailed PEIR ALC appendix gave 435.8ha Grade 2 and 431.7ha Grade 3a out of 1,077.6ha surveyed....                                                                                                             | The ALC for Sites 1 – 10 plus the BESS are set out in Table 15-6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. These have identified 829 ha of BMV, with 16.4 ha not surveyed. The CRC has not been surveyed. As described in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] at 15.8.34, trenches may be up to 7m wide within a generally 25m working corridor....                                                                                                        | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-404 | The ALC and soil baseline remains incomplete because the CRC is unsurveyed. The Outline SRMP expressly states that no soil survey has been undertaken for the CRC and that, before work commences on the CRC, a survey of soil physical characteristics and land quality will be completed. The Outline Cable Route Construction Statement says the same thing: a detailed agricultural land survey and soil survey of the CRC will be undertaken only prior to commencement of construction.... | The construction of the CRC will be controlled by a detailed SRMP, which is secured by DCO Requirement. The installation of cables is a temporary work. It will be controlled through a detailed Soil Resources and Management Plan, to be controlled by DCO requirement. Pre-entry surveys will identify the soil type and quality prior to construction. The soils will be removed in order, and replaced in order, such that post installation of the cables the same soils profile will be restored....          | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-405 | CRC soil survey is especially critical because haul roads, access and trenching are proposed across the corridor. The absence of CRC survey is even more serious because the applicant now proposes substantial physical works and trafficking within the corridor. The Outline Cable Route Construction Statement confirms temporary internal haul routes, access tracks, laydown areas, spoil storage, temporary construction compounds and cable trenching within the CRC....                 | Detailed ALC and soil surveys are proposed before construction works commence, as set out in the Outline SRMP [APP-204] at section 3. A detailed SRMP will be a DCO Requirement. Cable works are temporary works and, provided that good practice is followed, the works will not result in any long- term adverse effects on soil structure, and no adverse effects on agricultural land quality....                                                                                                                | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-406 | The site's clay-rich, water-sensitive soils are vulnerable to structural damage. The applicant's own material establishes that the site is dominated by Beccles 1 Association soils, described as slowly permeable, seasonally waterlogged fine loamy over clayey soils, with Burlingham 1 soils in places having slowly permeable subsoils and seasonal waterlogging....                                                                                                                        | Sensitivity of receptors are set out in Table 15.3 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. As described in Table 15.3 high clay soils with a FCD <150 are classified as medium sensitivity in line with the ISEP guide "A New Perspective on Land and Soil in Environmental Impact Assessment". Soil sensitivity in ES terms does not affect the Outline SRMP [APP-204]. This is because the purpose of the soil management works is to ensure that soil structures are not affected.... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-407 | The applicant has not robustly analysed lasting damage from haul roads and access tracks. The application does not contain a robust, quantified assessment of lasting damage to BMV land from haul roads and access tracks....                                                                                                                                                                                                                                                                   | The potential effects of tracks have been considered in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. This concludes that these areas are capable of full restoration without adverse effects or loss of land of BMV quality. Temporary construction tracks for access and haul roads will be restored as part of the construction works. These areas will be subject to decompaction works as necessary and returned to agricultural use at the end of the construction phase....                 | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-408 | The methodology is structured to minimise long-duration but 'temporary' harm. The applicant's methodology tends to classify temporary development as low magnitude where works are said to be reversible. A 60-year scheme on BMV heavy clay soils, with access tracks, trenching, compounds, substations and repeated operational replacement cycles, cannot be treated as if any temporary disturbance is inherently minor just because restoration is asserted....                            | Paragraph 15.5.19 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] explains that temporary effects are classed as low magnitude impacts. The ISEP guide does not distinguish between short term and long-term temporary impacts. Whilst works that are reversible are classified as temporary, any works that result in loss or downgrading of agricultural land or soils have been classified as permanent....                                                                                    | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-409 | The scheme entails repeated whole-life disturbance, not The Outli one-off construction effects that a de to incorp. The application understates the frequency and duration of measures. soil disturbance. The Outline SRMP assumes an 204] stat operational life of 40 years for solar panels and states that all solar panels will be replaced once during the operational during th phase, taking a maximum of 24 months....                                                                   | ne SRMP [APP-204] sets out tailed SRMP will be completed orate decommissioning. The Outline SRMP [APP- es any damage caused e construction and operational rectified in the following                                                                                                                                                                                                                                                                                                                                | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-410 | The applicant's case on reversibility is inconsistent with emerging empirical evidence. Published UK evidence now materially undermines the applicant's optimistic assumptions on reversibility....                                                                                                                                                                                                                                                                                              | NPS EN3 2025 sets out that solar farms have the potential to increase biodiversity values of sites which can result in significant wider environmental benefits and enchantments. EN3 further recognises that solar can be easily decommissioned. As set out in the Outline SRMP [APP-204] a detailed SRMP will be completed to                                                                                                                                                                                      | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | incorporate decommissioning measures, which will be controlled through a DCO requirement....                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                               |
| BEPS-411 | The application does not properly address damage from storm events or damaged infrastructure The soils assessment does not appear to include any adequate consideration of soil impacts arising from damaged panels, damaged supports or storm-related infrastructure failure. That is a material omission....                                                                                                                                                                                                   | Effects on soils from damaged infrastructure will be included within the detailed SRMP which is secured by DCO Requirement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-412 | The scheme cannot properly be described as temporary in land-use terms The applicant relies heavily on the claim that the use of land for solar is temporary. But the documents do not secure a true return to agricultural use....                                                                                                                                                                                                                                                                              | The Draft DCO [AS-032] secures a Requirement for decommissioning and restoration to ensure that the Scheme, apart from the National Grid Substation and the Grid Connection Infrastructure which will remain in-situ, is decommissioned at the end of the 60-year operational lifetime. In the Outline DEMP [APP-051] the National Grid Substation and the Grid Connection Infrastructure will remain in-situ....                                                                                                                                                                                    | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-413 | There is no secure guarantee of restoration to former agricultural land quality The Outline SRMP qualifies restoration in several important respects. It says the applicant commits to restoring temporary compounds, tracks and conversion units, but also says that the BESS and Project Substations may not be capable of restoration to comparable ALC grade where deep foundations are required, that the National Grid substation land will not be restored, and that woodland areas will be permanent.... | The Applicant refers to its response to BEPS-411.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-414 | The BNG and decommissioning position is incoherent The decommissioning material also exposes a contradiction between biodiversity gain and agricultural restoration. The Outline DEMP says some habitat, biodiversity mitigation and enhancement areas may be left in situ after decommissioning, while most infrastructure is to be removed and the majority of the sites returned to original use....                                                                                                          | As set out in the Outline DEMP [APP-198], the National Grid Substation and the Grid Connection Infrastructure would remain in situ. The management of all planting for the National Grid Substation will be the responsibility of National Grid Electricity Transmission, and this will remain in place post decommissioning of the Scheme. There is no policy dictating how agricultural land must be used. Agricultural land is brought out of cultivation for a number of reasons. There are 15,000 ha of agricultural land in Norfolk (Table 15.9 of ES Volume 1 - Soils and Agricultural Land). | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-415 | There is no identified decommissioning bond or insolvency- The Applicant provides financial security in the form of a guarantee. The application describes decommissioning works but The Applicant does not identify any secured decommissioning bond, escrow, letter of credit, parent company guarantee or other option to secure the ring-fenced financial provision....                                                                                                                                      | It confirms that, if consented, they have the capability to own and operate the Scheme. The Applicant may also consider the sell or transfer of the Scheme to a suitably qualified party. Less of any future ownership, the Applicant will be bound by the enforceable requirements of the Draft DCO [AS-032] which sets a Requirement for decommissioning and restoration to ensure that the Scheme is decommissioned at the end of the 60-year operational lifetime. Failure to comply with a DCO requirement is a criminal offence.                                                               | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-416 | The farm business assessment is incomplete and understated The farm reports are plainly limited. Appendix 15.2 expressly states that it reports on farms within the Order Limits excluding the Cable Route Corridor....                                                                                                                                                                                                                                                                                          | The ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] includes a detailed assessment of the cropping and stocking across the Site, and the effects of the Scheme on both the individual farms and the wider land-based rural economy. In terms of the effects on farm businesses from the construction, there will be disruptions which will be compensated. The Applicant is engaging with affected parties on the CRC and enter into voluntary arrangements.                                                                                                                          | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-417 | The compulsory acquisition consequences for farm businesses are not properly assessed The application does not seriously grapple with the consequences if compulsory acquisition of freehold land is as set out in exercised. If farmland is permanently taken, the affected 15 – Soils and Agricultural Land business does not continue unchanged....                                                                                                                                                           | The Applicant notes the concerns raised in respect of impact to farming businesses. ES Volume 1, Chapter 4 Agricultural Land and the effects of the Scheme on land and farming have been assessed. In the cable route corridor, the proposed cable installation is a new feature and the land will be used for agriculture.                                                                                                                                                                                                                                                                          | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.19 Socio-Economics - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-418 | The application does not comply in substance with ISEP best practice Although the applicant says Chapter 15 has been checked against ISEP guidance, the application does not comply with that guidance in substance....                                                                                                                                                                                                                                                                                          | The ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] has followed the ISEP Guide, with departures noted and explained. The Applicant has set out in the ES Volume 1 – Soils and Agricultural Land [APP-051]. The CRC is not determined, as or will not be affected except from construction impacts. A soil survey will be carried out before construction. The construction process is described in Chapter 5 - Alternatives and Design [APP-041]....                                                                                                                                | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |
| BEPS-419 | Current Government land-use evidence supports protection of BMV land The 2026 Land Use Framework for England states that Government will safeguard best and most versatile farmland from permanent land use change such as woodland creation and urban expansion, and that updated Agricultural Land Classification data and mapping                                                                                                                                                                             | The Land Use Framework needs to be read in the context of the National Policy Statements for Energy and acknowledges the use of agricultural land, including BMV land, for solar.                                                                                                                                                                                                                                                                                                                                                                                                                    | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                    |
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|          | will be published to strengthen assessment and decision-making....                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                          |
| BEPS-420 | Conclusion The applicant has not demonstrated that this BMV-heavy, clay-rich scheme can be constructed, operated, maintained, repowered and decommissioned without lasting harm to soil structure, agricultural land quality and farm businesses....                                                                                                                                                                                                                                                                   | The use of land of BMV quality for solar is not prohibited. The Applicant has sought to reduce the amount of BMV land within the Scheme as far as practicable considering the high proportion of BMV land in Norfolk. An assessment of the effects on soils and agricultural land is set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051], including an assessment against planning policy. A detailed soil survey and ALC survey will be carried out over the CRC as explained in ES Chapter 15....                   | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-421 | Remedies sought The Examining Authority and Secretary of State are respectfully requested to require, before any recommendation or decision that the scheme is acceptable on soils and agricultural land grounds: • A complete, detailed ALC and soil survey of the entire Cable Route Corridor and all other land to be disturbed, including haul routes, temporary access, compounds, laydown areas and crossing locations....                                                                                       | The Applicant refers to its response to BEPS-420.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-422 | Chapter 16: Ground Conditions, Contamination, Hydrogeology and Mineral Sterilisation Introduction This Relevant Representation concerns the inadequacy of the Applicant's assessment of ground conditions, contamination, hydrogeological risk, private water supplies and mineral sterilisation for the East Pye Solar project. It should be read with ES Chapter 16, Appendix 16.1 Phase 1 Ground Conditions Assessment, Appendix 16.2 Minerals Resource Assessment Desk Study, and Figures 16.1 to 16.4....         | The Applicant refers to its response to BEPS-422 to BEPS-430. The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed through ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114].                                                                                                                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-423 | The assessment is methodologically too narrow The as ES Vol The Applicant's methodology materially narrows the Condit baseline before the analysis even begins. Both Chapter 16 undert and Appendix 16.1 adopt a study area for potentially contaminative land uses of only up to 250 m from the Order methodology The 25 Limits, describing that as 'robust yet proportionate.' identi That approach is unsound for a project spread across a contam large and hydrogeologically sensitive rural landscape with ES... | sessments presented in ume 1, Chapter 16 - Ground ions [APP-052] have been aken in accordance with the agreed following scoping. 0m Study Area for the fication of potentially inative land uses presented in ume 1, Chapter 16 - Ground ions [APP-052] is based on sional judgement, knowledge of cts and the DMRB LA 109 RB LA 113. Although not ly relevant to the Scheme, the Area accords with the Study in Guidance for velopment of Housing on fected by Contamination....                                                           | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-424 | Former RAF Tibenham has been excluded rather than assessed A major flaw in the contamination baseline is the exclusion of former RAF Tibenham. In response to consultation representations specifically raising contamination and PFAS risks associated with the three former RAF airbases at Tibenham, Seething and Hardwick, the Applicant stated that RAF Tibenham 'has not been considered within this Chapter as it is approximately 1.4km off-site to the west'. That is not a hydrogeological justification.... | The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. RAF Tibenham remains excluded as it is 1.4km off-Site and as such is considered highly unlikely to impact the Scheme....                                                                                                                                                                                                                                               | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.  |
| BEPS-425 | The baseline identifies former RAF Hardwick and RAF Seething, but then understates their significance The Applicant's own Appendix 16.1 identifies former RAF Hardwick and former RAF Seething as sources of potential contamination....                                                                                                                                                                                                                                                                               | The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. As described in Tables 5.3 and 5.5 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184], the classification of Low has been adopted as 'Any contamination associated with the historical airfield use is considered likely to be 1) limited, given that the airfield infrastructure within the Order Limits was limited to areas of r... | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-426 | The Applicant's reasoning on private water supplies is assumption-heavy and unsatisfactory The Applicant states in Chapter 16 that, within the 1 km study area around the BESS, National Grid substation and project substations, 29 private water supplies or permitted abstractions were identified, 19 of which are potentially still active, and that none of those are located within 1 km of an SPC within the Order Limits from which contamination could be mobilised by the Scheme....                        | The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The assessment of risks to abstractions (including Private Water Supplies (PWS)) has been undertaken on the basis of the available information....                                                                                                                                                                                                                     | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-427 | Second, the Applicant's conclusion is framed negatively rather than positively proved. It says, in effect, that because none of the identified active                                                                                                                                                                                                                                                                                                                                                                  | The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed                                                                                                                                                                                                                                                                                                                                                                                           | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or                                         | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That                                                                                               | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no                                                                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                          |
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|          | supplies fall within the selected source distance of an on-site SPC capable of mobilisation, no risk has been identified. That is a logical consequence of the Applicant's narrow source list and source-search radius, not a robust demonstration that there are no pathway risks to the aquifer or to named local supplies....                                                                                                                                                                                         | following scoping. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and 3.11 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] and ES Volume 2, Figure 16.5 Locations of Private Water Supplies [APP-109], as shown by in information provided by the Environment Agency...                                                                                                                                                  |                             |                                                     | merits dispute is not thereby resolved.                                                                                       | clarification does not itself demonstrate that an acceptable solution is already established.                                                                                                                                          | separate BEPS-specific determination is made there.                                                                                            |
| BEPS-428 | The 'Diamicton protection' case is over-generalised and not The assessm robustly evidenced ES Volume 1 Conditions The Applicant relies heavily on the proposition that the undertaken superficial Diamicton provides a low-permeability barrier methodology that prevents contaminants reaching underlying chalk and Crag aquifers....                                                                                                                                                                                   | ents presented in , Chapter 16 - Ground [APP-052] have been in accordance with the agreed following scoping. Whilst the variable nature of Diamicton is recognised, it remains a predominantly cohesive stratum and whilst more granular and water-bearing layers/lenses may be present, these are unlikely to be laterally and vertically extensive....                                                                                                                                                                                   | Answered                    | Yes - factual clarification / future work confirmed | No. It provides clarification but confirms that material work remains to be done later.                                       | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.      |
| BEPS-429 | Site 3 and Site 10 sit in legacy contamination clusters, not isolated benign farmland Figure 16.3 is shows only eight mapped sources of potential contamination across the whole project: former RAF Hardwick, former RAF Seething, Market Lane Pit, former refuse tip, landfill off west side of Shelton Airfield Disused, sewage works, landfill off B1135, and a vehicle servicing and repair garage....                                                                                                              | The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The 250m Study Area for the identification of potentially contaminative land uses presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] is based on professional judgement, knowledge of similar projects and the DMRB LA 109 and DMRB LA 113....                                                                                                        | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.21 Ground Conditions - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-430 | The use of older data and interpreted boundaries adds further uncertainty The Applicant accepts that some of the historical mapping, geological information and ground condition data supporting the ES was procured in 2024 during scoping and not updated for the ES on the basis that the ground conditions themselves would not have changed, notwithstanding that the earlier Groundsure boundary differed from the Order Limits and had to be interpreted in relation to the final scheme....                      | The assessments presented in ES Volume 1, Chapter 16 Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The 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....                | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.      |
| BEPS-431 | The assessment of mineral sterilisation is preliminary, assumption-based and underplays long-term harm Appendix 16.2 is expressly only a first-stage qualitative desktop study. It concludes that less than 4% of the Order Limits overlie safeguarded sand and gravel resources and that those resources are not presently considered economically viable or practical to extract, largely because of their limited area and constraints such as ecological designations, watercourses, roads and residential prope...  | The assessments presented in ES Volume 1, Chapter 16 Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. Norfolk County Council, the Minerals Planning Authority, have stated "The County Council has been involved in discussions with the applicant's consultants regarding mineral resources and the potential for impacts from the proposed scheme" and "the County Council considers that the issue of mineral resource safeguarding has been correctly addressed in the... | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | §2.21 Ground Conditions - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-432 | The cumulative picture is one of uncertainty, assumption and deferral, not a robust absence of significant effects Taken together, the chapter, appendices and figures do not The assessme support the confident conclusion that no significant ground ES Volume 1 condition or groundwater effects would arise....                                                                                                                                                                                                      | The Applicant refers to its response to BEPS-422 to BEPS-430. nts presented in , Chapter 16 - Ground [APP-052] have been undertaken in accordance with the methodology agreed following scoping.                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.21 Ground Conditions - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-433 | Conclusion For all of these reasons, the Applicant has failed to demonstrate on a sound and complete evidential basis that the Scheme would avoid significant effects in relation to ground conditions, historic contamination, groundwater pathways, private water supplies and associated geological and mineral issues. The assessment is too narrow in scope, too dependent on assumptions, too reliant on sparse historical data, and too deferential to post-consent investigation and redesign....                | The Applicant disagrees with this conclusion and refers to its response to BEPS-422 to BEPS-430. The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping.                                                                                                                                                                                                                                                                      | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.      |
| BEPS-434 | Remedies sought BEPS respectfully requests that the Examining Authority recommend, and the Secretary of State require, the The Applicant following: the assessme * that the Applicant be required to undertake and submit 16 - Ground a full intrusive ground investigation and updated and the ES V groundwater risk assessment before any final - Phase 1 Gr conclusion is reached on the acceptability of the Assessment [ Scheme, including parcel-specific assessment of former carried out RAF Hardwick, former... | The Applicant refers to its response to BEPS-422 to BEPS-430. It's position remains that nts presented in Chapter Conditions [APP-052] olume 3, Appendix 16.1 ound Conditions APP-184] have been robustly, and in accordance hodology agreed following und investigation will be ost-consent as agreed with the Environment Agency, with the results presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA)....                                                                                                                 | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | §2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.      |
| BEPS-435 | Chapter 17 – Electromagnetic Fields Introduction BEPS objects to Chapter 17 of the Environmental Statement on the basis that it does not provide a lawful or robust assessment of the likely significant                                                                                                                                                                                                                                                                                                                 | The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment upon human health [APP-188]. The Applicant therefore considers this data robust                                                                                                                                                                                                                                                                                                                         | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not                   | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS                                  | §2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-                                 |

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                |
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|                 | effects of electromagnetic fields arising from the Scheme....                                                                                                                                                                                                                                                                                                                                                                                                                                                | and reliable, which has been used to undertake the assessment and draw conclusions....                                                                                                                                                                                                                                                                                                                                                                                                                                            |                      |                                             | thereby resolved.                                                                                                             | representation.                                                                                                                                                                                                       | specific determination is made there.                                                                                                                |
| <b>BEPS-436</b> | Failure to assess ecological receptors as required by the Scoping Opinion The most serious defect is that Chapter 17 does not itself assess ecological receptors at all. Instead, Table 17.1 states that a high-level EMF assessment 'pertaining to human health' has been undertaken in Chapter 17, while EMF effects on ecological receptors, including fish, are said to be considered in Chapter 8. That is inadequate for several reasons....                                                           | The Applicant has assessed potential EMF impacts on ecological receptors (notably aquatic invertebrates, watercourses and bats) within the ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], making reference to ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053] and the EMF chapter referencing Chapter 8: Ecology and Biodiversity. Embedded mitigation and avoidance measures during operational activities are detailed in Outline OEMP [APP- 197]                                                      | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.   |
| <b>BEPS-437</b> | The appendix confirms the assessment is only a human- exposure screening exercise Appendix 17.1 materially strengthens this objection, because it makes explicit that the exercise is limited to 'safe levels for human exposure'. The report purpose states that Pager Power was retained to assess the potential impact of EMF from the Scheme 'with respect to safe levels for human exposure', and that the assessment considers the proposed underground power cables, transformers and substations.... | The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (ES Volume 3, Appendix 17.1 – High- Level Electromagnetic Field Assessment [APP-188]) to determine the impacts upon human health. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions....                                                                                                                    | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-438</b> | Reliance on generic external data rather than scheme- The Applicant specific modelling data, including distances, The methodology is generic and insufficiently tied to the to undertake actual Scheme. Appendix 17.1 states that data from various cable configurations were sourced from EMFS.info Volume 3, Appendix Level Elect and that maximum field data were used where possible....                                                                                                                 | nt has used measured field strength and managed by National Grid e the assessment (ES ndix 17.1 – High-romagnetic Field [APP-188]) to determine upon human health. The herefore considers this data reliable, which has been ertake the assessment and ons. ent has considered the ded for panel areas, battery storage, transformers and cabling infrastructure in accordance with the layout for the scheme...                                                                                                                  | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-439</b> | No proper baseline survey and unjustified desk-only The Applicant approach health rec The chapter admits that the assessment is limited to desk- varying EMFs based analysis and that no site surveys have been Table 1 of undertaken or are anticipated. It says desk-based analysis (ES Volume 3 is considered sufficient to assess baseline conditions....                                                                                                                                                | ant outlines that human eptors routinely experience within a regulated range. the technical assessment , Appendix 17.1 – High- tromagnetic Field [APP-188]) outlines the eld strengths of EMF d by humans. The EMFs with the infrastructure as part of the Scheme are defined and established by principles of electromagnetic induction, and therefore a baseline measurement is not typically required....                                                                                                                      | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-440</b> | Threshold compliance is treated as equivalent to EIA adequacy Both the chapter and appendix reduce the exercise to comparison against generic reference thresholds. Chapter 17 says the 1998 ICNIRP safe levels are 100 micro-Tesla for magnetic fields and 5 kV/m for electric fields. Appendix 17.1 uses the same thresholds and says values above them would merely suggest that further investigation is required....                                                                                    | The EMFs associated with the infrastructure as part of the Scheme are defined and established by principles of electromagnetic induction. The Applicant therefore considers the threshold values as outlined by the applicable guidance to be assessed against. The Applicant notes the ICNIRP guidelines introduced in 2010; however, these have not been incorporated into UK Policy. The Applicant therefore considers the thresholds as used in the assessment in accordance with the best applicable guidance and practices. | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |

**Table A9: BEPS entries BEPS-441 to BEPS-494**

| ID              | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>BEPS-441</b> | Sensitive human receptors are not properly addressed The Sensiti to reflect Even within the chapter's narrowed human-health scope, sensitive receptor analysis is lacking. Human health exposed to receptors are simply treated as 'medium sensitivity sources in because people experience EMFs from a man-made (irrespecti environment regularly'....                                                                                                                                                                 | vity is classified as Medium that people are routinely EMFs from a wide range of everyday environments ve of adults, children and ng with medical devices). vity should not be as a judgement regarding health vulnerability. ent [APP-188] considers developed by the ICNIRP to dance when safeguarding ealth receptors, and not ups (i.e. adults or children)....                                                                                                                                                                      | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-442</b> | Substations, transformers and BESS are not properly assessed Another major cause for objection to this application is the treatment of substations, transformers and BESS. The appendix says the assessment considers underground power cables, transformers and substations. But when it reaches those assets, it does not quantify actual field emissions from the East Pye Project Substations or National Grid Substation....                                                                                       | The Applicant has considered all electrical infrastructure part of the Scheme, including underground cables, utilising existing overhead cabling infrastructure, substations, transformers and BESS. The technical assessment within ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188] references CE/UKCA marking to demonstrate that electrical equipment must comply with applicable legislation....                                                                                                  | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-443</b> | Construction and decommissioning have been scoped out too readily Chapter 17 scopes construction and decommissioning out on the basis that the cables will not be powered during those phases. That is too narrow. The chapter says it assesses EMF effects arising from construction, operation, maintenance and decommissioning, but in reality it excludes construction and decommissioning almost entirely....                                                                                                      | The Applicant considers the scoping out of the construction and decommissioning phases as appropriate, as the electrical infrastructure will not be electrically charged. In order for an EMF to be induced, the infrastructure must be carrying a current. Therefore, if infrastructure is not operational (i.e. during construction and decommissioning) then an EMF will not be produced....                                                                                                                                          | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| <b>BEPS-444</b> | Embedded mitigation and additional mitigation are inadequate Mitigation is also underdeveloped. The only clearly articulated mitigation in the appendix is the 15m clearance distance from overhead cables for receptors pertaining to human health. In the chapter, the conclusion is that no additional mitigation is required because no likely significant effects are anticipated....                                                                                                                              | The Applicant's maintained minimum clearance of 15m is drawn from the data presented in the technical assessment within ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188], where the levels of EMF associated with 400kV overhead cables are below the reference levels. In practice, this mitigation measure is observed as National Grid state that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022)....  | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-445</b> | The cumulative assessment is superficial and legally weak The cumulative assessment is particularly weak. Chapter 17 says cumulative effects are theoretically possible where cable infrastructure exists or is buried within the same trench, identifies one development near Tivetshall St Margaret, and concludes that no significant cumulative effect is considered possible because of separation from residential dwellings....                                                                                  | The typical electromagnetic fields for infrastructure associated with the Scheme (sections 4.2-4.3 of ES Volume 3, Appendix 17.1 – High- Level Electromagnetic Field Assessment [APP-188]) are shown to be within and below the acceptable exposure limits of 100 micro-Tesla (µT) for magnetic fields and 5 (kilo-Volts per metre) kVm-1 for electric fields, considering the distance between the electrical infrastructure and human health receptors (i.e. residential dwellings)....                                                | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-446</b> | Internal inconsistency with the project's own scoping and evolution The original scoping report recorded that where proposed cables are over 132kV, PINS guidance requires an EMF assessment appendix including location, routing and voltages of cables over 132kV and a risk assessment to human and ecological sensitive receptors within the zone of influence. It also identified immediately adjacent residential and ecological receptors as the appropriate study context. The ES has not delivered that....    | The Applicant has assessed the specific infrastructure pertaining to the Scheme as outlined in Section 1.2 of the technical assessment ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]. The electromagnetic fields for infrastructure associated with the Scheme are shown to be within and below the acceptable exposure limits, and where it has exceeded these limits, the Applicant has reinforced that a minimum setback distance is to be maintained....                                        | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-447</b> | Conclusion Chapter 17 and Appendix 17.1 do not amount to a robust EIA assessment of EMF effects. They are materially deficient because they: • do not assess ecological receptors within the EMF chapter, despite the Scoping Opinion expressly requiring risks to human and ecological receptors to be addressed; • are confined to a high-level human-exposure exercise; • rely on generic EMFS.info and "typical" infrastructure values rather than East Pye-specific modelling; • contain no proper measured bas... | The Applicant has considered EMF impacts upon human health with respect to accepted guidance and reference levels by UK policy. The technical assessment within ES Volume 3, Appendix 17.1 – High- Level Electromagnetic Field Assessment [APP-188] presents that The electromagnetic fields for infrastructure associated with the Scheme are shown to be within and below the acceptable exposure limits, and where it has exceeded these limits, the Applicant has reinforced that a minimum setback distance is to be maintained.... | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.23 Electromagnetic Fields - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.          |
| <b>BEPS-448</b> | Remedies sought BEPS requests that the Applicant be required to provide a revised and expanded EMF assessment before the examination can properly test this topic. That revised assessment should: • assess both human and ecological receptors within a coherent EMF chapter; • include scheme-specific modelling of all 132kV and 400kV cables, substations, transformers, BESS and grid interface                                                                                                                    | The Applicant refers to its response to BEPS-435 to BEPS 447.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                                                | EXAM/8.10 cross-check                                                                                                                                                      |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | works; • identify and assess sensitive receptors including children, PROWs, homes, bats, fish and white-clawed...                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                             |                                                     |                                                                                                                               |                                                                                                                                                                                                                                        |                                                                                                                                                                            |
| BEPS-449 | Chapter 18 – Other Environmental Matters Introduction BEPS objects to Chapter 18 of the Environmental Statement on the basis that it adopts a downgraded and overly selective approach to matters that are central to the safety, deliverability, environmental risk and human consequences of the Scheme....                                                                                                                                                                                                          | The topics to be included within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] were agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) and statutory consultation. Each topic within ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] provides a summary of how relevant Scoping Opinion comments have been addressed. The approach to Other Environmental Matters is considered to be proportionate, in line with EIA good practice. | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |
| BEPS-450 | Inappropriate 'high-level' treatment of significant matters The chapter's own methodology undermines confidence in its conclusions. A chapter that deals with major accidents, utility conflicts, high-pressure gas infrastructure, BESS fire risk, aviation glare and human health ought not to proceed on the premise that a full Chapter 2 methodology is unnecessary. The project is geographically extensive, infrastructure-heavy and close to sensitive receptors....                                           | See response to BEPS-448. ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] is considered to provide a proportionate assessment of effects for these topics. Each topic sets out the assessment methodology and identifies the relevant mitigation measures relied upon within the assessment of effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP- 205].                                                                                              | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.24 Major Accidents and Disasters - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-451 | Major accidents and disasters MAD.1 Scoping-out does not resolve the substance of the risk The chapter states that major accidents and disasters have been 'sufficiently addressed' and pose no likely adverse significant effects, while also confirming that this topic is scoped out of further assessment....                                                                                                                                                                                                      | It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects....                                                                | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.24 Major Accidents and Disasters - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                |
| BEPS-452 | MAD.2 BESS fire, toxic release and contaminated firewater remain inadequately assessed The chapter records concerns raised in consultation about hydrogen fluoride release, prolonged BESS fires, fire suppression, PFAS contamination, groundwater and river pollution, and the location of the BESS relative to sensitive receptors and drinking water protection areas. The response is essentially that these issues are addressed by the Outline BSMP and by cross-reference to the Water Environment chapter.... | It was agreed with through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. The scope of the assessment presented is therefore appropriately proportionate. The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC)....                         | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The response gives a substantive explanation, but it also confirms reliance on later design, investigation, assessment or approval. That clarification does not itself demonstrate that an acceptable solution is already established. | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-453 | MAD.3 HSE consultation zones and gas-main interaction are serious constraints The chapter records that HSE identified consultation zones affecting several site areas and cable corridors, including the Natural Gas 5 Feeder pipeline. The applicant's response is engagement, easements and future location checks such as LSBUD....                                                                                                                                                                                 | The Applicant has considered utilities in the design of the Scheme, including the high-pressure gas main. Offset to utilities from infrastructure of the Scheme are shown on the Works Plan [AS-002 and AS-003]. The Draft DCO [AS-032] includes for Protective Provisions in Schedule 14 to safeguard utilities assets and associated operations.                                                                                                                                                                                    | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.2 Consultation and Engagement - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                   |
| BEPS-454 | MAD.4 UXO risk is still deferred The chapter records that PINS expected further commitment on UXO because the nature and extent of the risk remained unclear. The response remains future detailed study and possible further surveys, rather than a concluded assessment. This is another example of deferral rather than resolution.                                                                                                                                                                                 | The ExA confirmed within the Scoping Opinion that 'The Applicant should commit to further UXO surveys in order to identify the full extent of the risk and inform appropriate mitigation'. As secured within the Outline CEMP [APP-197], the detailed CEMPs will include the UXO mitigation measures recommended within ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment, Annex 6 UXO Desk Study and Constraints Assessment [APP-184]....                                                                            | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                         |
| BEPS-455 | Telecommunications, utilities and infrastructure The utilities map shows conflict, not resolution The utilities section confirms numerous utility assets within the Order Limits, including Openreach, Gigaclear, B4RN, Anglian Water assets, Cadent gas assets and National Gas Transmission high-pressure gas infrastructure....                                                                                                                                                                                     | The Applicant refers to its response to BEPS-453.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                                      | \$2.25 Telecommunications, Utilities and Television - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-456 | High-pressure gas main risk remains a core objection The presence of a high-pressure gas pipeline through multiple development parcels is a major planning and safety issue, not a minor utilities matter. Chapter 18 does not satisfactorily assess whether solar infrastructure, substations, construction compounds, trenching, abnormal loads or worker facilities are compatible with the consultation zones, easements and safety requirements applying to that asset....                                        | The assessment provided within ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] is suitably proportionate and mitigation measures, as detailed in response to BEPS-453, have been embedded into the Scheme.                                                                                                                                                                                                                                                                                                              | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation.                  | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.              |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Audit classification        | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BEPS-457 | Other infrastructure interdependencies are not properly integrated The chapter does not present a convincing integrated assessment of how utility constraints interact with other risks: for example, whether a gas-main incident, flood event, electrical fault or firewater escape could trigger combined consequences. These interdependency risks are central for a dispersed NSIP of this kind and are not answered by mapping alone.                                                                              | It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. The scope of the assessment presented is therefore appropriately proportionate.                                                                                                                                                                                                                                                    | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-458 | Glint and glare GG.1 The appendix does not show absence of effect Appendix 18.1 concludes that there is no significant impact on road safety or residential amenity, and that solar reflections towards all aerodromes could be operationally accommodated subject to consultation. However, the underlying results are far less reassuring. Solar reflections are geometrically possible along 4.2 km of the A140 and 7.9 km of the B1527. They are also geometrically possible towards all 482 assessed dwellings.... | The Applicant has assessed impacts upon road safety, residential amenity and aviation activity in accordance with applicable and available guidance and industry best practices. The assessment considers the geometric possibility of a reflection, and the predicted impact with respect to the existing environment. Where required, mitigation has been proposed with factors such as the height calculated. This methodology has been implemented on many NSIPs and DCOs.                                                  | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.26 Glint and Glare - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-459 | GG.2 Reliance on proposed planting and desk-based The A screening condl imple For roads, the conclusion of no significant effect depends in part on 'the Scheme's proposed landscape mitigation' for when impact signl remaining B1527 sections within the driver's primary field of view. For dwellings, 46 of the 68 dwellings left after initial consi as pa screening are reduced to low impact by proposed there landscape mitigation....                                                                          | pplicant has considered existing tions, which has led to menting mitigation measures s were considered ficant. The Applicant has also dered where views may remain rt of a robust assessment, and fore acknowledges that the t would be low (as opposed to a ) even after implementing .                                                                                                                                                                                                                                        | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-460 | GG.3 Aviation effects are more serious than the summary suggests The appendix states that yellow glare, defined as 'potential for temporary after-image', is geometrically possible towards the approach path or final section of visual circuits for all assessed aerodromes....                                                                                                                                                                                                                                       | The Applicant considers this comment relies on the geometrical modelling results without considering the operational context which these values, and moreover, the impact, which these values are interpreted. Further, analysis where yellow glare is predicted is shown to coincide with views of the sun, or occur in instances behind a pilot and not within the field of view.                                                                                                                                             | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.26 Glint and Glare - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-461 | GG.4 Norfolk Gliding Club / Tibenham-specific results show moderate impacts Appendix J goes further. It states that 38 circuit and approach paths were modelled for powered and gliding aircraft and records 'moderate impact' predictions for several 08-direction circuit variants, including 08 LHD Power Minimum and Maximum, 08 LHD Glider Minimum and Maximum, 08S LHD Glider Minimum and Maximum, and 08L LHD Glider Minimum and Maximum....                                                                     | The Applicant has illustrated the instances of yellow glare towards the modelled receptors for Norfolk Gliding Club in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [APP- 189 to 193]. The analysis has shown that instances of yellow glare are behind a pilot and not within the field of view.                                                                                                                                                                                                                    | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.28 Aviation - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                        |
| BEPS-462 | GG.5 The cumulative assessment is too narrow The cumulative glint and glare assessment is expressly 'high-level' and considers only one existing solar development to the west. That is plainly inadequate in the wider Norfolk context and does not reflect the cumulative solar/BESS burden already raised elsewhere in these representations.                                                                                                                                                                        | The Applicant has considered cumulative effects where cumulative impacts are possible. For glint and glare, a cumulative impact is possible when receptors coexist simultaneously for two (or more) schemes. In the case of the Scheme, this is the solar development to the west of Norwich Road, south of Bungay Road, north of Brand's lane and east of Parkes Lane, as other developments, reviewed by the Applicant, are not considered to have a cumulative impact due to the distance from the Scheme and its receptors. | Answered                    | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.26 Glint and Glare - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                 |
| BEPS-463 | Waste and materials The chapter is more developed than at PEIR stage, however, the issue is no longer complete absence of information but adequacy and realism. Given the scheme lifetime, BESS replacement profile and decommissioning burden, the Examining Authority should require close scrutiny of the assumptions underpinning waste volumes, replacement rates, recovery rates and disposal pathways....                                                                                                        | The assessment of waste volumes, replacement requirements, and disposal pathways is assessed in Section 18.5 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]. The Applicant has sought to provide a suitably conservative estimate of likely waste streams based on the current Scheme design and current waste handling practices and capacity, to ensure the assessment identifies the worst-case effects likely to be generated by the Scheme....                                                         | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-464 | Human health The chapter provides only a 'Human Health Summary Statement', not a full integrated health assessment. That is inadequate for a project raising combined issues of fire risk, toxic release, water contamination, traffic, landscape industrialisation, amenity change and stress effects. Health is not confined to noise and traffic; it runs across multiple chapters. A summary statement does not provide a satisfactory assessment of those cumulative and cross-cutting effects.                    | The Human Health Summary Statement within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] was prepared following the Planning Inspectorate's Scoping Opinion, which confirmed that a standalone Human Health chapter was not required. Instead, health-related effects were to be assessed within the relevant Environmental Statement technical chapters and cross-referenced where appropriate....                                                                                                            | Answered                    | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.27 Human Health and Equalities - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-465 | Overall conclusion Chapter 18 does not demonstrate that these matters are minor, fully                                                                                                                                                                                                                                                                                                                                                                                                                                  | The Applicant refers to its response to BEPS-449 to BEPS-464.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information                 | No. The response mainly sends the reader back to                                                                              | The response identifies an existing chapter, appendix or earlier row but does not engage with                                                                                                                         | Relevant thematic section in EXAM/8.10 - cross-checked as                                                                                                     |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                               |
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|          | assessed or incapable of significant effect. Rather, it shows that important matters have been grouped into a catch-all chapter, assessed by reduced or alternative methodology, and then discounted by cross-reference, assumed mitigation and operational accommodation....                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |                                                     | material whose adequacy BEPS challenged.                                                                                      | the particular deficiency alleged in that material.                                                                                                                                                                   | the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                                                 |
| BEPS-466 | Remedies sought The Examining Authority is requested to require the applicant to produce a fuller and more rigorous assessment of Chapter 18 matters, including a project- specific major accidents assessment; quantified consequence analysis for BESS fire, toxic release and contaminated firewater; a proper utilities and gas-main compatibility assessment with stand-offs, easements and quantified risk where required; a revised glint and glare assessment that does not rely so heavily on assumed futur... | The Applicant considers that ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] adopts a suitably proportionate approach, as agreed through the EIA Scoping process.                                                                                                                                                                                                                                                                                                                                                       | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-467 | Chapter 19: Cumulative and In-Combination Effects Introduction The Applicant's Chapter 19 does not provide a robust or legally adequate assessment of the in-combination effects of this Scheme. For a project of this scale, geographic spread and duration, the assessment should identify how multiple harms interact upon the same receptors across construction, operation and decommissioning....                                                                                                                 | 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]....                                                                                                                                                                                                                                                                                                                         | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-468 | Misleading mapping and scoping-out of Tasway Energy Park The Applicant's cumulative mapping is misleading. It depicts other major housing, solar, BESS and infrastructure schemes as single dots rather than showing their actual red-line extent, land-take, linear corridors or zones of influence across the landscape....                                                                                                                                                                                           | The Applicant refers to its response to BEPS-126 regarding the cumulative assessment and ES Volume 2, Figure 2.1 - Cumulative Developments [APP-058]. The EIA Regulations require the assessment to take into account 'the cumulation of effects with other existing and/or approved projects...' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's Advice on Cumulative Effects Assessment....                                                                                                      | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-469 | The methodology is too narrow and excludes many real effect interactions Chapter 19 states that in-combination effects have only been considered where residual adverse or beneficial effects of at least slight or minor have been identified for a receptor group. It further states that, to qualify, an effect must be minor or greater and must share a receptor with another effect....                                                                                                                           | In-combination effects refer to the inter-relationship between individual development effects between topics, therefore the in-combination effects assessment is appropriately based upon the residual effects presented within each topic chapter. See earlier responses regarding the technical assessment methodologies and mitigation measures. ie effects have not been ed within the in-combination assessment. Negligible effects ned as 'an effect that is likely to egligible or neutral influence, tive of other effects'.... | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-470 | The chapter reduces the receptor groups to an implausibly small set Chapter 19 says that the receptor groups likely to experience significant in-combination effects during construction and decommissioning are 'local residents and users of the local area', and during operation are 'local residents and users of the local area' and 'ecologically- designated sites'. That is plainly under-inclusive for East Pye Solar. This Scheme is not a compact site....                                                  | Stage 1 of the in-combination effects assessment is identifying 'receptor groups' based on whether a sensitive receptor is exposed to more than one type of residual effect across the ES topics. The term 'receptor-group' is used to highlight that the approach taken for the in-combination does not assess every individual receptor assessed at the EIA stage, but rather potentially sensitive groups of receptors identified through the EIA process....                                                                        | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.7 Construction and Decommissioning - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.       |
| BEPS-471 | The assessment improperly depends on contested or incomplete topic chapters Chapter 19 is only as reliable as the chapters beneath it. Where underlying topic assessments remain partial, heavily mitigated on paper, dependent on future control plans, or otherwise disputed, Chapter 19 cannot simply treat their residual effects as settled inputs to a concluding matrix....                                                                                                                                      | The in-combination effects assessment within ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] is appropriately based upon the residual effects presented within each topic chapter, which are considered to provide a robust basis for the assessment. See earlier responses regarding the technical assessment methodologies and mitigation measures.                                                                                                                                                             | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-472 | Failure to assess the real combined burden on residents and communities The chapter does acknowledge that residents and users of the local area may experience significant in-combination effects. However, the way it does so is superficial....                                                                                                                                                                                                                                                                       | ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] assesses the potential for in-combination effects on the surrounding land uses, including places of work and the local road network. It is acknowledged that during the construction, operational, and decommissioning phases, potential individual environmental effects in isolation have been identified which may have an impact on local residents, as well as on people using the local area....                                                            | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                  |
| BEPS-473 | Failure to assess combined effects on transport users, rural ES Volume lanes and rights of way and Ac Volume Chapter 19 lists driver and passenger delay, user and Transp pedestrian safety and severance of communities under 177) a transport,                                                                                                                                                                                                                                                                        | 1, Chapter 11 - Transport cess [APP-047] and ES 3, Appendix 11.1 – ort Assessment [APP-174] to sssess the effects of construction he Local Highway Network, ing cumulative effects with other pments. The cumulative pments included within the ort assessment were agreed                                                                                                                                                                                                                                                              | Answered                    | Some - fuller explanation or data                   | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made                         |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Audit classification        | New information?                  | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                               |
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|          | but then largely reduces the in-combination conclusion for construction / decommissioning to a generic traffic on t nclud residents/users category....                                                                                                                                                                                                                                                                                                                                                                  | nty Council as the Highway Authority. s on PRoW users has also been ered....                                                                                                                                                                                                                                                                                                                                                                                                                          |                             |                                   |                                                                                                                               |                                                                                                                                                                                                                       | there.                                                                                                                                                              |
| BEPS-474 | Failure to assess combined effects on water, flooding and private water supplies One of the clearest deficiencies in Chapter 19 is its failure to grapple with the interaction between water-related impacts....                                                                                                                                                                                                                                                                                                        | ES Volume 1, Chapter 9 – Water Environment [APP-045] considers the effects on the Water Environment as a result of the Scheme, with identified receptors including hydrological receptors (watercourses and designated sites), hydrogeological (aquifers, groundwater dependent terrestrial ecosystems, bedrock/superficial deposits), public/private water supplies, water resource zones, and source protection zones (private water supplies)....                                                  | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                     |
| BEPS-475 | Failure to assess combined effects on heritage assets, Assessme conservation areas and historic landscape first be analysis Chapter 19 treats heritage in an unduly dismissive way. It determin states that visual impacts and changes to heritage setting would re in combination are not significant for heritage assets and approach will reduce over time as planting becomes established. within t That is not an adequate in-combination analysis for a project affecting a very large number of designated an... | nt of Conservation Areas gan with desk study, viewshed , and then site visits in order to e which conservation areas quire further assessment. This is the one recommended he Historic England's guidance s The Setting of Heritage HE 2017), Managing ance in Decision-Taking in the Environment (HE 2015), and ts of Heritage Significance. gnificance in Heritage HE 2019)....                                                                                                                     | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                  |
| BEPS-476 | The chapter does not adequately reflect the broader cumulative context in South Norfolk Although Chapter 19 distinguishes 'in-combination' from 'cumulative' effects, that distinction does not justify ignoring the real development context within which the Scheme's effects will be experienced....                                                                                                                                                                                                                 | The Applicant is aware of other projects in the region. The ES [APP- 042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES....                                                                                                                                                                                                    | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-477 | The operational conclusions on ecological benefits are The as overstated and one-sided Volume Combin Chapter 19 concludes that ecologically designated sites and priority habitats will experience significant beneficial in- [APP-0 assess combination effects during operation because of the techni cessation of agricultural activities and reduced application signif of fertilisers and chemicals, with associated beneficial recept water quality effects....                                                    | essment presented in ES 1, Chapter 19 - In- ation Effects Assessment 55] is informed by the detailed ments set out within other cal chapters. The assessment of icant effects to biodiversity ors, including designated sites, ive habitats, watercourses, ted and priority species, is set detail within ES Volume 1, r 8 – Ecology and ersity [APP-044]....                                                                                                                                         | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-478 | Overall conclusion on Chapter 1G For all of these reasons, Chapter 19 materially under- assesses the in-combination effects of East Pye Solar. Its methodology is too narrow. Its receptor groups are implausibly limited. Its conclusions depend too heavily on contested underlying chapters. It fails to identify and analyse the true overlapping burdens on residents, transport users, water receptors, private water supplies, heritage assets, conservation areas and rural communities....                     | The Applicant refers to its response to BEPS-465-477. For these reasons, the Applicant does not intend to update Chapter 19 in this regard.                                                                                                                                                                                                                                                                                                                                                           | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.30 Cumulative and In-Combination Effects - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-479 | Chapter 20 – Summary of Residual Significant Effects Introduction The Applicant's Chapter 20 is not a neutral administrative summary. It is the document that purports to present, in consolidated form, the final environmental balance of the Scheme after mitigation, and therefore the point at which the Secretary of State and Examining Authority are invited to accept the Applicant's case on residual harm. That makes it a critical chapter....                                                              | ES Volume 1, Chapter 20 – Summary of Significant Residual Effects [APP-056] summarises the significant residual effects of the Scheme. Residual effects are defined as those effects that remain following the implementation of embedded and additional mitigation measures. Residual effects and mitigation measures are discussed in full in the relevant technical chapters [APP-042 – APP-054]....                                                                                               | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                          |
| BEPS-480 | Chapter 20 reveals the true scale of admitted landscape The Applica and visual harm significant The design Chapter 20 is striking in the extent of significant adverse informed by landscape and visual effects it expressly records during construction....                                                                                                                                                                                                                                                            | nt acknowledges the adverse effect identified. of the Scheme has been an environmentally led ith landscape and visual ons embedded into the ciples and design evolution nrastructure. The design f the Scheme in respect of isual context is set out Approach Document rastructure Strategy [AS- en developed which rengthening/reinforcing dgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration.... | Answered                    | Some - fuller explanation or data | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                  |
| BEPS-481 | The chapter presents an artificially simplified picture of non-significant effects Set against those extensive admissions of significant landscape and visual harm, Chapter 20 then presents a broad series of conclusions that there are no significant residual effects for many other environmental topics during construction, including ecology and biodiversity, water environment, cultural heritage, transport and access, noise and vibration, air quality, ground conditions, electric and magnetic fields... | The Applicant refers to its response to BEPS-479.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Deflected / cross-reference | No material new information       | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                  |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit classification        | New information?                                    | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                         |
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| BEPS-482 | The treatment of cultural heritage is not credible. Chapter 20 records no significant residual effects on cultural heritage during construction and no significant residual effects during operation and maintenance. Those conclusions are not accepted....                                                                                                                                                                                                                                             | ES Volume 1, Chapter 20 Summary of Significant Residual Effects [APP- 056] summarises the significant residual effects of the Scheme. The cultural heritage assessment is presented within ES Volume 1, Chapter 10 – Cultural Heritage [APP- 046]....                                                                                                                                                                                                                                                         | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.15 Cultural Heritage - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-483 | The chapter overstates ecological benefit and understates ecological risk, and harm to European Protected Species Chapter 20 states, with no evidence, that there are no significant residual effects on ecology and biodiversity during construction....                                                                                                                                                                                                                                                | ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] presents a summary of residual significant effects identified within the ES. The assessment of significant effects to biodiversity receptors, including sensitive habitats, watercourses, protected and priority species, is set out in detail within ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]....                                                                                                             | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.12 Ecology and Biodiversity - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.        |
| BEPS-484 | The water environment conclusions are unbalanced and misleading Chapter 20 states that there are no significant residual effects on the water environment during construction. It then claims a major beneficial operational hydrological effect resulting from reduced agricultural chemicals and The assesses nutrient loading and identifies a significant cumulative to water beneficial effect on water quality with other solar schemes. habitats, Those conclusions are not accepted....          | ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] presents a summary of residual significant effects identified within the ES. sment of significant effects receptors, including sensitive watercourses and water t out in detail within ES Chapter 9 – Water nt [APP-045]. t in Section 9.8 of ES Chapter 9 – Water nt [APP-045], the Scheme load risk and pollution t mitigation as set out and the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198].... | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.14 Water Environment - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.               |
| BEPS-485 | The cumulative assessment is incomplete and underplays real cumulative burden Chapter 20 states that the cumulative effects assessment is summarised in Table 20.4. However, the chapter records that cumulative landscape effects during short-term construction and decommissioning have not been considered because overlap between the construction periods of East Pye Solar and other schemes is unclear. That is not a satisfactory basis on which to exclude cumulative construction effects.... | ES Volume 1, Chapter 20 Summary of Significant Residual Effects [APP- 056] summarises the cumulative effects of the Scheme. The assessment of cumulative effects are discussed in full in the relevant technical chapters [APP-042 – APP- 054]. The cumulative landscape and visual effects assessment is considered to be a proportionate approach.                                                                                                                                                          | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.10 Landscape and Visual - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-486 | BMV agricultural land The Appli significa One of the most significant admissions in Chapter 20 is its set out w identification of a long-term moderate adverse effect in relation to Best and Most Versatile agricultural land through 15 Soils 051], BES irreversible loss or downgrading, are likel That point should be given substantial weight. worst-cas undertake This is not a mere temporary construction inconvenience....                                                                     | cant acknowledge the nt adverse effect identified. As ithin ES Volume 1, Chapter and Agricultural Land [APP- S and Project Substations y to be restorable, however a e assessment has been n that assumes BESS and Project Substations are not fully restorable, and that mitigation planting is a permanent loss. BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the Site Selection Assessment [APP-215]....                               | Answered                    | Yes - factual clarification / future work confirmed | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.20 Soils and Agricultural Land - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.     |
| BEPS-487 | The summary chapter reflects a wider pattern of minimisation from scoping to assessment Chapter 20 must also be read in light of the Scheme's earlier scoping history. The original scoping approach proposed to scope out or minimise a number of matters that later became significant areas of dispute, including water environment, electric and magnetic fields, waste and materials, socio-economics, human health and ground conditions....                                                       | The Applicant has considered topics within the EIA that have potential for likely significant environmental effects, and the scope of topics to be assessed within the ES were agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP- 114]). ES Volume 1, Chapter 20 - Summary of Significant Residual Effects [APP- 056] summarises the significant residual effects of the Scheme....                                                                            | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-488 | Overall conclusion to Chapter 20 The Applica Volume 1, C Chapter 20 does not provide a reliable or fair summary of Significant the Scheme's true residual environmental effects. It 056] provid correctly reveals extensive and significant adverse landscape and visual harm, but then adopts an unjustifiably the Scheme' effects, wh confident and simplified approach to many other topics, relevant te including heritage, ecology, water, cumulative effects and APP-054]. agricultural land....   | nt considers that ES hapter 20 - Summary of Residual Effects [APP- es an accurate summary of s residual significant ich are detailed within the chnical chapters [APP-042 –                                                                                                                                                                                                                                                                                                                                   | Answered                    | Limited - mainly restates existing position         | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | Relevant thematic section in EXAM/8.10 - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-489 | Accessibility of Documents The Non-Technical Summary is not a reliable standalone guide to the true evidential position BEPS is concerned that the Environmental Statement Non- Technical Summary ('NTS') is not a fully fair or representative account of the underlying ES chapters and appendices....                                                                                                                                                                                                 | The Non-Technical Summary [APP- 166] summarises the findings of the Environmental Statement in a form accessible to interested parties, in accordance with the EIA Regulations. The proposed management and mitigation measures set out in the ES [APP-036 to APP- 195] are comprehensive and robust. ant refers to its response to BEPS-080 regarding the s register.                                                                                                                                        | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.17 Transport and Access - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.            |
| BEPS-490 | Overall planning balance and remedies sought BEPS' summary position is that the Scheme fails the planning balance. The applicant has not demonstrated a compelling need for East Pye Solar in this location or region. It has not shown that less harmful alternatives have been properly assessed. It has not resolved gateway legal issues relating to                                                                                                                                                 | The Applicant has responded to these summary representations in detail in the rows above. The Applicant refers to its response to BEPS-002.                                                                                                                                                                                                                                                                                                                                                                   | Deflected / cross-reference | No material new information                         | No. The response mainly sends the reader back to material whose adequacy BEPS challenged.                                     | The response identifies an existing chapter, appendix or earlier row but does not engage with the particular deficiency alleged in that material.                                                                     | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                    |

| ID       | BEPS point / question                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicant response (EXAM/8.8)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Audit classification | New information?                            | Resolved?                                                                                                                     | Why / outstanding issue                                                                                                                                                                                               | EXAM/8.10 cross-check                                                                                                                                                          |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | protected species, Habitats Regulations, the Water Framework Directive, private water supplies, contamination, heritage protection and procedural fairness....                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                      |                                             |                                                                                                                               |                                                                                                                                                                                                                       |                                                                                                                                                                                |
| BEPS-491 | The mapping in the site selection assessment document (7.20) is inconsistent and misleading. In the earlier mapping, especially Figure 8, the large brown/beige area is labelled as 'Unconstrained Land, including ALC Grade 3 (<3% Gradient)'. That map shows that, once Grade 3 agricultural land is included, there is a very large area of apparently suitable or at least potentially developable land As set out within the search area....                     | The Site Selection Assessment [APP-215] considered Natural England's 1970s Provisional Agricultural Land Classification mapping, which does not differentiate between Grades 3a and 3b. In the responses to representations, at Stage 2 ade 1, 2 and 3 land was rom the initial search area, with the policy expectation ph 2.10.21 of NPS EN-3 that lity land should be preferred ity land, avoiding the use d Most Versatile (BMV) al land where possible. in Section 5.1 of the Site Assessment [APP-215] n 15.6 of ES Volume 1, ils... | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-492 | They accept Grade 3 land for the selected East Pye sites, but when assessing alternatives around the Point of Connection, they initially treat Grade 3 as excluded/constrained, thereby producing an artificially tiny pool of alternatives. Then, only later, they reintroduce Grade 3 land in Stage 6 and acknowledge that doing so introduces 'a significant amount of land' within the 20 km search area that could potentially accommodate solar development.... | As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3 land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used....                                        | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-493 | There is also a second flaw. The report says the original sites were identified through land agents and willing landowners, and that they did not consider every piece of unconstrained agricultural land because of the large extent involved. That means the 'site selection' is largely a land-availability exercise dressed up as a constraints assessment.                                                                                                       | As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. This confirmed that BMV quality land within the Sites amounts to 829.1 ha....                                                                                                                                                                                                                                                                                                    | Answered             | Limited - mainly restates existing position | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.8 Site Selection, Alternatives and Design Evolution - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there. |
| BEPS-494 | In summary, the mapping uses 'unconstrained land' inconsistently. Grade 3 land is included when justifying the applicant's own selected sites, but excluded when screening for alternatives around the Point of Connection, producing a misleadingly small pool of alternative land. Since the proposed scheme itself relies heavily on Grade 3 land, that exclusion is methodologically inconsistent and may materially distort the alternatives assessment....      | As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3 land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used....                                        | Answered             | Some - fuller explanation or data           | Partly. The Applicant states a substantive position, but the underlying evidential or merits dispute is not thereby resolved. | The Applicant gives an issue-specific explanation or factual position. This is a substantive response, although it does not necessarily displace the evidence or methodological criticism in the BEPS representation. | \$2.3 The Applicant - cross-checked as the corresponding generic thematic response; no separate BEPS-specific determination is made there.                                     |

## Overall use of the table

The table should be read with the accompanying BEPS summary submission. Its purpose is not to argue that every disputed answer is legally inadequate merely because BEPS disagrees with it. It identifies where the Applicant has supplied a genuine answer, where it has only restated or cross-referred to its existing case, where the response addresses a different point, and where no substantive response is given. It also records where the Applicant's own answer supplies new information or confirms that material work remains outstanding. Those distinctions are relevant to whether an objection can properly be treated as resolved and, for consultation matters, whether later application or examination material can answer the separate question of what information was available to consultees at the time of consultation.

AI Disclaimer: This analysis was carried out by BEPS's bespoke closed-project GPT.