



East Pye Solar
Statement of Common Ground:
Norfolk County Council

Revision 1
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1 Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the Application) for East Pye Solar (the Scheme) made by East Pye Solar Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available within the Application documents available on the Planning Inspectorate's website ([Documents | East Pye Solar](#)).
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties and where agreement has not yet been reached.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Norfolk County Council (NCC). Collectively, the Applicant and NCC are referred to as the parties.

1.3 Purpose of this Document

- 1.3.1 The SoCG covers topics of the Application within the remit and of relevance to NCC.
- 1.3.2 This SoCG is a 'live' document and will be amended as the Examination progresses, including as more information becomes available and as a result of ongoing discussions between the parties to enable a final version to be submitted to the ExA.
- 1.3.3 The SoCG is intended to provide information for the Examination process, facilitate a smooth and efficient Examination, and manage the amount of material that needs to be submitted. For the purposes of Examination, this SoCG addresses key topic areas set out in **Table 1.1**. Each area of the topic has a unique reference which relate to the topic matter.
- 1.3.4 The Record of Engagement can be found in Appendix A.

Table 1.1: Topic Referencing

Topic	Reference
Scheme Description, Development Consent Order and Securing Mechanisms	NCC SDDCO
Cumulative Assessment and Effects	NCC CAE
Landscape and Visual	NCC LV
Arboriculture	NCC ARB
Ecology and Biodiversity	NCC EB
Water Environment	NCC WE
Cultural Heritage	NCC CH
Transport and Access	NCC TA
Socio-Economics	NCC SE
Soils and Agriculture	NCC SA
Waste	NCC W
Ground Conditions	NCC GC
Compensation and Community Benefit	NCC CB

1.4 Terminology

- 1.4.1 This SoCG summarises the main topics covered and the status of the matter, as outlined in **Table 1.2**.

Table 1.2: Status of Matters

Colour Code	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2 Scheme Description

- 2.1.1 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation.
- 2.1.2 The **Location Plan [APP-005]** shows the Order Limits for the Scheme, which is 1,212.3 hectares of land within South Norfolk (the 'Order Limits').

3 Current Position between the Applicant and Norfolk County Council

3.1 Matters of Discussion

- 3.1.1 The following tables set out the position of the parties by topics, identifying matters agreed, under discussion, or not agreed between the Applicant and NCC at the point of this document being published.

3.2 Scheme Description, Development Consent Order and Securing Mechanisms

Table 3.1: Scheme Description, Development Consent Order and Securing Mechanisms

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC SDDCO - 1	Scheme Description	N/A	NCC is disappointed that the Applicant has selected a National Grid Substation location south of Great Moulton and did not progress with the alternative southern option adjacent to the BESS and East Pye Substation, which NCC preferred. NCC considers that the alternative location would have consolidated transmission infrastructure into a single area, reduced visual impacts, minimised construction disruption, and positioned the infrastructure further away from Great Moulton. NCC is particularly concerned that the chosen design requires the diversion of the existing dual-circuit 400 kV overhead line into the new substation, resulting in up to four additional pylons being constructed in closer proximity to the village.	The Site Selection Assessment [APP-215] explains the rationale for why the National Grid Substation has been located at Site 1b. The Applicant has sought to minimise the need for new overhead cables. Grid connection infrastructure will nevertheless be required between the National Grid Substation and the existing 400 kV overhead line (Norwich Main – Bramford). The Applicant also notes the concern regarding the associated overhead line diversion and additional pylons. The Design Approach Document [APP-212] confirms that the Order Limits were refined to accommodate the grid connection infrastructure, including potential new or replacement pylons between the National Grid Substation and the point of connection. In response to landscape and visual considerations, the National Grid Substation was reorientated from an east–west to a north–south alignment during the design evolution process in order to maximise screening from existing vegetation, reduce visibility from Great Moulton and increase the offset from Narrowgate Way PRoW, as shown on Figure 5.2 - Design Changes around National Grid Substation Post Statutory Consultation, in the Design Approach Document [APP-212] .	Not Agreed
NCC SDDCO - 2	Scheme Description	N/A	NCC is disappointed that the submitted application has failed to narrow down the panel design and still retains options for the use of Single-Axis Tracker Panels (Option A) and/or Fixed Panels (Option B) (ES Volume 1: Chapter 4 – The Scheme [APP-040], paragraph 4.3.8). The County Council at the PEIR stage expressed concern regarding the potential use of tracking solar panels given their height and concerns regarding the uncertainty as to the exact location, design and scale of the new Substations connecting to the wider transmission network.	The Applicant acknowledges the County Council's concern that flexibility remains for either Single-Axis Tracker Panels (Option A) or Fixed Panels (Option B). The Applicant has retained this flexibility within the Application and assessed the Scheme on the basis of the maximum worst-case parameters set out in the Design Principles, Parameters and Commitments [APP-213] . The Design Approach Document [APP-212] explains that the Scheme has been designed using secured parameters rather than a fixed final layout, enabling detailed design to be undertaken post-consent whilst remaining within the assessed design envelope. These measures will be secured through the draft DCO by requiring the authorised development to accord with the certified plans and documents, including the Works Plan [AS-002 and AS-003] and	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				the Design Principles, Parameters and Commitments [APP-213] . Accordingly, whilst flexibility has been retained regarding panel technology and the detailed design of substations, that flexibility is constrained by the parameters, mitigation measures and design principles assessed through the Application and secured through the DCO.	

3.3 Cumulative Assessment and Effects

Table 3.2: Cumulative Assessment and Effects

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC CAE - 1	Cumulative Developments	ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]	NCC has serious concerns about the cumulative impacts of this proposal sitting alongside other types of approved and proposed energy infrastructure NSIPs in South Norfolk, including the major grid connection works being carried out adjacent to Norwich Main associated with the consented Hornsea Project Three Offshore Wind Farm (EN010080); and the proposed new 400 kV overhead power line running between Norwich and Tilbury (EN020027). Whilst NCC is pleased that these projects have been identified in the ES Volume 3: Appendix 2.4 – Cumulative Schemes [APP-116], it remains concerned about the cumulative impacts particularly in relation to the approved and proposed energy infrastructure NSIPs in South Norfolk and especially the emerging Tasway Energy Park scheme, which will be in particularly close proximity to the East Pye scheme.	The Applicant discussed the cumulative developments with Norfolk County Council through the scoping opinion, statutory consultation, and subsequent email correspondence. The cumulative developments are agreed as set out in Table 1.4 of ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]. The Applicant has re-provided the correspondence to NCC and the matter will remain under discussion as this is reviewed. The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Drovers Solar Farm and High Grove Solar Farm have been included within the cumulative developments list, as detailed in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP- 058]. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will be submitting a DCO Interrelationship Report into the Examination. With regards to the Tasway Energy Park, the Applicant has sought to assess all cumulate schemes in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. 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.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the Scheme and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance. Depending on the timing of any potential future submission for Tasway Energy Park DCO application, the Applicant may then give consideration to whether it needs to be considered as a cumulative scheme.	

3.4 Landscape and Visual

Table 3.3: Landscape and Visual

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC LV – 1	Methodology and Scope Baseline Appendices and Figures Assessment of Effects	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 2, Appendix 7.2 - Landscape Baseline [APP-119] ES Volume 2, Appendix 7.4 - Visual Baseline [APP-120]	NCC has reviewed ES Chapter 7 [APP-043] alongside the supporting appendices. The LVIA follows industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes.	The methodology adopted within ES Volume 1, - Chapter 7 Landscape and Visual [APP-043] and ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] follow the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). It has been developed through consultation and engagement with stakeholders, alongside a review of relevant guidance and baseline studies. The methodology is based on a robust worst-case approach, reflecting the maximum parameters of the Scheme within the defined works area. The description of the existing baseline landscape and visual conditions set out within ES Volume 2, Appendix 7.2 - Landscape Baseline [APP-119] and ES Volume 2, Appendix 7.4 - Visual Baseline [APP-120] is representative of the baseline site conditions and therefore acceptable to inform the assessment. The assessment is based on accurate baseline data and local landscape planning context, as well as an appropriate landscape and visual survey during winter and late summer. The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with established good practice and is robust and appropriate for the assessment of the Scheme. A worst-case approach has been applied, and the assessment provides a reliable basis for identifying likely significant effects. Embedded mitigation, including design evolution and landscape proposals, has been taken into account within the assessment. The Landscape Assessment provides an appropriate basis for identifying likely significant effects.	Agreed
NCC LV – 2	Baseline Locally valued landscapes	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	The project does not extend into any nationally designated areas in Norfolk, but paragraph 5.10.12 does recognise that there are landscapes which are highly valued locally. The paragraph goes on to say that locally valued landscapes should not be used in themselves to refuse consent. The County Council's	The Applicant considers the design of the Scheme has been informed by an environmentally led approach and has sought to reduce adverse effects on the landscape and its features including those that considered locally valued through considered siting of new features and where appropriate	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			view is that although locally valued landscapes do not require refusal of an application, it would be appropriate for the applicant to take a proactive approach to mitigation and compensation in these areas. The County Council considers that generic approaches such as offset buffers and hedgerow and tree screening are insufficient and that a more tailored approach needs to be taken. A more ambitious approach to mitigation could involve taking advantage of opportunities identified by the local nature recovery strategy and NCC is willing to have discussions with the applicant.	introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. The Applicant considers that where valued aspects are of greater importance development has been limited, such as at Sub-Site 8a, and Sub-Site 4b. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements and the retention of existing vegetation, alongside proposed landscape measures. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. The Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the draft DCO [AS-032]. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [AS-032]. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects	
NCC LV – 3	Scope Temporal and Spatial Scope	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	NCC has reviewed ES Chapter 7 [APP-043] alongside the supporting appendices. The LVIA follows industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes.	The Applicant primarily engaged on the temporal and spatial scope of assessment with South Norfolk Council during the pre-application phase, and agreement was reached with South Norfolk Council on the proposed scope. Norfolk County Council was formally consulted, and no specific concern was raised with the approach to the proposed temporal and spatial scope set out in the PEIR.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The Applicant considers that the spatial and temporal scope defined within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] appropriately captures the extent of potential significant effects on landscape and visual receptors and informs the assessment of landscape and visual effects across the different stages of the Scheme.	
NCC LV – 4	Scope View Location selection	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 2, Figure 7.7 - View Locations and Visualisations [APP-082]	NCC has reviewed ES Chapter 7 [APP-043] alongside the supporting appendices. The LVIA follows industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes.	Norfolk County Council was formal consulted, and no specific concern was raised with the Landscape and Visual view location selection set out in the PEIR. The view locations presented within ES Volume 1, Chapter 7 -Landscape and Visual [APP-043] and ES Volume 2, Figure 7.7 - View Locations and Visualisations [APP-082] are considered to provide an appropriate and robust basis for establishing baseline landscape and visual conditions.	Under Discussion
NCC LV – 5	Scope Landscape Character Assessments	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] ES Volume 2, Figure 7.2 - Landscape Character Plan [APP-067]	NCC has reviewed ES Chapter 7 [APP-043] alongside the supporting appendices. The LVIA follows industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes.	The published landscape character assessments that are relied upon at the national, regional, and local level and set out within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] and ES Volume 2, Figure 7.2 - Landscape Character Plan [APP-067] are considered acceptable to inform the assessment baseline conditions.	Under Discussion
NCC LV – 6	Scheme design Concerns about new overhead lines/pylons as part of grid connection – suggest that grid connection cabling undergrounded and no new pylons.	ES Volume 1, Chapter 4 - The Scheme [APP-040] ES Volume 2, Figure 7.5.10 - Site 1 Zone of Theoretical Visibility [APP-079] ES Volume 2, Appendix 7.7 - Visual Assessment Tables [APP-147]	NCC is concerned the new overhead lines and pylons will have wider visual impact and will have disruption during construction. NCC suggested used of underground cables where possible to connect to the existing 400kV line.	The Applicant has sought to minimise the effect and extent for new overhead cables with siting of the National Grid Substation in close proximity to the existing 400kV line. Grid connection infrastructure will nevertheless be required between the National Grid Substation and the existing 400 kV overhead line (Norwich Main – Bramford). The final design of the substation is ultimately at National Grid's discretion. As such, the Applicant has assessed a reasonable worse case scenario in which the connection from the National Grid substation and the NETS was assessed as using overhead lines, as opposed to underground cables. The Scheme proposes to divert the existing 400 kV overhead line into a newly constructed National Grid Substation. ES Volume 1, Chapter 4 - The Scheme [APP-040] describes the proposed works in relation to the grid connection and proposed pylons.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				A comparative ZTV is produced as part of ES Volume 2, Figure 7.5.10 - Site 1 Zone of Theoretical Visibility [AS-007] . The Applicant considers the visibility of the additional pylon is similar to the baseline. Where the proposed additional pylon has the potential to influence visual amenity, this has been assessed within ES Volume 2, Appendix 7.7 - Visual Assessment Tables [APP-147] .	
NCC LV – 7	Scheme design Favoured national grid Substation option further away from Great Moulton	Site Selection Assessment [APP-215]	The consultee favoured the option with the National Grid Substation further away from Great Moulton.	The Site Selection Assessment [APP-215] explains the rationale for why the National Grid Substation has been located at Site 1b.	Not Agreed
NCC LV – 8	Scheme design Concern about the upgrade of the 132 kV substation south of Great Moulton to 400kV which will have a greater visual impact.	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	The consultee is concerned about the upgrade of the 132 kV substation south of Great Moulton to 400kV which will have a greater visual impact.	The visual effects of the 400kV Project Sub-Station adjacent to the proposed National Grid substation south of Great Moulton has been assessed within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. As set out in the Site Selection Assessment [APP-215], the chosen location for the National Grid Substation avoids major designated areas of ecological or cultural importance, with only limited priority habitats and no heritage assets, County Wildlife Sites or Ancient Woodland present. The National Grid Substation and overhead lines would therefore avoid areas of high amenity, cultural, and scientific value in line with the Holford / Horlock Rules and NPS EN-5. As part of the design evolution, the National Grid Substation was also reorientated north south to enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRow demonstrating that landscape and visual effects have been minimised through iterative design. NPS EN-1 states at para 5.10.5 that ‘<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>’, and at para 5.10.13 that ‘<i>All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>’. Due to the scale of the proposed infrastructure in Site 1, the Applicant identifies change to some of the key characteristics and visual amenity of Site 1	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				however effects would be localised and confined to the Site and its immediate context. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case.	
NCC LV – 9	Cumulative Assessment Concerns about landscape impact taken with Norwich to Tilbury Project	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]	The consultee is concerned about the potential cumulative effects arising from the Scheme and the Norwich to Tilbury Project.	A Cumulative Landscape and Visual Impact Assessment (CLVIA) has been undertaken and is reported within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . The cumulative assessment identifies and considers other consented, and reasonably foreseeable developments that may give rise to cumulative landscape and visual effects when considered alongside the Scheme. The Norwich to Tilbury Project is considered unlikely to interact with landscape and visual receptors in relation to the Scheme due to distance and intervening features and result in cumulative effects and is therefore scoped out.	Under Discussion
NCC LV – 10	Landscape Value—impacts on landscape character, recreational value and experiential change	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]	NCC considers that the experience of recreational users of PRoW and promoted routes may be understated within the LVIA. In particular, NCC is concerned that the assessment does not fully reflect the large-scale and medium to long-term changes that users would experience as a result of the Scheme, including the effects of route closures, alterations to the surrounding landscape character and the influence of proposed mitigation measures. NCC raises concern that the change in landscape character experienced by users travelling along PRoW and promoted routes may be more substantial than reflected in the Applicant's conclusions. NCC emphasises that, for recreational users, effects are not limited to individual viewpoints but relate to the cumulative experience of moving through the landscape. The County Council would like the applicant to: • Clarify how experiential change along the routes has been assessed; and • Consider route specific mitigation measures through planting or landscape enhancements to offset experiential change whilst considering the effect that these measures may have themselves on the experience of the landscape. It is noted	A Public Right of Way (PRoW) Visual Amenity Assessment as a separate assessment to the LVIA, is included in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149] . The assessment relates to the impacts on users of recreational resources comprising PRoW, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. The Outline PRoWPPMP [APP-203] details the proposed paths and connection with existing network and the anticipated closures and management of PRoW. A detailed PRoWPPM will be submitted to and approved by the relevant planning authority in accordance with Requirement 17 of the draft DCO [AS-032] .	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			that with certain PRow the mitigation measures themselves will represent a significant change to the landscape or experience of it and further consideration should be given in these cases. In relation to the timing and effectiveness of mitigation, the County Council requests further clarification on the advanced planting and phasing of landscape mitigation to ensure the prevention of significant effects. Particularly measures to ensure that it is effectively established.		
NCC LV – 11	Landscape Designation	ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]	NCC is concerned that the assessment places significant weight on the absence of formal landscape designations and may therefore underrepresent experiential, perceptual and recreational values. NCC considers that landscapes can be highly valued by communities and users for recreational purposes even where no formal designation exists.	The methodology for the LVIA is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. Table 7.1.2 provides detail on the factors that influence landscape value. Where appropriate to the landscape receptor these factors have been acknowledged in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] and have influenced the overall judgment on value for the receptor. The Applicant considers that existing landscape designations are taken as an indicator for landscape value, however the value of undesignated landscapes is also considered. The assessment has therefore been carried out using the available evidence in a consistent and transparent manner, and the conclusions on landscape value are considered robust and do not underplay the value of the landscape resource.	Under discussion
NCC LV – 12	Landscape Sensitivity	ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121].	The assessment of sensitivity appears to reflect this susceptibility overall. Landscape sensitivity is a key determinant in the assessment of magnitude and significance of effects – where susceptibility is underplayed there is a risk that significant landscape effects also become understated. It is noted that there is a medium to high sensitivity across most of the area and mitigation should ensure that this is adequately addressed. NCC understands that this is a matter of judgement not a methodological concern, but it considers that it is suitable to raise this concern and to ask the applicant to: Provide further justification explaining how the identified susceptibility factors have been weighted in reaching the overall landscape sensitivity judgements;	The methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. This identifies that the assessment of receptor sensitivity combines judgements on the value attributed to the receptor and the 'susceptibility to change' of the receptor to the specific type of development proposed. In general, and in taking a worst case position the higher judgement from either the value or susceptibility to change judgment is considered for the overall sensitivity for the receptor. The factors which have influenced these judgments are set out in ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119], and ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121].	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC LV – 13	Perceptual Qualities	ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120]	Clarify how perceptual qualities such as tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions particularly where any mitigation may itself have an impact on this; and	ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] , defines perceptual qualities for each receptor where appropriate. Where the Scheme or the mitigation proposed could influence these perceptual qualities these have been considered and detailed in ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120] .	Under discussion
NCC LV – 14	Landscape Sensitivity	ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]	Confirm that sensitivity judgements are considering baseline and not including assumptions about mitigation effectiveness	The Applicant confirms that judgements on sensitivity reflect the current and future baseline scenario which does not include the Scheme or its proposed mitigation.	Under discussion
NCC LV – 15	Mitigation measures	Outline LEMP [APP-199]	In response to the above, NCC have requested the Applicant to consider additional mitigation or enhancement measures where effects are identified. The County Council considers that generic approaches such as offset buffers and hedgerow and tree screening are insufficient and that a more tailored approach needs to be taken. A more ambitious approach to mitigation could involve taking advantage of opportunities identified by the local nature recovery strategy and NCC is willing to have discussions with the applicant.	The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. 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. NCC were consulted on the Green Infrastructure Strategy prior to the Application being made and the Applicant welcomes specific feedback on the measures set out. Further measures can be considered and we would welcome specific feedback from NCC on measures they consider are required.	Under Discussion

3.5 Arboriculture

Table 3.4: Arboriculture

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC ARB -1	Arboricultural impacts associated with visibility splays, AIL access requirements and any associated highway works.	Outline CTMP [APP-201] Transport Assessment [APP-174 to 177] Draft DCO [AS-032].	In preparing this response NCC has considered ES Volume 1, Chapter 7 - Landscape & Visual [APP-043] and ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150]. NCC considers that there is insufficient information available to provide a definitive response to the proposals. The County Council's detailed comments are as follows: Section 2.3.12 of the ES Non-Technical Summary [APP-194] states that 'Additional small areas of land throughout the Scheme associated with updates to highway visibility splays have been included' and that 'Additional small areas of land throughout the Scheme to accommodate abnormal indivisible loads ('AIL') that could result in highway works, temporary removal of street furniture and/or vegetation removal, have been included'. NCC is concerned that there does not appear to be any consideration within the ES Volume 3: Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150] of visibility splays, AILs or any highways work required to accommodate an increase in vehicle movements. It also notes that there is no schedule of tree works that quantifies the tree work required for visibility or improvements to the highway. The impacts of tree works and removal on some narrow rural roads could be significant and unacceptable. Should work be proposed to trees and hedges that are not under the control of the project then assurance must be provided that the tree/hedge owners are able to accommodate such work and that there is adequate mitigation in place for any impact. 4.36 It is also noted that the submitted Tree Constraints Plan and Tree Impact Plan included in ES Volume 3: Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] do not have an appropriate overview map or easily navigable base-mapping. Future submissions must have greater clarity	The Applicant notes NCC's concern regarding the potential arboricultural impacts associated with visibility splays, AIL access requirements and any associated highway works. As detailed within the Outline CTMP [APP-201], AIL movements will be managed by specialist haulage contractors and subject to detailed route planning, vehicle tracking and agreed traffic management measures with the relevant authorities prior to movement. The suitability of proposed routes has been assessed through access design, visibility splay assessments and swept-path analysis, as detailed in Appendix C of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. Where required to facilitate the safe movement of AILs, localised highway works and vegetation management may be undertaken, with any such measures identified through detailed design and agreed through the detailed CTMP, which will be secured through the Requirements of the Draft DCO [AS-032]. As part of the Scheme development the Applicant has sought to minimise environmental effects, and in defining AIL routes for the Applicant has considered the suitability of these routes. The Applicant considers that any future works to trees and vegetation to accommodate AIL movements will be limited and as part of the detailing of this due consideration to the arboricultural resource will be given. Should works be required to facilitate AIL movements these will be detailed in the CEMP which is secured through the Outline CEMP [APP-196] and Requirements of the Draft DCO [AS-032]. This will be prepared prior to construction activity commencing and consulted with the Authority. In accordance with the Outline CEMP [APP-196], trees will be retained, where practicable, and will be subject to detailed design and the micro siting of Access Tracks. Where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				life expectancy. Trees with a BS5837:2012 Quality Category of U shall be preferentially removed followed by Category C, B and A trees in that order of priority. Veteran/Ancient trees will not be removed. Furthermore, as defined any tree pruning or works within root protection areas will be subject to supervision by an arboriculturist and working measures defined within an Arboricultural Method Statement to ensure the ensure the longevity of the tree resource is preserved. In relation to the last point, an overview map is shown in the index map at the first page of the submitted Tree Constraints Plan and Tree Impact Plan included in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] that displays the geographical area covered by each sheet within a larger set and the maps can be navigated by searching the tree numbers in the PDF. The drawings will be drawn to a larger drawing scale in future submissions to improve clarity.	

3.6 Ecology and Biodiversity

Table 3.5: Ecology and Biodiversity

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC EB - 1	Environmental Protection	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-043] Outline LEMP [APP-199]	In addition to biodiversity net gain, EN-1 also makes clear that developments may deliver wider environmental gains and benefits, including most pertinently for landscape, the following given in paragraph 4.6.13 of EN-1: • Landscape enhancement; • Increased access to natural greenspace; and • The enhancement, expansion or provision of trees and woodlands. 4.5 Paragraph 5.10.6 of EN-1 requires projects to be designed carefully, with an aim of minimising harm to the landscape, providing reasonable mitigation where possible and appropriate	The Scheme's compliance with EN-1 is set out within the Policy Compliance Document [APP-210] and more generally within the Planning Statement [APP-209] . The Project has been designed carefully with respect to landscape, with embedded mitigation set out in Section 8.8 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] included as part of the design evolution to avoid impacts to important ecological features such as field boundary hedgerow and ditch networks, watercourses and woodlands. Further, the potential for adverse effects during construction, such as damage and pollution, have been avoided and designed out where practicable and will be controlled through the implementation of the Outline CEMP [APP-196] . The Outline LEMP [APP-199] provides the outline strategy for long-term habitat and biodiversity enhancement, management and monitoring across the Project. While the Biodiversity Net Gain Report [APP-218] confirms an improvement in biodiversity across the Site of at least 10%.	Agreed
NCC EB - 2	Protected Sites	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-043]	NCC notes that the applicant states that Fritton Grange Meadows County Wildlife Site ('CWS') and Lower Spring Wood CWS have been assessed and impacts during construction are identified as having Negligible effect which is not significant. This is because the cable route corridor ('CRC') route will use trenchless techniques (a method known as Horizontal Directional Drilling ('HDD') that will go under the CWS to avoid habitat fragmentation, degradation and habitat loss. There will also be buffer zones and standard pollution control measure implemented as per the embedded mitigations section above. The description of Fritton Grange Meadows states that the site consists of a long series of fields, a mixture of tall rank grassland and tall fen vegetation in lower areas. It also contains a number of ponds and an area of game crops. Springs feed into an extensive dyke system and part of the area has recently been planted with conifers, while another	The use of HDD is an established technique used for avoiding impacts to features, including sensitive habitats. For Fritton Grange Meadows CWS the cable will be buried to at least 5m below the surveyed riverbed, while the cables will be fluid free to reduce the risk of leaching of pollutants. Section 2.4 of the Outline Cable Route Construction Statement [APP-216] requires crossings to be supported by a Method Statement which is a requirement of the Outline CEMP [APP-196] . The use of HDD will avoid open cut methods and negate any impacts to the CWS. Further, Section 2.4 of Appendix 7.21 in the Outline Cable Route Construction Statement [APP-216] commits to all works relating to HDD activities being undertaken in line with a Method Statement for each stage of construction of the CRC which is set out in Outline CEMP [APP-196] . The final CEMP will include a break-out contingency procedure to manage any accidental releases of drilling fluid,	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			part is grazed, and the whole site is generally used for shooting. NCC is however concerned that about the impacts of the use of HDD and whether it is suitable for sites with a number of water bodies with both flowing and still with water flowing from these bodies. NCC also notes that the Applicant is using older mapping which may not include newer Roadside Nature Reserves ('RNRs'). Whilst RNRs are not to be impacted by the development or its ancillary works, there are trees and hedges alongside them that may be impacted. The County Council is concerned that any such works should incorporate appropriate measures to mitigate any impacts on RNRs, which should be agreed with the County Council.	including immediate containment and clean-up measures. Construction phase mitigation also requires An Ecological Clerk of Works (EcoW) to oversee works in proximity to watercourses where required, including HDD operations, to ensure protection of aquatic habitats. All RNR's are designated for their remnant grasslands (and associated species abundance), by their very nature, this habitat is low in height, which will pose little risk to highway visibility for Order Limits access and therefore, will not be subject to clearance activities. However, adjacent overgrown hedgerows or overhanging tree canopies within the footprints of the RNR's may require temporary reduction measures during the construction phase, to aid access and visibility splays (which may potentially benefit the RNR ground flora). No other activities are proposed within the RNR's boundaries and where practicable, construction/ decommissioning phase activities (apart from the actual use of the road surface) will implement a 30m buffer surrounding the RNR's. The Outline CEMP [APP-196] sets out measures to ensure run-off control, pollution prevention and construction phase dust impacts will be implemented to avoid impacts to important ecological features which include RNR's.	
NCC EB - 3	Biodiversity Net Gain Assessment	Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219]	NCC notes that the BNG report identifies that the Local Nature Recovery Strategy1 ('LNRS') for Norfolk and Suffolk has not been published. This is not now the case. It has been published and should be taken into account in determining post-development gains.	Whilst the Schemes design evolution has progressed prior to the publication of the LNRS, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the Biodiversity Net Gain Report [APP-218] and Biodiversity Net Gain Statutory Metric [APP-219].	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC EB - 4	Green Lanes	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219] Outline LEMP [APP-199]	Some of the unvegetated PRoW are particularly species rich (informally known as Green Lanes). NCC is concerned that there is potential for impact on these as they are not designated as RNRs are but are ecologically important.	Section 8.8 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] sets out how important ecological features will be protected through the adoption of the mitigation hierarchy. This hierarchy has been adopted throughout the Projects evolution and will be secured during construction by details included in the Outline CEMP [APP-216] . In accordance with ES Volume 1, Chapter 4 – The Scheme [APP- 040] a buffer of 15m will be applied to all PRoW. If construction encroaches within 15m, works will be temporary in nature and affected habitats will be reinstated to their baseline habitat condition. The Biodiversity Net Gain (BNG) Report [APP-218] proposes to retain medium distinctiveness habitat, including grassland (which may include species rich PRoW), which is be set out in the Outline LEMP [APP-199] .	Under Discussion
NCC EB - 5	Protected Species	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment report [APP-156] ES Volume 3, Appendix 8.6 - Bat Activity Survey report [APP-157] ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]	NCC is concerned that Barbastelle bats have had recorded roosts and notably maternity roosts in the woodlands surrounding the site, making it potentially of national importance. There is a potential for direct impacts where the assessment concludes that there is potential minor direct impacts upon these habitats during the construction (and potentially decommissioning phases).	In the Natural England Relevant Representation , Natural England have not commented on the significance attributed to Barbastelle bats which in Table 8.13 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] is confirmed as of National Importance for both roosting and foraging/commuting bats. An understanding of the presence of bats and the distribution of bat roosts, including Barbastelle maternity roosts is included in Tables 3.3 and 3.4 of ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [APP-156] and ES Volume 3, Appendix 8.6 -Bat Activity Survey Report [APP-157] . As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges). To safeguard the species, the Applicant has adopted precautionary measures, through embedded design principles detailed within Design Principles ,	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include the above-mentioned 30m standoff distance from ancient woodlands, at least 15m from non-ancient woodlands, 30-50m pond buffers, and minimum of 10m buffer between hedgerows and ditches/watercourses and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar Solar PV developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree/scrub planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species), thereby contributing towards the species favourable conservation status. The impact assessment in Chapter 8 – Ecology and Biodiversity [APP-044] during construction, operation and decommissioning for both roosting and foraging/commuting bats (Paragraphs 8.9.579 to 8.9.629) identified measures which will be put in place and secured by the Outline CEMP [APP-196], Outline LEMP [APP-199] and the Outline Decommissioning Environmental Management Plan (Outline DEMP) [APP-198], including avoiding works close to woodland, designing out impacts to woodland, trees and hedgerows as much as possible with the establishment of buffers and stand-off distances; avoidance of night time working; adoption of a sympathetic lighting strategy as per Section 4 of ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151] and the implementation of pollution prevention and control measures. The Outline LEMP [APP-199] has incorporated a number of enhancements including the erection of bat boxes to provide artificial roosting opportunities for all species of bats.	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC EB - 6	Protected Species	ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP- 160] ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP- 044]	NCC notes that the white-clawed crayfish Site surveys did not find white-clawed crayfish within the order limits. The ES nevertheless states that appropriate mitigations are required. The absence of signs during a walkover survey cannot be taken to confirm absence. Given the documented vulnerability of white-clawed crayfish to biosecurity failures and the broader catchment context, the County Council considers that construction controls should include robust biosecurity, pollution prevention, and sediment management measures to avoid introducing disease or degrading potential crayfish habitats downstream. The County Council considers that the applicant has not done enough to engage with credible evidence provided by members of the community. The applicant should engage with Norfolk Rivers Trust and the Zoological Society of East Anglia to seek further information on white-clawed crayfish populations in Norfolk.	The Applicant considers that the assessment made for Barbastelle bats and the impacts of the Project have been appropriately mitigated for. ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP- 160] considers impacts to white clawed crayfish are unlikely due to the paucity of records and unsuitability of the habitat. This is further explained in paragraphs 8.9.451 to 8.9.470 of Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Applicant notes the Examining Authority's (ExA) request in respect of White Clawed Crayfish, in the Rule 6 Letter [PD-005]. The Applicant has provided an update on this at Procedural Deadline A within the Applicants Position on White Clawed Crayfish document [PDA-007]. The Applicant acknowledges that the absence of signs during a walkover survey does not, in isolation, confirm absence. However, the survey approach was based on both desk study information and habitat suitability assessment, including consideration of substrate, flow permanence, availability of stable refugia, bank structure, siltation and hydrological connectivity. The assessment identified no records of white-clawed crayfish within the Order Limits, no recent records within a 2 km search radius, and limited habitat suitability within affected watercourses within the Order Limits. The submitted assessment also identified one 2005 record of invasive signal crayfish within a tributary of Hempnall Beck, approximately 1.5 km south-west of Site 3. Signal crayfish (<i>Pacifastacus leniusculus</i>) are a recognised threat to white-clawed crayfish, including through competition and the risk of crayfish plague (<i>Aphanomyces astaci</i>). This provides further context for the conclusion that white-clawed crayfish are unlikely to be present within or immediately adjacent to the surveyed reaches, while reinforcing the need for robust biosecurity controls. Impacts to ordinary water courses have been mitigated by a number of measures set out in the Outline CEMP [APP-196] including the establishment of a 10m buffer, surface water management activities, the avoidance of instream works and use of trenchless crossing techniques, the adoption of good practice techniques and the	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				appointment of both an Environmental and ECoW. Hempnall Beck and the tributary of the River Tas have also been identified as sensitive aquatic receptors and designated as Avoidance Areas within the Scheme design. These watercourses are hydrologically connected to the wider Tas catchment, where historic records of white-clawed crayfish have been identified outside the Order Limits. The avoidance measures secured for these watercourses, including trenchless crossing techniques, stand-off measures and launch and reception pits located outside the sensitive watercourse corridors, are therefore directly relevant to managing potential effects on white-clawed crayfish should the species be present within these watercourses or hydrologically connected downstream habitats. ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] includes the provision of method statements designed to avoid impacts upon aquatic habitats and associated species; these include Method Statement 4: Pollution Prevention Measures, Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology, and Method Statement 11: Specific Measures for Invasive Non-Native Species; which includes commitments to prevent the spread of signal crayfish/crayfish plague. The Applicant is satisfied that these measures combined will avoid or minimise potential effects on instream and bankside habitats used by white-clawed crayfish as well as reduce the likelihood of pollution, sedimentation and biosecurity issues affecting white-clawed crayfish or potential downstream habitat. This approach is considered proportionate because the existing evidence base indicates low habitat suitability within the Order Limits, no evidence of white-clawed crayfish within or immediately adjacent to the surveyed reaches, the presence of signal crayfish within the wider Hempnall Beck system, and secured mitigation for the watercourses where potential impact pathways would be most realistic. Notwithstanding, the Applicant notes the Examining Authority's (ExA) request for further information and potentially for surveys to be carried out for White Clawed Crayfish between July – September, in the	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Rule 6 letter [PD-005]. Currently, no further white-clawed crayfish surveys have been completed in 2026 and no additional surveys are currently proposed within the remaining July to September survey window. This is due to the ongoing drought conditions currently being experienced, which are understood to have resulted in hydrological conditions that are less suitable than those recorded during the original aquatic habitat surveys. Further survey at this time is therefore unlikely to provide a more representative assessment of typical habitat conditions and may further under-represent wetted extent, depth and in-channel habitat availability. The Procedural Deadline A update will explain the survey approach taken, why further survey work is not currently proposed, and why the Applicant considers the existing evidence base and secured mitigation sufficient to inform the assessment of likely effects on white-clawed crayfish. No direct engagement with Norfolk Rivers Trust or the Zoological Society of East Anglia was undertaken as part of the original desk study. The desk study obtained biological records from the Norfolk Biodiversity Information Service (NBIS), Norfolk's Local Environmental Records Centre and principal repository for verified county biological records. Records held by local conservation organisations would ordinarily be expected to be reported to and captured within the NBIS dataset, although the Applicant recognises that this cannot guarantee that every record held separately by those organisations was available to NBIS at the time of the data search. The NBIS data search identified no records of white-clawed crayfish within a 2 km search radius of the Order Limits within the preceding 10 years. Nevertheless, following the County Council's representation, the Applicant has contacted Norfolk Rivers Trust and the Zoological Society of East Anglia to confirm whether they hold any additional, verified and spatially precise white-clawed crayfish records that were not captured within the NBIS dataset used for the submitted assessment. Any additional information received will be reviewed against the submitted assessment, having regard to its provenance, date, location, spatial accuracy and hydrological relevance to the Order Limits. This	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				engagement is intended to confirm that the dataset relied upon remains representative and does not indicate that the submitted habitat assessment or impact conclusions were deficient.	

3.7 Water Environment

Table 3.6: Water Environment

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC WE - 1	Scheme Design Sequential Test/sequential approach to location of infrastructure within Order Limits (points 38, 41, 79 and 80)	ES Volume 1, Chapter 9 – Water Environment [APP-045] ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	From Relevant Representations: 38. The LLFA notes the new responses to the LLFA's comments at the LLFA meeting on 10th December 2025 in relation to the location of the Solar PV Arrays in areas of surface water flood risk. The applicant quoted a selected section of paragraph 027 from the NPPG which identified the need for the flood risk to be identified by the Environment Agency flood risk mapping. The LLFA notes the Risk of flooding from surface water is a map that is produced by the Environment Agency and therefore should be included in the application of the sequential test. The LLFA also notes there is an inconsistency between the definition of the fluvial and coastal flood zones and the surface water AEP extents. For example, flood zone 3 (which includes flood zone 3a and 3b) is land considered to be at high fluvial flood risk with a 1% AEP event, however for the equivalent surface water flood risk for the 1% AEP event the surface water flood risk is considered to be a medium risk. The same inconsistency for flood zone 2 occurs where the land is considered to be at medium fluvial flood risk with between 1% to 0.1% AEP event, however for the equivalent surface water flood risk for between 1% to 0.1% AEP event the surface water flood risk is considered to be a low risk. Therefore, if surface water is to be equally assessed as a constraint to flood risk from rivers and the sea, then medium and low surface water flood risk areas will also need to be included in the constraints assessment in order to match the equivalent flood zones extents given in NPPF. NPPF and EN1 are clear that all sources of flood risk should be considered in both the FRA and the sequential test. In addition, EN1 is clear in paragraph 5.8.7 that <i>'Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk</i>	The Sequential Test has been undertaken for the Order Limits which has included all sources of flooding. Surface water flood risk (low-high) has been considered in equal measure to fluvial flood risk. It is acknowledged that surface water flow routes exist across the Order Limits, however the layout of the Scheme has been developed to provide a 10m buffer from the edge of watercourses and to located infrastructure within areas of flood risk as far as reasonably practicable as set out in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Surface Water Drainage Strategy [APP-162] and secured within the Design Principles, Parameters and Commitments [APP-213]. To meet operational requirements, limited areas of solar panels are located within areas of 'low-high' surface water flood risk, however they are raised on narrow supports and sensitive electrical components of the panels are set at the top of the support which has significant freeboard above ground level. The Design Principles, Parameters and Commitments [APP-213] states that <i>'The lowest edge of the Solar PV Panels will be set at a minimum of 0.4m above ground level. Where Solar PV Panels are situated in areas of 'low' to 'high' surface water flood risk, the Solar PV Panels will be raised higher where practicable, or the use of Single Axis Tracker panels will be considered.'</i> Consideration of the policy requirements of NPS EN-1, the NPPF, and the relevant NPPG is set out within Appendix A – Sequential and Exception Tests of the Planning Statement [APP-209]. A sequential approach has been adopted for the design and layout of the Scheme to minimise flood risk by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			<i>elsewhere and, where possible, by reducing flood risk overall.'</i> As there is no preference to any one source of flood risk, all sources of flood risk are to be considered equally during assessments. The LLFA notes that NPPG paragraph 028 confirms the definition of 'reasonably available' in relation to the assessment of flood risk and states that '<i>alternative sites do not need to be owned by the applicant to be considered 'reasonably available'.</i>' Further work is required. 41. The LLFA notes in section 9.4.1, bullet point 4 the applicant states '<i>analysis of flood extents based on National FRA (NaFRA2) mapping update where detailed Environment Agency hydraulic modelling is not available for smaller tributaries of the Hempnall Beck'</i> The LLFA notes that the Environment Agency Flood Map for Rivers and Sea is a strategic model. The Environment Agency have also prepared a Flood Map for the risk of surface water flooding. While the Environment Agency have reduced the potential for double counting of flood water from the watercourses in the surface water flood map, the method used for modelling surface water flooding highlights flowpaths in relation to topographical geometry, which results in the surface water flood map identifying the potential 3.3% (equivalent of flood zone 3b), 1% (equivalent of flood zone 3a) and 0.1% (equivalent of flood zone 2) flood extents. As ordinary watercourses tend to follow low topographical areas. Therefore, the surface water flood map extents can align with ordinary watercourses that have not been included in the fluvial hydraulic model. Therefore, some surface water hydraulic modelling is available for the smaller tributaries that would indicate an approximate flood extent that could be associated with the watercourses for strategic use. In the FRA, the applicant notes that in Appendix B of the FRA that the Environment Agency confirm that surface water flood mapping has been used to model ordinary watercourses. The LLFA would suggest the applicant has not given due consideration to this available information during the preparation of the Environmental Statement and the majority of the site areas in FRA at this time, as		

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			the FRA only indicates that this consideration has been given to Site 8A. Further work and information is required. 79. In section 7.2.7, the applicant states '<i>Any encroachment into larger areas of higher surface water flood risk areas from these parts of the Scheme is limited to Solar PV Arrays</i>'. This indicates that while the sequential test has been applied, it has focused on one source of flood risk, fluvial flood risk, above other sources of flood risk. However, as previously identified in section 7.2.2, all sources of flood risk should be taken into account. Further work is required. 80. The LLFA notes the improvements in the application of the sequential test that were highlighted in the LLFA's previous PEIR response. The LLFA notes the applicant agrees with the LLFA that the BESS is considered as a Highly Vulnerable class of development. However, the applicant does not go on to state in section 7.1 of the FRA the level of flood risk on the BESS site. Further information is required.		
NCC WE - 2	Scheme Design Access Track Drainage (points 28, 48, 49, 91 and 110)	ES Volume 1, Chapter 9 – Water Environment [APP-045] ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	The LLFA notes that the Applicant has confirmed that haul roads will consist of a Type 1 surface. The LLFA state that whilst access tracks are stated to be permeable, a Type 1 surface is not permeable and with potential compaction due to vehicular movement it is considered that they would not function as a permeable surface. The LLFA has therefore requested more information from the applicant to demonstrate there is adequate space for a surface water drainage system for the access road and that a viable discharge location is identified for each haul road impermeable area. In addition, any improvements or widening of the existing access tracks will also be considered as new development and impermeable areas that require surface water management. At present there is not enough information or evidence available to demonstrate that a viable surface water drainage system is included in the proposed development.	The Applicant notes this comment in relation to the build-up/considered impermeability of access tracks. As set out in the Design Principles, Parameters and Commitments [APP-213], the internal access tracks within the BESS and National Grid Substation will be impermeable. All other access tracks (including the internal access track for the National Grid Substation that will remain in place post-decommissioning of the wider Scheme) are designed to be permeable, however there is a commitment to providing swales or filter drains parallel or downhill of the tracks depending on topography. The Applicant notes the request from the LLFA to provide comfort that there is sufficient space adjacent to the access tracks for their drainage features and further information will be provided at a later deadline to confirm typical sizing and outfall location(s). It is intended to model the swale or filter drain features for one Sub-Site, which can then be replicated across the Scheme at detailed design, and to provide conceptual drawings showing the	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			The swale and filter drain features mentioned would need to be sized appropriately to ensure that there is sufficient space to accommodate them.	route/direction of the drainage features and indicative outfalls to adjacent watercourses.	
NCC WE - 3	Scheme Design Thermal effects from cables (point 55)	ES Volume 1, Chapter 9 – Water Environment [APP-045]	The LLFA notes that in section 9.8.27, the applicant indicates that there is the potential for heat transfer from the cables to the watercourses and the associated receptors. The applicant then goes on to dismiss the potential effects, although no evidence has been provided to support this limited consideration. Therefore, it is not possible for the reader to consider whether an appropriate assessment of this issue raised by the applicant has occurred and whether the magnitude and significance has been assessed accordingly in the ES. Further work and consideration is appropriate.	The Applicant acknowledges that additional evidence may be provided to support the conclusion that thermal effects from buried high-voltage electrical cables are unlikely to result in significant effects on groundwater receptors, including Groundwater Dependent Terrestrial Ecosystems (GWDTEs), peat deposits and other sensitive hydrogeological features. To address this, the Applicant will undertake additional desk-based risk assessment. The Applicant notes that thermal effects will only be relevant during the operational phase, as the cables will not be energised during construction and will be de-energised prior to decommissioning. Any mitigation measures identified through the thermal, hydrogeological or ecological assessments will be incorporated into the detailed cable design and secured through the final Outline OEMP. Where relevant, the Outline CEMP will also be updated to reflect any design or construction requirements arising from the assessment process. This matter was discussed on 1 October 2026. The Applicant confirmed that a Groundwater Heat Pollution Desk Based Assessment has been submitted to the Environment Agency (EA) for review and comment. The Applicant will continue to engage with both the EA and NCC on this matter.	Under Discussion
NCC WE - 4	Scheme Design Ground investigations and infiltration testing (points 68, 86 and 87)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	<u>In their Relevant Representation</u>, the LLFA states that whilst there is more discussion within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] Section 3.3 on geology and hydrogeology across the Order Limits, it does not cover all of the sites and CRCs. The LLFA also notes that ES Volume 1, Chapter 16 – Ground Conditions [APP-052] provides more discussion on hydrology in relation to WFD classifications than in the Flood Risk Assessment and Drainage Strategy.	The Applicant notes that there is more discussion on WFD classifications in ES Volume 1, Chapter 16 Ground Conditions [APP-052], however this is covered further within the ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163]. The Applicant notes the requests from the LLFA to undertake site-specific ground investigations to confirm ground conditions across the Order Limits. Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that groundwater levels	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			The geological information is desk based and no ground investigations to confirm site-specific conditions have been undertaken. The LLFA guidance is also clear that <i>'The LLFA would expect all submitted Drainage Strategies to include an assessment of the suitability of the underlying geology to discharge collected surface water to the ground via infiltration. Information is expected to evidence that infiltration is or is not possible (in the form of testing).'</i> While the LLFA acknowledges the proposed development is in the early design stage, the applicant has had opportunity to access the land within the order limits and it would have been possible to obtain some preliminary infiltration testing results, particularly in key areas of the development such as the substations and BESS sites. The LLFA notes that in section 9.4.11, the applicant has assumed that <i>'infiltration drainage is not feasible'</i> without a suitable evidence base. This section then goes on to state that <i>'Substations within the Sub-Sites will have a piped outfall to a watercourse for the purposes of this assessment in accordance with LLFA requirements.'</i> The LLFA is clear that for a Plan B drainage strategy to be accepted, the location of the discharge point is needed so that it is possible to demonstrate there is a viable surface water management solution including discharge location. Information to demonstrate this has not been provided at this time and therefore the drainage strategy is not in accordance with the LLFA Developer Guidance as stated by the applicant in section 9.2.1. It is not clear whether the data and the assumptions are representative of the conditions on site. Furthermore, there is no information available on the infiltration rates or potential included in the study. As there is no additional information provided in the FRA and Drainage Strategy, it is not possible to determine the accuracy of the assumptions made in both the FRA, Chapter 9 and Chapter 16. It is also unclear why the hydrology information has not been included in the FRA and Drainage Strategy. The LLFA reminds the applicant that in relation to the preparation of the Environmental Statement, the FRA and Drainage Strategy is considered the evidence base for the Environmental Statement.	are significantly below ground (greater than 10m). This information also shows that the majority of the Order Limits is underlain by significant thickness of Lowestoft Formation which is clay. On this basis, it is conservative to assume at this stage that infiltration drainage is unlikely to be feasible across the majority of the Order Limits. The LLFA stated in a meeting on the 18 August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit). The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results. Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design. Further work has been undertaken to firm up the 'Plan B' discharge to watercourse to demonstrate that this is feasible across the Scheme. It is intended to model the swale or filter drain features for one Sub-Site, which can then be replicated across the Scheme at detailed design, and to provide conceptual drawings showing the route/direction of the drainage features and indicative outfalls to adjacent watercourses. For pollution management reasons, it is intended for all Substations to have lined surface water drainage systems with a controlled discharge to QBAR to the nearest ordinary watercourse as set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]. Ordinary watercourses are located in proximity to the 132kV Project Substations within Sub-Sites 4B, 7F and 10C, and the 400kV Project Substation proposed within Sub-Site 5A for surface water disposal as shown on Figure 9.1 Site Location and Watercourses in Appendix A of this report and the site topographic survey which will be used to inform	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			However, that is not possible when the information that the FRA and Drainage Strategy relies on is in the technically focused chapters of the Environmental Statement. Further work, information and clarification is required.	the detailed drainage design (secured through DCO Requirement 11).	
NCC WE - 5	Baseline Consideration of groundwater flood risk (point 72)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	The LLFA noted in their Relevant Representation that in a few areas of the proposed development groundwater flood risk has been identified as a medium risk. There is no discussion within the FRA of the additional assessment work that will be undertaken in these medium risk areas of groundwater flood risk to determine the actual groundwater floor risk. The LLFA have also reviewed Chapter 16 (Ground Conditions) and was not able to find any further information of groundwater flood risk. At present, the FRA which informs the Environmental Statement is not considering the groundwater flood risk in areas identified at a medium risk. This results in the FRA being incomplete for groundwater and inconsistent with the principles of NPPF at this time.	Section 3.2 of ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184] provides the following borehole information in relation to groundwater levels/strikes in the vicinity of the Order Limits: • South-west (CRC2 and Sub-Site 2B): 45.0 metres below ground level (m bgl); • Central west (Sub-Sites 4A, 4B, 5A & 5B): 24.0m bgl at the boundary between the Diamicton and the Chalk • North-east (Sub-Sites 8A/8B & CRCs 10 and 13) 20.0mbgl • East (Sub-Sites 10A-10E): Resting water level of 20.1m bgl Whilst the SFRA mapping shows that certain areas of the Order Limits have a 'low-medium' susceptibility/likelihood of groundwater flooding (as presented in Section 5.6 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162], the above demonstrates that the groundwater table within the area of the Order Limits is at a significant depth below ground, which supports the conclusion that groundwater flood risk in the area (including the Order Limits) is low.	Under Discussion
NCC WE - 6	Baseline EA modelling inconsistencies (point 74)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	<u>Relevant representation:</u> The LLFA notes that in section 5.7.12, the applicant states that 'The EA confirmed that the extents within CRC6 have been included by error, and that the model domain begins north of Mill Lane.' There is no evidence of provided in Appendix B of the FRA to support this statement. The LLFA seek clarification on whether the applicant means Mill Road rather than Mill Lane. Furthermore, on review of the Environment Agency flood mapping for rivers, sea and Surface water, it is notable that if the upstream extent of the Hempnall Beck model is at Mill Road, then the eastern tributary upstream of Mill Road is not modelled by either the fluvial flood map or the surface water flood map. As the 2014 YareTas	The Applicant confirmed in the meeting that road name is Mill Road and that the Hempnall Beck tributaries upstream of this road are set within a steep topographical corridor (as shown on ES Volume 2, Figure 9.2 – Topography and Overland Flows within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] and any flood extents (fluvial or pluvial) are confined within a narrow corridor. The area of Flood Zone 2 and 3 interacting with CRC6 is narrow and the Applicant has committed to trenchless crossings for cables in this area. Commitments have been made with regard to preservation of floodplain storage where CRC6	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			model continues to be in use and publicly published by the Environment Agency (even after the NaFRA2 update in March 2025), it is not clear at this time why this section of the model would be excluded. A precautionary approach would be to continue using this data until further information or evidence is provided.	interacts with Flood Zones 2 and 3 as secured within the Outline CEMP [APP-196], the Outline DEMP [APP-198] and Design Principles, Parameters and Commitments [APP-213]. The same principle would also apply to surface water flood risk and documentation will be updated to extend the commitments to include surface water flood risk at a later deadline. Launch reception pits are located a minimum of 10m away from main rivers, watercourses or ditches (including IDB drains). In terms of location, Flood Zones 2 and 3 will be avoided as far as possible. Where it cannot be avoided, the pits will be backfilled/reinstated following cable installation as secured within the Design Principles, Parameters and Commitments [APP-213]. The Applicant held a meeting with the EA in December 2025 and the EA agreed the above approach and that further detailed modelling for this area of CRC6 was not required. This was confirmed in a meeting with the LLFA on the 1st October 2026 and the Applicant confirmed that a copy of the meeting minutes from this meeting is included in Appendix B of the updated ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018].	
NCC WE - 7	Scheme Design Standalone/inverter drainage approach (point 92)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	The LLFA stated in their Relevant Representation that there is no clear drainage design available to support these features, the evidence provided by the applicant is limited and not supportive toward identifying whether there is infiltration potential and yet the applicant presents infiltration as a viable drainage option for an unknown number of Inverter / Converter Units in unspecified locations. There is also no indication of where the applicant would discharge to the runoff to, should infiltration not be possible.	As set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162], it is intended that even if infiltration is not feasible, the inverter/converter unit attenuation systems will be unlined to allow natural filtration through the aggregate blanket or filter drain base to the strata beneath. The focus is therefore not 'formal infiltration' but percolation and movement through to the strata beneath as occurs in the existing scenario. Section 9.8 specifies an option for a suitable outlet to watercourse as an alternative option and to ensure emptying of the attenuation. The wording provided within Section 9.8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] will be updated at a later deadline for clarity. The detailed design of the Scheme will be informed by ground investigation. The Commitments Register [APP-221] includes commitments (secured	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				by DCO Requirement 13) to undertake ground investigation and states that <i>'The results of the ground investigation will be used to inform the detailed design of the Scheme'</i>. As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] <i>'As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent'</i>. Notwithstanding the above, the Applicant intends to undertake targeted and 'proportionate' ground investigations including infiltration testing during the Examination Period, with further detailed and wider investigations to inform detailed surface water drainage design to follow post consent (if granted), secured by DCO Requirement 11.	
NCC WE - 8	Drainage Design Drainage network model parameters and compliance with LLFA Developer Guidance (point 96)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	<u>Relevant representation:</u> The LLFA raised concerns that a Cv of 1 had not been applied uniformly across all impermeable areas within the InfoDrainage network model.	This comment was discussed with the LLFA at the meeting with the Applicant on 06 July 2026. As discussed, InfoDrainage software has a Preliminary Sizing tool whereby an attenuation feature can be drawn/imported to Plan and the software based on specified parameters (rainfall, return period, storm durations, runoff coefficient etc.) will confirm whether the feature is suitably sized for the given design event. The Dynamic Sizing is similar to the Simulation Wizard in MicroDrainage whereby the whole network is run for specified storm durations and return periods based on specified rainfall data and runoff coefficient parameters. The Dynamic Sizing tool was used to run the model and for all impermeable areas/'Inflows', the runoff coefficient was set to 1 and therefore the network model outputs comply with the LLFA Developer Guidance.	Under Discussion
NCC WE - 9	Scheme Design Preliminary Surface Water Drainage Maintenance Plan (point 98)	ES Volume 1, Chapter 9 – Water Environment [APP-045] ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	The LLFA state in their Relevant Representation that the Preliminary Surface Water Drainage Maintenance Plan is limited as there is insufficient information available to determine what elements of the drainage system will be included in the Scheme and will require maintenance.	The surface water drainage strategy presented within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] is outline at this stage, and therefore the Preliminary maintenance schedule provided is also indicative. This will be refined through the detailed surface	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				water drainage design, which is secured through DCO Requirement 11. In a meeting between the Applicant and the LLFA on the 1st October 2026, the Applicant confirmed that the Preliminary Maintenance schedule appended to the Outline OEMP [APP-197] will be updated to reference compartmentalisation of the BESS aggregate drainage system to allow for isolation, inspection and remediation (if required) of affected areas following a fire incident. ES Volume 3: Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] and the Design Principles, Parameters and Commitments [APP-213] will also be updated to include this commitment. ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] paragraph 9.11.4 states that the BESS may be split into 'compartments' of battery units, each with their own associated lined aggregate sub-base area and separated by lengths of access track. This would aid in the isolating and testing of surface water runoff, and remediation of affected areas following a fire incident. In addition, the following text will be added to the Outline BSMP [APP-200]: 'The automatic and manual isolation systems would be subject to regular operational maintenance to ensure the reliability of the firewater isolation system in a flood event. The detail of this maintenance will be included in the detailed Battery Safety Management Plan once the detailed design of the Proposed Development has been completed.' The Applicant notes the requirement for decontamination of the aggregate substrate drainage layer and impermeable lining of the BESS needs greater clarity. These additional details will be provided within the detailed OEMP at the detailed design stage, including methodology for removal, cleaning and reinstatement of the aggregate such that the impermeable membrane would be maintained and protected from damage and repair if necessary.	
NCC WE - 10	Long-Term Management,	ES Volume 1, Chapter 9 – Water Environment [APP-045]	40. The LLFA notes that in section 9.4.1 the applicant indicates that maintenance appears to occur only in the operation phase. The LLFA	Response to 40	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
	Decommissioning and Resilience (points 40, 57, 70, 104, 116-117)	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	reminds the applicant that maintenance of the temporary facilities in the construction and decommissioning phases is also required. However, this consideration is also not apparent in the information provided in the ES and the various supporting documentations. Further commitments or alteration to existing commitments may be required for maintenance in the construction and decommissioning phases. 57. In section 9.8.54, the applicant has identified there is a potential for 'impacts on groundwater recharge due to increases in impermeable area at the Order Limits, notably for the BESS, Project Substation and National Grid Substation areas (including cabins and transformers)' in the construction and decommissioning phases. It is not clear to the LLFA, from the information provided in this and the subsequent sections, why the impact during the operational phase has not been considered when the structures present would be present. Clarification is requested. 70. In the LLFA notes in section 4.3.3, there is no discussion on the lifetime of the proposed scheme and how that relates to the Peak Rainfall Intensity climate change considerations. Further clarification is required. 104. ODEMP - App 7.3 The LLFA briefly notes that the ODEMP has included the mitigation and monitoring activities for the decommissioning of the National Grid Substation and Grid Connection. However previously in Chapter 4 in section 4.6.4 the applicant has stated that '<i>The National Grid Substation and the Grid Connection Infrastructure would remain in situ.</i>' Therefore, it is not clear to the LLFA whether the National Grid Substation and Grid Connection Infrastructure would remain or be removed as part of the decommissioning activities. Further clarification and information is required. Design Principles, Parameters and Commitments App 7.18 116. In section 4.5.2 b) iv), the applicant identifies the works include the 'laying down of internal access tracks, ramps, bridges, means of access and footpaths'. While in Table 4.5 it is indicated that the	The Applicant notes the LLFA's comment regarding maintenance during construction and decommissioning phases. Maintenance during those phases is addressed within the Outline CEMP [APP-196] and the Outline DEMP [APP-198], secured through Requirements 13 and 21 of the Draft DCO [AS-032]. Response to 57: The Applicant confirms that the impacts of groundwater recharge are considered for all phases of the Scheme as set out in Section 9.8 paragraphs 9.8.54-9.8.57 and Table 9.7 of ES Volume 1, Chapter 9 – Water Environment [APP-045]. Response to 70: The Applicant confirms that the highest Upper End allowance of +45% allowance has been used for the assessment of surface water drainage attenuation requirements as a conservative approach for the NG, Project Substations and BESS regardless of development lifetime in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]. 104: Outline DEMP – EIA-1 The National Grid Substation may be able to provide future capacity for projects once the Scheme is decommissioned, hence the Applicant has not included the removal of this infrastructure as part of decommissioning the Scheme. The Applicant notes that decommissioning measures are provided within the Outline Decommissioning Environmental Management Plan [APP-198] for the National Grid Substation and Grid Connection Infrastructure Table 5.4 and 5.12. The tables will be amended at a later date to remove reference to the decommissioning of this infrastructure. 116-117 – DES-2 The Applicant acknowledges the LLFA's request for clarification. Permanent access to Work Nos. 1 to 7 (which includes Work No. 5) is provided for under Work No. 9B of the Draft Development Consent Order (Revision 2) (Clean) [AS-032], while temporary	

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			Internal Access Track is associated with the Temporary Construction Compound, but it continues to not be clear to the LLFA whether these access features are temporary or permanent. The LLFA requires similar clarification in relation to the 4.5.2 c) i) ee) and 4.5.2 d) ii). Further clarification is required. 117. While in section 4.6.2. b) ii), the applicant identifies the works include the 'laying down of internal access tracks, ramps, ramps, footpaths, roads, including the laying and construction of drainage infrastructure, signage and information boards'. While in Table 4.6 it is indicated the Internal Access Track will be constructed. However, it is not clear to the LLFA whether these access features are proposed to be temporary or permanent. Further clarification is required.	construction, maintenance and decommissioning access is provided for under Work No. 9A.	
NCC WE - 11	Watercourses, Crossings and Water Environment Protection (points 43, 45, 56, 82-83, 123)	ES Volume 1, Chapter 9 – Water Environment [APP-045] ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162]	NCC has concerns regarding potential impacts on watercourses, floodplain processes and the wider water environment. Outstanding matters include the design of watercourse crossings, HDD works and breakout risks, treatment of ordinary watercourses, management of pollution and spills, groundwater protection measures and the adequacy of embedded mitigation. NCC seeks further assessment and mitigation to demonstrate that impacts on water resources and water quality will be appropriately controlled. On review of the OOEMP, the focus of the management measures is on the prevention of contaminates entering watercourses however, there appears to be a lack of discussion on what measures would be used to prevent the contamination of groundwater or whether these have already been mitigated with the proposed drainage design. Clarification is required. It is also noted that there is no discussion on the potential for breakouts associated with HDD and the potential effects on the watercourses should such an incident occur. The LLFA have only been able to find one mention of this risk in the OCEMP that states 'a breakout contingency procedure will be included in the detailed CEMP(s) to manage any accidental releases of drilling fluid'. There is no consideration of this risk in either the Environmental Statement or the FRA and Drainage Strategy. Further information is required.	Response to 43: The Applicant notes this comment. Whilst specific reference to the Starston Brook may have been omitted from ES Volume 1, Chapter 9 – Water Environment [APP-045] paragraph 9.6.2, the receptor is identified within Table 9.4 and the chapter assesses impacts in relation to this receptor, which concludes that the residual effects are 'Not Significant' with the exception of the cessation of agricultural/fertiliser use where the impact has been assessed as Significant Major Beneficial. Response to 45: The Applicant notes this comment. Given the large size of and variable flood risk across the Order Limits it was considered that a summary would be lengthy and run the risk of inconsistencies between Chapter and accompanying appendix, and therefore there is instead a cross reference. All the necessary information is available for review either within the ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] or ES Volume 1, Chapter 9 – Water Environment [APP-045]. Response to 56: The Applicant notes the LLFA's request for clarification on mitigation measures for groundwater contamination. The assessment of effects on the water environment, including groundwater, is set out	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				in ES Volume 1, Chapter 9 – Water Environment [APP-045]. As stated in the Outline OEMP [APP-197] Table 4.4, in relation to the National Grid Substation, fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers), therefore any pollution from these areas arising from leaks/spills would be contained and would not interact with groundwater bodies. The OEMP will be updated in due course to ensure this commitment applies to all other substations (and (BESS) compounds within the scheme. Response to 83: The approach to Avoidance Areas is set out in the Outline Cable Route Construction Statement [APP-216] and Outline CEMP [APP-196]. Avoidance Areas are also depicted on ES Volume 2, Figure 4.3 Key Construction Phase Features [APP-061]. As noted in the LLFA representation, the Outline CEMP [APP-196] states that a breakout contingency procedure will be included in the detailed CEMP(s) to manage any accidental releases of drilling fluid. The Outline CEMP [APP-196] is secured through Requirement 13. Detailed management plans will be submitted to and approved by the relevant planning authority. ES Volume 1, Chapter 9 – Water Environment [APP-045] has considered the embedded mitigation measures secured through the outline management plans. Response to 123 - ordinary watercourse crossings (DPPC) -DES-2 The Applicant notes the LLFA's request for clarification on the works described in Section 4.11.2(a)(i) of the Design Principles, Parameters and Commitments [APP-213]. The Applicant draws attention to the commitments already secured in Table 4.7 of the Design Principles, Parameters and Commitments [APP-213] for watercourse crossings within the Sites, which identify a hierarchy of crossing forms in order of least to most impact: single-span structures that do not interfere with the channel; span structures with in-stream supports or	

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				pre-cast structures with natural bed; closed culverts with artificial invert; and open trench with over-pumping. The specific design of any crossing structures required to support permissive paths across ordinary watercourses is a matter for the detailed design stage and will be informed by the outline drainage strategy in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018 and AS-019], which concludes that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. The detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority in consultation with the LLFA under Requirement 11 of the Draft DCO[AS-032]. Another meeting to discuss this matter has been scheduled with the LLFA, and this matter will remain under discussion until Deadline 3.	

3.8 Cultural Heritage

Table 3.7: Cultural Heritage

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC CH – 1	Archaeological Mitigation Strategy	ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]	NCC is broadly in agreement with ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173] ; however, there are broad differences regarding: - The need to have some level of testing by trial trenching of all areas of the Scheme not previously trenched; and - The cumulative level of impact of piling and cabling for the solar arrays.	The Applicant welcomes NCC's broad agreement with the outline mitigation strategies included within ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] . NCC's comments regarding trial trenching as well as piling and cabling for the Solar PV Arrays have been addressed in further detail in NCC CH – 2 – NCC CH - 4.	Under Discussion
NCC CH – 2	Additional Mitigation	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 1, Chapter 10 – Archaeological Geophysical Survey [AS-022] ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [APP-172] ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]	NCC states that trenching to-date has focussed on targeting high potential areas identified by the geophysical survey, and there has been an insufficient level of trenching across the whole Scheme, including so-called 'blank' areas.	The Archaeological Mitigation Strategy (AMS) ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] includes a commitment by the Applicant to undertake further trenching in so-called 'blank' areas identified by the geophysical survey. However, the amount and location of further trenching will be targeted in areas of higher impact (3.5% in the locations of substations, BESS and working compounds) and will be proportionate to the cumulative impact of all elements of the Scheme. The trench plan will be agreed with NCC following final detailed design.	Under Discussion
NCC CH – 3	Impacts resulting from Piling	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 - AS-021] ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] Design Principles, Parameters and Commitments [APP-213]	NCC note that at present, there are no details for the piling associated with the PV arrays and, therefore, the cumulative impact of the piling is not known. Any assessment of impacts of cabling on below-ground [archaeological remains] is highly uncertain and provisional. Potential impacts on below-ground archaeological remains from piling for PV panel mounting structures are not negligible. The cumulative impact of piling will have an adverse impact on below-ground archaeological remains. The magnitude of impact is in part dependant on the nature of the below-ground archaeological remains. The removal of piles will have a destructive effect on below-ground archaeological remains that will need to be mitigated at pre-construction stage.	The Applicant notes that some details regarding depth of piled mounting structures have been included within Design Principles, Parameters and Commitments [APP-213] . However, it is acknowledged that the full arrangement of the Solar PV Array piles will not be available until the final detailed design is produced. Based upon the nature of archaeological remains identified thus far within the Order Limits, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 - AS-021] , ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] , ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] , and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] , the impact from piling alone, given the small size of individual piles and the spacing between each pile, would not compromise the integrity of the archaeological features, nor the ability to understand the 'archaeological site' should	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
		ES Chapter 1, Volume 19 – In-Combination Effects Assessment [APP-055]		future archaeological investigation take place. It should also be noted that predicted impact of piling of 0.1% to 0.05% (which is calculated on the basis of double pile width to allow for disturbance from removal) is not an impact upon archaeology but the total below ground impact of the piling. Therefore, the majority of the piles are not likely to impact archaeology at all. It is for these reasons that the impact of piling for the solar arrays has been assessed as negligible. The Applicant notes that the impact of piling will be mitigated prior to the Construction Phase of works beginning. Paragraph 3.7 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] allows for trial trenching of all areas of impact of the Scheme at a level to be agreed with NCC that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling). Paragraph 3.11 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] notes that where fieldwork identifies any archaeological features which may need to be avoided, this would require either the adjustment of the pile layout and/or the targeted use of concrete feet to support the panel mounting structures. Areas of potential decommissioning impacts during the removal of infrastructure in general will be safeguarded and potentially mitigated in accordance with section 11 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. ES Chapter 1, Volume 19 – In-Combination Effects Assessment [APP-055] includes an assessment of in combination effects, including the effects on below-ground archaeology.	
NCC CH - 4	Impacts resulting from Cabling	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] Design Principles, Parameters and Commitments [APP-213]	NCC note that at present, there are no details for the cabling associated with the PV arrays and, therefore, the cumulative impact of the cabling is not known. Any assessment of impacts of cabling on below-ground [archaeological remains] is highly uncertain and provisional. The cumulative impact of cabling will have an adverse impact on below-ground archaeological remains; the magnitude of impact is, in part,	The Applicant notes that some details regarding electrical cabling have been included within Design Principles, Parameters and Commitments [APP-213]. However, it is acknowledged that the full arrangement of the Solar PV Array, including cabling routes/trenches, will not be available until the final detailed design is produced. While it is acknowledged within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], that full details of the amount and location of associated	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
		ES Chapter 1, Volume 19 – In-Combination Effects Assessment [APP-055]	dependant on the nature of the below-ground archaeological remains.	cabling is not yet available, it is recognised that during the Construction and Decommissioning Phases of the Scheme, relatively low levels of below-ground disturbance are expected, depending upon the exact layout and construction methods being utilised (typically in the region of 5% - 7% of site area). The Applicant notes that the impact of cabling will be mitigated prior to the Construction Phase of works beginning. Paragraph 3.7 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] allows for trial trenching of all areas of impact of the Scheme at a level to be agreed with NCC that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of cabling). Paragraph 3.12 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] states that the option for localised areas of above-ground cabling to preserve significant archaeological remains <i>in situ</i> where it is not practicable or desirable to mitigate by archaeological excavation will be available. Areas of potential decommissioning impacts during the removal of infrastructure in general will be safeguarded and potentially mitigated in accordance with section 11 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. ES Chapter 1, Volume 19 – In-Combination Effects Assessment [APP-055] includes an assessment of in combination effects, including the effects on below-ground archaeology.	

3.9 Transport and Access

Table 3.8: Transport and Access

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC TA - 1	HDD HDD Methodology	Outline Cable Route Construction Statement [APP-216]	No new / enhanced access is to be located on the A140 and Horizontal Directional Drilling will be required under the A140.	It has been agreed that trenchless crossing techniques such as HDD will be used on A140 (and B1527). Further information can be found in the Outline Cable Route Construction Statement [APP-216] .	Under discussion
NCC TA - 2	General Sites 7 to 10 General	Transport Assessment [APP-174]	While there have been extensive discussions regarding Sites 7–10 (north of the B1527), the highway authority considers that the current proposed transport strategy does not adequately address the significant highway constraints, nor provide sufficient mitigation. As a result, the current strategy cannot be supported.	The Applicant wishes to continue the constructive dialogue with NCC highways officers to seek to reach agreement on an access strategy that can be supported.	Under discussion
NCC TA - 3	Site Access Sites 1 and 2	Outline Construction Traffic Management Plan [APP-201] Transport Assessment [APP-174] Outline Cable Route Construction Statement [APP-216] Design Approach Document [APP-212]	Sites 1A to 2C - As per the initial comments at the Preliminary Environmental Impact Report (PEIR) stage, there should be only one access located on B1134 Station Road and all vehicles are to use CRC2 and CRC3 to access the individual sites. Haul route crossing facilities should be used to cross Lodge Road and Frith Way.	Two accesses are proposed on B1134 Station Road to accommodate access to the BESS Site and Sub-Sites 1A-D. Two accesses are proposed to facilitate access to different land parcels and provide flexibility during construction where (subject to the final construction programme) works in different sites could potentially occur at different times. In addition, the following points are noted by the Applicant: - The highway crossing point for CRC2 on Frith Way is in close proximity to a roadside nature reserve located on the east of the crossing point on the north side of Lodge Road. In addition, a Great Crested Newt pond is located to the south of Frith Way/Lodge Road opposite the roadside nature reserve. On the basis of these constraints, it was considered less impactful to use the existing access in the layby on A140 rather than use CRC2 as a haul route to access Sub-Site 2B. - An avoidance area bisecting CRC3 (CRC3A) has been included due to the presence of trees, hedgerows, ditches and overhead lines along Carpenter's Walk. Carpenters Walk is also a private road and a PRow. This is shown in Appendix A, Sheet 17 of the Outline Cable Route Construction Statement [APP-216] and detailed in Table 2.1, Page 7 of the Outline Cable Route Construction Statement [APP-216]. The avoidance of ditches is highlighted as a consideration relating to the cable route corridor	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				on Page 65 of the Design Approach Document [APP-212]. As a result of this combination of factors, CRC3 is not considered feasible for use as a haul route between Sub-Site 2A and 2B. - Sub-Sites 2A and 2B have an existing access within a layby (northbound) on the A140. It is proposed that during construction each layby is closed to general traffic and only accessible to works vehicles with appropriate signage installed. This is considered to be the safest approach. Overlap between the closure of each layby would be kept to a minimum. - As stated in meeting minutes with NCC dated 15 October 2024 (detailed in Appendix E of ES Volume 3, Appendix 11.1 - Transport Assessment (Part 4) [APP-177]), it was raised by the Applicant if there would be any challenges with sites in the south-west (Site 2) accessing directly from A140. It was noted by NCC that this would be feasible, however the access point would need to be considered carefully alongside appropriate traffic management. It was also noted by NCC that the QE2 hospital scheme has agreed to left-in / left-out movements only for direct access onto A140. Left-in / left-out movements are proposed for site accesses on A140, alongside additional management and mitigation measures as detailed in Chapter 7 of the Outline CTMP [APP-201].	
NCC TA - 4	Sites 1 and 2	N/A	Access A03 should be removed for construction and for all associated traffic, however, we would not have any issues with this being used for the BESS emergency access.	The Applicant notes the comment and will consider changing the status of the Access to operation only including BESS emergency access.	Under discussion
NCC TA - 5	Sites 1 and 2	Transport Assessment [APP-174] Outline CTMP [APP-201]	Access A04, being a proposed highway crossover, is considered acceptable in principle. However, it would still be subject to appropriate visibility standards, maintenance of verge conditions, and any necessary traffic management measures during construction.	The Applicant notes the comment and confirms Access A04 will conform to visibility standard, verge protection and traffic management measures during construction subject to detailed design. Site access design, visibility splays and swept-path analysis, including for A04, is appended to ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177] . In addition, traffic management measures are detailed in the Outline CTMP [APP-201] , which include pre and post construction road condition surveys.	Under discussion
NCC TA - 6	Sites 1 and 2	Outline CTMP [APP-201]	Access A05 is acceptable as a haul crossing and for maintenance only.	Access A05 is not proposed to be utilised for the operational maintenance phase. The access has	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				been proposed as a highway access and crossing point to accommodate the construction of CRC2, as well as provide flexibility should access to Sub-Site 2B be required.	
NCC TA - 7	Sites 1 and 2	Outline CTMP [APP-201]	Access A06 should be removed entirely, with all vehicle movements instead routed internally via CRC2 and access A05 between the BESS site and Site 2B.	Access A06 was included to provide flexibility for construction access to CRC2 subject to final design and sequencing of works associated with the BESS. The Applicant will continue dialogue with the Consultee regarding this access point.	Under discussion
NCC TA - 8	Sites 1 and 2	Outline PRow and Permissive Paths Management Plan [APP-203]	There are a significant number of Public Rights of Way (PRow) and bridleways within Sites 1A to 1C, the BESS area, and along CRC1. Clarification is required on the mitigation measures proposed to manage interactions between construction traffic and these routes. It is also important to confirm whether these proposals have been discussed and agreed in principle with the PRow Officer.	The Applicant has engaged with NCC's PRow officer, and meeting minutes are detailed in Appendix A of the Outline PRow and Permissive Paths Management Plan (Outline PRowPMP) [APP-203] alongside the proposed management and mitigation measures. These measures have been designed to manage the interaction between construction vehicles and the PRow network and mitigate effects on PRow users. Despite repeated attempts NCC PRow officers have not yet responded to requests for further engagement.	Under discussion
NCC TA – 9	Sites 1 and 2	Transport Assessment [APP-174 to 177]	The highway authority has been clear no new / enhanced access should be located on the A140.	The Applicant has provided justification for the proposed access strategy to Site 2 (see NCC TA-3), which makes use of existing accesses and laybys alongside left-in/left-out only restrictions for construction vehicle movements. In addition, in a meeting with NCC dated 15 October 2024 (see meeting minutes appended to Transport Assessment [APP-174 to 177]), it was discussed if there would be challenges with Site 2 accessing from A140. It was stated by NCC that 'this would be feasible, however the access point would need to be considered carefully and appropriate traffic management must be proposed.' It was added by NCC that 'QE2 hospital has agreed to left-in/left-out movements only for direct access onto A140.'	Under discussion
NCC TA – 10	Sites 1 and 2	Transport Assessment [APP-174 to 177] Outline CTMP [APP-201]	Access A09, the temporary HDD compound should be accessed via access A11 located on Wood Lane (U76019).	The Applicant acknowledges this comment and the access on Wood Lane. The proposed access to the temporary CRC compound via access A09 on A140 is considered to cause the least impact, due to the presence of residential and commercial properties along Wood Lane. Traffic management measures, as detailed within the Outline CTMP [APP-201] include restricting movements on A140 to left-in/left-out only.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC TA - 11	Sites 1 and 2	Transport Assessment [APP-174 to 177]	Site 2B should be accessed via CRC2 between the BESS site and Site 2A and Site 2C should be accessed via CRC3.	See responses NCC TA-3 and NCC TA-9.	Under discussion
NCC TA - 12	Site Access Site 3	Outline Cable Route Construction Statement [APP-216] Design Approach Document [APP-212] Transport Assessment [APP-174 to 177]	Sites 3A and 3B - These should only be accessed either via Site 5B, utilising CRC6 and CRC5 or a new access on Alburgh Road connecting to CRC6.	Site 3A has been removed from the Scheme, retaining just Site 3B (now referred to as Site 3). One access is proposed to Site 3 on Alburgh Road, utilising an existing site access. Access to Site 3 via CRC6 is challenging due to ecological constraints and the use of trenchless crossing techniques. Two avoidance areas along CRC6 restrict its feasibility to be utilised as a haul route: • CRC6B: Relates to avoiding the removal of trees and hedges located in an established mature tree line that connect to established woodland blocks to the west and east of the tree line; and • CRC6C: Relates to the presence of a watercourse (Hemphall Beck), hedgerows and woodland. Avoids significant aquatic, hydrology and drainage impacts. The two avoidance areas CRC6B and CRC6C are shown in Appendix A, Sheet 11, of the Outline Cable Route Construction Statement[APP-216]. Information regarding avoidance areas is also detailed in Table 2.1, Page 6 of the Outline Cable Route Construction Statement [APP-216]. CRC6 in close proximity to Site 3 crosses a field and tree line that contains several high value veteran trees. To reduce impact the CRC width will be kept to a minimum when passing the veteran trees. This restricts this section of CRC6 being used as a haul route. In addition, the field boundary between CRC6 and Site 3 contains hedges and trees that provide connectivity to the county wildlife site and ancient woodland located further to the east. Minimising impact at this location aligns with the broad design principles set out in Table 3.1, Page 41 of the Design Approach Document: [APP-212]. Considerations relating to the cable route corridor are also detailed on Page 65 of the Design Approach Document: [APP-212]. Due to the ecological and environmental constraints with regards to utilising CRC6 as a haul route, the proposed access to Site 3 via Alburgh Road is considered to be the most suitable. The forecast	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				peak daily trip generation to Site 3 (see penultimate column) is also not considered to cause a significant impact, resulting in a 3.34% increase on future baseline flows, as detailed in Table 9.2, Page 36 of the Transport Assessment [APP-174 to 177] .	
NCC TA - 13	Site 3	Transport Assessment [APP-174 to 177] ES Volume 1, Chapter 11 - Transport and Access [APP-047]	Access should still utilise CRC6, however access A34 would be acceptable with the existing highway network and small construction traffic predicted. No vehicular use of Lundy Green could be supported.	Due to the ecological and environmental constraints with regards to utilising CRC6 (see NCC TA-12), the access via Alburgh Road is considered the most suitable. The peak daily trip generation to Site 3 is 3 HGVs and 11 cars / shuttles / LGVs, as detailed in the Transport Assessment [APP-174 to 177] and ES Volume 1, Chapter 11 - Transport and Access [APP-047] . This is considered to be low in traffic volume, does not exceed IEMA Guidance thresholds, and is also representative of the peak daily estimate and therefore a reasonable worst-case scenario. Lundy Green is not proposed to be utilised for the construction or operation of the Scheme.	Under discussion
NCC TA - 14	Site Access Site 4	Transport Assessment [APP-174 to 177]	Sites 4A and 4B - Sites 4A should be accessed from the A140 Hempnall Roundabout. Site 4B should use a single access point on the B1527 Hempnall Road or alternatively via CRC6.	The Consultee's position aligns with the current access strategy i.e. access to Sub-Site 4A is proposed via the existing access on Hempnall Roundabout, access to Sub-Site 4B via a single existing access on B1527. Sub-Site 4B also connects to CRC4 in the south east corner of the site. Construction routeing information can be found in the Transport Assessment [APP-174 to 177] .	Under discussion
NCC TA - 15	Site Access Site 5	Transport Assessment [APP-174 to 177]	Sites 5A and 5B - Both sites should be served from a single access on the B1527, with internal routing between the parcels.	There are three proposed site accesses for Sites 5 – two on B1527 for 5A and one on The Street for 5B. Access A23 on the B1527 is a new access and is needed to accommodate AIL movements associated with the substation located in Site 5A. Where possible construction vehicle movements will be internalised between 5A and 5B. The three proposed accesses allow for flexibility during construction where (subject to the final construction programme) works in the different Sites could potentially occur at different times. Access A25 will also be used for accessing CRC6. Information regarding AIL movements is detailed in the Transport Assessment [APP-174 to 177] .	Under discussion
NCC TA – 16	Site Access Site 5	Transport Assessment [APP-174 to 177]	There should not be two accesses on the B1527 for these sites. Either Access A23 or A24 should be used for AILs and all construction traffic. In addition, there are two bridges (TM29302 and TM29303) along this route; it should be confirmed with the NCC	Access A06 was included to provide flexibility for access to Sub-Site 5A subject to final design and sequencing of works associated with the Sub-Site and substation. The Applicant will continue dialogue with the Consultee regarding this access point.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			structural team that these can accommodate ALL movements.		
NCC TA – 17	Site Access Site 5	Transport Assessment [APP-174 to 177]	There is no need for both Accesses A25 and A26 to be located on The Street as currently proposed. Access A25 should be relocated opposite Access A26 to facilitate the temporary haul route crossing and all maintenance vehicles should then access the site via either A23 or A24 as per comment above.	Access A25 and A26 are both required to access Sub-Site 5B. Both are existing field accesses and using them avoids having to create a field boundary crossing point through an existing hedgerow therefore avoiding ecology impacts.	Under discussion
NCC TA - 18	Site Access Site 5	Outline PRow and Permissive Paths Management Plan [APP-203]	There are a significant number of Public Rights of Way (PRowS) and bridleways within Sites 5A and 5B. Clarification is required on the proposed mitigation measures to manage interactions between construction traffic and these routes. It should also be confirmed whether these proposals have been discussed and agreed in principle with the PRow Officer.	The Applicant has engaged with NCC's PRow officer, and meeting minutes are detailed in Appendix A of the Outline PRowPMP [APP-203] alongside the proposed management and mitigation measures. These measures have been designed to manage the interaction between construction vehicles and the PRow network and mitigate effects on PRow users. Despite repeated attempts NCC PRow officers have not yet responded to requests for further engagement.	Under discussion
NCC TA - 19	Site Access Site 6	Transport Assessment [APP-174 to 177]	Site 6 - Access from Alburgh Road is acceptable.	The Consultee's position aligns with the current access strategy as detailed in the Transport Assessment [APP-174 to 177] .	Under discussion
NCC TA - 20	Site 6	Transport Assessment [APP-174 to 177] Outline CTMP [APP-201]	The access strategy for Site 6 is broadly acceptable. However, the clarity is required on the proposed access and CRC route arrangements, with the aim of reducing the number of access points required in this area. Accesses A35, A36, A37 and A38 should therefore be consolidated into as few access locations.	The access locations within the vicinity of Site 6 are as follows (also refer to the Access and Public Rights of Way Plan [APP-011]): - A35: is a highway access for construction and operation, providing access to Site 6; - A36: is a crossing point only, for the construction of the CRC; - A37: is a highway and crossing point for the construction phase only, for the construction of the CRC and provision of highway access to CRC8; - A38: is a highway access for the construction phase only, for the provision of access to CRC8 and the CRC construction compound. The accesses list are considered necessary for the safe and efficient construction of the Scheme. The Applicant notes that the construction phase is temporary in nature and only one access (A35) is proposed to be retained for the operational phase.	Under discussion
NCC TA - 21	Site Access Sites 7, 8 and 9	Outline Cable Route Construction Statement: [APP-216]	Sites 7A to 7K, 8A to 8B and 9 - All sites should be accessed via CRC8, west of Hempnall, with internal haul routes or CRC connections to each individual site.	Several avoidance areas are located along CRC8: CRC8A: Relates to avoiding the removal of trees and hedges located in an established mature tree	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
		Transport Assessment [APP-174 to 177] Outline CTMP [APP-201]		belt that is part of the field boundary to Sub-Site 7K; • CRC8B: Relates to avoiding the removal of trees and hedges located in an established mature tree line that connects two SSSI's and ancient woodland blocks (Little Wood and Winter's Grove) located to the east and west of the tree line; and • CRC8C: Relates to avoiding a watercourse (tributary of Hempnall Beck), hedgerows and trees. Avoids significant aquatic, hydrology and drainage impacts. The locations of these avoidance areas are shown in Appendix A, Sheet 8 of the Outline Cable Route Construction Statement [APP-216], and detailed in Table 2.1, Page 6 of the Outline Cable Route Construction Statement [APP-216]. Given the locations of the avoidance areas along CRC8, it is not proposed for this cable route section to be utilised as a haul route between Sites 7A-K, 8A-B and 9. Additional factors have also impacted the suitability of utilising CRC8 as a haul route. This includes potential constraints arising from the sequencing of the construction programme, and sites not being active simultaneously to facilitate access via a CRC8 haul route. The use of internal haul routes between sites has been proposed for Sites 7A-F, Sites 7G-L and Sites 8A-B. The Applicant has discussed the access strategy for these sites extensively and has sought to internalise vehicle movements along CRC and interconnecting sites wherever practicable as set out in the Technical Notes appended to the Transport Assessment [APP-174 to 177]. Due to the ecological and environmental constraints with regards to utilising CRC8 as a haul route, the proposed access routes and use of existing access points as set out in the Outline CTMP [APP-201] as considered the most suitable, alongside the proposed management and mitigation measures, also set out in the Outline CTMP [APP-201].	
NCC TA - 22	Sites 7, 8 and 9	Transport Assessment [APP-174 to 177]	The proposals continue to identify The Krons as the primary construction access route. From a highway	The use of The Krons for access to Sub-Sites 7A-F was developed following consultation feedback with	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			perspective, use of The Krons is considered unacceptable for HGV movements.	NCC (meeting minutes are appended to the Transport Assessment [APP-174 to 177]): - In a meeting with NCC dated 22 July 2025, it was noted by NCC that there were concerns with the initial access strategy via the A140 / Fairstead Lane junction - In a meeting with NCC dated 26 November 2025, the Applicant made note that the creation of an internal haul route along CRC7 was not feasible due to constraints including Hempnall Beck river, a country wildlife site and other ecology constraints. It was added that trenchless construction methods are proposed for constructing the cable route for this section - In a meeting with NCC dated 9 December 2025, NCC raised concerns along Fairstead Lane, identifying a potential for access via B1527, The Krons, and Fairstead Lane instead of using the A140 / Fairstead Lane junction. It was noted by NCC in this meeting that 'technical highways reasoning for using The Krons rather than the A140 / Fairstead Lane option made it a better option for construction access'. Following this meeting, the Applicant undertook a further assessment of The Krons route feasibility, and this was shared with NCC in a meeting dated 7 January 2026 The Applicant's proposal to utilise The Krons for access to Sub-Sites 7A-F has been developed following direct feedback from NCC's highways team, recommending this as a preferable route over using the A140 / Fairstead Lane junction.	
NCC TA - 23	Sites 7, 8 and 9	Transport Assessment [APP-174 to 177]	Fairstead Lane west with its junction with the A140 is still showing within the red line boundary. It was previously understood that this route, particularly from the A140 end, was no longer being considered suitable for general construction.	The Applicant notes that the A140 / Fairstead Lane junction route is no longer proposed as an access to Sub-Sites 7A-F, however the boundary has been retained for flexibility should further assessment be required to be undertaken.	Under discussion
NCC TA – 24	Sites 7, 8 and 9	Outline Cable Route Construction Statement: [APP-216] Transport Assessment [APP-174 to 177] Outline CTMP [APP-201]	Whilst we appreciate that internal haul routes have been used between Sites 7A-K, 8A-B and 9. It is felt that CRC8, 9, 10 and 13 should be used more to accommodate the construction traffic.	The Applicant notes the comment and confirms that due to the inclusion of avoidance areas along CRC8, 9, 10 and 13 as shown in the Outline Cable Route Construction Statement [APP-216] , trenchless construction methods are proposed at various locations. This is due to the high ecological impact of providing a haul route along these CRC compared to using the available Local Road Network. For example CRC9B avoidance area relates to the	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				crossing of Lower Spring Wood County Wildlife Site, woodland and veteran hedgerows.	
NCC TA - 25	Sites 7, 8 and 9	Outline Cable Route Construction Statement: [APP-216] Transport Assessment [APP-174 to 177] Outline CTMP: [APP-201]	One comment you have raised why you cannot use CRC8, 9, 10 and 13 is the sequencing of the construction programme. The highway authority feels this is not justification to not consider our comments and programme can be adjusted to make sure the CRC / sites are built simultaneously.	The Applicant has provided details for the design of the proposed internal haul route on CRC8 in NCC TA-21 and NCC TA-24. The sequencing of construction activities across the program must consider factors in addition to transport, such as staff resourcing, delivery specifications, and input from contractors. Therefore, the Applicant considers the construction sequencing forms a reasonable justification for the proposed approach to site access and routeing, in addition to other constraints regarding the CRC raised previously.	Under discussion
NCC TA - 26	Site Access Site 10	Transport Assessment [APP-174 to 177]	Sites 10A–10D should share a single access on Harvey Lane, with internal haul routes between parcels. Site 10E should be accessed via CRC14.	There are three proposed accesses to Sites 10 – two on Harvey Lane (for Sub-Sites 10A-D) and one on Upgate Road (for Sub-Sites 10E). The access locations have been proposed to allow for phased construction, and to facilitate flexible access to individual land parcels. Using CRC14 as a haul route to access Sub-Site 10E would require the removal of hedgerows that provide linear habitat connectivity and form the field boundary between CRC14 and Sub-Site 10E. Hedgerow removal at this location can be avoided by utilising the existing site access point on Seething Road. This is considered less impactful and therefore proposed, as detailed in the Transport Assessment [APP-174 – APP-177] .	Under discussion
NCC TA – 27	Site 10	Outline CTMP [APP-201]	Access to Sites 10A to 10D should be consolidated to a single access point, either A61 or A62, in line with approaches required for other NSIPs in similar field interconnectivity scenarios.	Access A61 and A62 are considered necessary for the safe and efficient construction of Sub-Sites 10A to 10D, and to accommodate flexibility during the construction programme. The Applicant will continue dialogue with the Consultee regarding these access points.	Under discussion
NCC TA – 28	Site 10	Outline Cable Route Construction Statement [APP-216] Outline CTMP [APP-201]	Access A60 has not been discussed, and an additional access from the B1332 into Site 10C is not supported; access should instead be via A61 or A62 as noted above.	A60 is a highway access point for the construction phase, and will facilitate the temporary construction phase of the CRC. Whilst trenchless construction methods have been agreed for A and B roads, including B1332, access is required for the construction of the CRC9. Due to the inclusion of avoidance areas along CRC9 (CRC9B), as shown in Sheet 6 the Outline Cable Route Construction Statement [APP-216] , trenchless construction methods are proposed. The CRC9B avoidance area relates to the crossing of Lower Spring Wood County Wildlife Site, woodland and veteran hedgerows.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Resultantly, access to the section of CRC between CRC9B and B1332 is required to be made from access A60.	
NCC TA - 29	Site 10	Outline CTMP [APP-201]	Access A64 should be removed and CRC14 and Access A65 to be used for Site 10E.	A64 is a highway access point to facilitate the temporary construction phase of CRC14. As detailed in NCC TA-26, this access is proposed to minimise potential hedgerow removal between CRC14 and Sub-Site 10E. The Applicant will continue dialogue with the Consultee regarding this access point.	Under discussion
NCC TA-30	Internal haul routeing	Outline CTMP [APP-201]	The expectation remains that all construction traffic will enter and leave onto appropriate standard roads, as outlined above, and that internal haul routes or CRCs will be used to access individual site. This has been the approach taken on other NSIPs.	The use of internal haul routes have been proposed, where practicable, to minimise construction vehicles on the Local Road Network. As is detailed above in NCC TA-3, TA-12, TA-21, TA-24, TA-26 and TA-28, the presence of avoidance areas and other ecological environmental constraints along sections of the CRC are such that some local roads are required to be used to facilitate the construction of the Scheme. Site access design, swept-path analysis and visibility splays have been undertaken to evidence suitability for access by construction vehicles, and are shown in the Transport Assessment [APP-174 to 177] . The management and mitigations detailed within the Outline CTMP [APP-201] have also been designed to minimise and mitigate effects on the Local Road Network.	Under discussion
NCC TA-31	HDD Methodology	Outline Cable Route Construction Statement [APP-216]	Horizontal Directional Drilling is required for all A and B roads affected.	As detailed in NCC TA-1, it has been agreed that trenchless crossing techniques such as HDD will be used on A140, B1527 and B1332. Further information can be found in the Outline Cable Route Construction Statement [APP-216] .	Under discussion

3.10 Socio-Economics

Table 3.9: Socio-Economics

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
NCC SE - 1	Employment, Skills and Supply Chain	Outline Employment, Skills and Supply Chain Strategy [APP-205]	The consultee notes the proposals set out in the Outline ESSCS and will continue to work with the applicant to develop the detailed Skills Supply Chain and Employment Plan	An Outline Employment, Skills and Supply Chain Strategy (‘ESSCS’) [APP-205] has been prepared to set out the Applicant’s commitment to maximising local employment and upskilling opportunities from the Scheme.	Under discussion

3.11 Soils and Agriculture

Table 3.10: Soils and Agriculture

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC SA - 1	Soils and agricultural land	ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]	NCC's concern relates to the cumulative use of BMV and the land loss of BMV. NCC's concern on land use relates solely to the use of agricultural land across Norfolk, rather than to the East Pye project in isolation [RR-1471] paragraphs 3.2 to 3.6. NCC recognises that the permanent land loss will be limited to 28.9ha of BMV, and that otherwise the land use change will be temporary, albeit for up to 60 years.	The land use change is recognised and reported in the ES. There is the potential for the land under and around the panel to continue to be farmed. There are no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade. The land loss of 28.9ha of BMV has been identified as a moderate adverse effect which is significant. The effect on food production and on the wider economy is not significant. The area on farms in Norfolk is about 417,633ha (presented in Table 15.9 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]). 4,750 ha would represent 1.1% of that area. Currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) is not being cropped. The effect on food production and the related rural economy, with or without continued agricultural production from sheep grazing, is not significant.	Under discussion
NCC SA - 2	Soils and agricultural land	ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]	NCC has concerns on loss of agricultural land. More widely, the County Council is concerned at the lack of a strategic approach to the siting of a number of new large scale solar farms across the county, which is resulting on cumulative and clustered impacts on Norfolk's environment, and the particular local communities and businesses that will be affected. In addition, the County Council has serious concerns about the cumulative impacts of this proposal sitting alongside other types of approved and proposed energy infrastructure NSIPs in South Norfolk, including the major grid connection works being carried out adjacent to Norwich Main associated with the consented Hornsea Project Three Offshore Wind Farm (EN010080); and the proposed new 400 kV overhead power line running between Norwich and Tilbury (EN020027).	The Applicant is aware of other projects in the region. The technical chapters of the ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Statement of Need [APP-206] explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. The Clean Power 2030 Action Plan sets out a pathway for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that NESO's strategic plans build upon their own connections	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination	

3.12 Waste

Table 3.11: Waste

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC W-1	Waste Mitigation: Reuse	ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] Outline CEMP [APP-196] Outline Soil Resource and Management Plan [APP-204]	Paragraph 18.5.5 of the ES Non-Technical Summary [APP-194] states that a Site Waste Management Plan (SWMP) will be developed to establish how waste and materials are managed during construction, and that there will be a focus on reuse of waste. The principle of reuse has also been applied to arisings from excavations such as the cable route through both the SWMP and the Soils Management Plan/Soils Resource Management Plan. NCC considers that for this scheme ground investigations can take place as a requirement post-consent and feed into the Outline Construction Environmental Management Plan regarding potential reuse of materials arising during the construction phases.	The Applicant has sought to maximise accordance with the waste hierarchy, through the on-site reuse of uncontaminated excavated soil and stone. Any material will be removed for treatment or disposal if it is found to be contaminated and cannot be treated on site. The Scheme will minimise and eliminate waste streams or over-use of materials where practicable, pursuing opportunities for reusing material resources. When reuse and prevention are not feasible, waste will be managed according to the waste hierarchy.	Agreed
NCC W-2	Waste Assessment Methodology: Current Baseline	ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]	NCC raised concerns at the scoping stage regarding the regional scale at which the baseline landfill capacity was assessed. The County Council is pleased to note that [APP-054] contains information on landfill capacity within Norfolk.	The Applicant has assessed baseline void capacity for non-hazardous landfill across the East of England region, to reflect the likely geographic area that waste from the Scheme may be handled. Upon request by Norfolk County Council at EIA Scoping Stage, the Applicant included specific information of non-hazardous landfill capacity and waste handling capabilities within Norfolk.	Agreed
NCC W-3	Waste Assessment Methodology: Future Baseline	ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]	NCC disagrees with the assumption that should non-hazardous landfill capacity reach zero then new landfills will be approved. In Norfolk, the underlying geology makes much of the county unsuitable for hazardous or non-hazardous landfills, and it cannot be assumed that new capacity would be suitable to be approved within the county.	There is no publicly available information about changes to landfill capacity by the time construction of the Scheme is complete. The Applicant considers it is not reasonable to consider that there would be no void space in the East of England in future due to the continued need for landfill capacity and the creation of void capacity through new mineral extraction sites. The Applicant has therefore assessed future waste outflows from the Scheme against current provisions, although clearly acknowledges that the quantum of void capacity in future will not be equal to current conditions. Due to this lack of long-range forecasting for both inert/non-hazardous landfill void capacity space, it has been considered that void capacity during the operational phase of the Scheme would be medium sensitivity, and during the peak replacement and decommissioning phases would be very high sensitivity to additional pressures. National void	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
				capacity for hazardous capacity is considered very high sensitivity at all phases of the Scheme.	

3.13 Ground Conditions

Table 3.12: Ground Conditions

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
NCC GC - 1	Scope of Assessment	ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [APP-187]	NCC considers that the issue of mineral resource safeguarding has been correctly addressed in the ES, and that the embedded mitigation and subsequent work post-consent will enable the Scheme to appropriately address the issue and therefore not result in needless sterilisation of safeguarded mineral resources.	The ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [APP-187] provides a suitable, proportionate and sufficient assessment of the impacts of the construction, operation and demolition of the Scheme upon safeguarded mineral deposits.	Agreed

3.14 Compensation and Community Benefit

Table 3.13: Compensation and Community Benefit

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NCC CB-1	Compensation	N/A	NCC remains of the view that there needs to be appropriate compensation for those households, communities and businesses affected by the proposed solar farm.	The Applicant's Book of Reference [APP-022] includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Scheme, such as noise and vibration. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.	Agreed
NCC CB-2	Community Benefit Fund	N/A	NCC would expect the Applicant to set up a Community Benefit Fund. The application does not include any details for such a fund.	The Applicant is committed to ensuring that local communities benefit from the Scheme. Throughout the pre-application process, the Applicant has consulted on community benefits and based on feedback and ongoing discussions, will determine how best to distribute funding. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside the DCO process (it cannot be considered as part of the decision-making process). The Applicant welcomes the continued engagement with Norfolk County Council on the mechanics of the Community Benefit Fund and the areas in which it will contribute to. The Applicant will also continue to engage with other consultees, such as South Norfolk Council, local parish councils and any local communities that would like to be involved and have needs or services they would like to see benefit from the available funds.	Under Discussion

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited [the Applicant] and Norfolk County Council, as specified below.

4.1.2 Duly authorised for and on behalf of East Pye Solar Limited.

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of Norfolk County Council.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

A.1.1 The parties have engaged throughout the pre-application stage, which comprised technical meetings and regular planning meetings. In addition, the following stages of consultation has taken place:

- Non-statutory consultation ('Phase One' consultation) held between 23 October and 6 December 2024;
- Statutory consultation ('Phase Two' consultation) held between 18 June and 6 August 2025; and
- Targeted consultation held between 22 October and 26 November 2025.

A.1.2 A summary of meetings and key correspondence that have taken place between the parties in relation to the Application is provided in **Table A.1**.

Table A.1: Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
Project Wide Matters		
07 May 2024	Virtual Meeting	Progress / programme update, cumulative schemes, consultation, PPA
06 November 2024	Virtual Meeting	Progress / programme update, non-statutory consultation, EIA Scoping
04 December 2024	Virtual Meeting	Progress / programme update, consultation, EIA Scoping
22 January 2025	Virtual Meeting	Progress / programme update, officer engagement, consultation feedback, PPA
05 March 2025	Virtual Meeting	- Project progress update - Scoping update
08 April 2025	Virtual Meeting	- Project progress update - PEIR update - Statement of Community Consultation - Compensation

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
07 May 2025	Virtual Meeting	- Project progress update - PPA - Councillor briefings
03 September 2025	Virtual Meeting	- Project progress update - Statutory Consultation - Scheme Changes - Targeted Consultation
09 October 2025	Virtual Meeting	- Project progress update - Targeted Consultation - Cumulative Schemes
22 October 2025	Email Correspondence	Consultation on Environmental / Landscape Strategy
05 November 2025	Virtual Meeting	- Adequacy of Consultation Milestone - Targeted Consultation
03 December 2025	Virtual Meeting	- Adequacy of Consultation Milestone - Targeted Consultation - Community Benefits
15 December 2025	Email Correspondence	Consultation on Environmental / Landscape Strategy
27 January 2026	Virtual Meeting	- Project Overview and Design Evolution - RLB Refinement - Design Principles and Guidance - Landscape Mitigation and Green Infrastructure Strategy - grassland and woodland creation, linear tree belt planting, community spaces, permitted paths, ghost pond restoration, and skylark mitigation

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		• Application of Buffers and Offsets - Minimum offsets have been established for various features: 15 m from trees, 10 m from watercourses, 30 m from badger setts, 50 m from residential properties (case by case), and specific distances for ancient woodland, ponds, and wildlife sites • Integration with Local Strategies including Greater Norwich's local plan, green infrastructure strategy, Norfolk Local Nature Recovery Strategy, and the Norfolk Wildlife Trust South Norfolk Claylands Initiative, • Community and Public Access Features • Technical Discussions on Tree Guards • Technical Discussions on Hedgerows and TPOs • Technical Discussions on Long-term Management Responsibilities
04 February 2026	Virtual Meeting	• Project progress update • Issues Tracker • PPA
13 May 2026	Virtual Meeting	• Project progress update • SoCGs
16 June 2026	Virtual Meeting	• Project progress update • SoCGs
05 August 2026	Virtual Meeting	• Project progress update • SoCGs • Hearings

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
28 August 2026	Email	First draft of SoCG shared with consultee
28 September 2026	Meeting	- General SoCG approach and programme; - SoCG tables: Draft DCO, EIA matters, compensation and community benefit; - Design matters; and - DCO Interrelationships Report: The Parties agree that engagement on the form and content of the DCO Interrelationships Report will continue during the Examination, and that the Applicant intends to submit the report at a later stage of the Examination.
Water Environment		
10 December 2025	Virtual Meeting	Key Topics: - Inconsistencies in scheme description between documents/detail on figures. - ES Chapter 9 Sensitivity and Magnitude definitions - Sequential Test/sequential approach to location of infrastructure within Order Limits - Dimensions of concrete blocks - Watercourse crossings - Ground investigations/infiltration testing - Standalone inverter/converter unit drainage - Access track drainage

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		• Surface water management of Substations/BESS (transformers/leak management) • Maintenance Plan Key Outcomes: • Discrepancies between ES Chapters and FRA to be corrected. Topographic figures to be updates to show 1 metre LiDAR resolution and watercourses labelled on figures. • Surface water flood risk sensitivity and magnitude definitions to be added to ES Chapter 9 including Annual Exceedance Probability definitions. • Sequential Test requirements to be discussed with Applicant/planning. • Dimensions of concrete blocks to be set out in FRA • Applicant to be advised on requirement to show watercourse crossings clearly and their level of permanence. • Geology section in FRA to be expanded to provide more detail on historic borehole within vicinity of Order Limits (considered to be representative of geology in absence of site-specific investigations). • Approach to the drainage solution of standalone inverter/converter units to include a commitment to providing an overflow solution

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		- Access tracks to have swales or filter drains running parallel and/or downstream of the tracks - Preliminary maintenance plan to be prepared including likely activities and frequency which will be included in the Outline Operational Environmental Management Plan (OOEMP).
06 July 2026	Virtual Meeting	- Overview of DCO for East Pye - Environment Agency model extents CRC6 - Sequential approach / PV arrays - Freeboard allowances - InfoDrainage model outputs - Ground investigation (GI) recommendations - Drainage detail BESS/Substations - Access track drainage - Preliminary Drainage Maintenance Plan (PDMP)
18 August 2026	Virtual Meeting	- BRE Testing - Access Tracks - Permeability
01 October 2026	Meeting	Meeting with NCC / LLFA to discuss the SoCG.
Cultural Heritage		
30 September 2024	Email Correspondence	- Initial geophysical survey interpretations shared with Consultee, noting the further addition of new fields within the Order Limit which will need to be surveyed; - Draft AP report should be available end October;

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		• Hoping to discuss Trenching within Scheme areas already surveyed; • Shared initial CRC route, noting it covers a larger area than will be included within the final Order Limits. Asks if a 'lite' DBA for CRC will be appropriate due to small impact of cable trench. Consultee responded 11 October 2024 • Consultee requested Applicant resend geophysics interpretations and provide updated Order Limits boundary. • Broadly agrees with 'lite' DBA for CRC. Asked for targeted walkover on areas where desk-based research has identified upstanding earthworks or parish boundary which survives as field boundary; • Consultee wishes to work up GIS workspace for NCC prior agreeing any trench locations and any areas for preservation <i>in situ</i>; • Generally advised getting on with trenching as/when you can, with land access being key factor; • Requested Teams call after receipt of geophysics data.
November 2024	Virtual Meeting	• Discussed overall Scheme in more detail; • Arranging further geophysics in new areas of Scheme and CRC where possible; • Agreed to target trial trenches on results of present assessments and survey areas thus far and asked for trench location plan to be provided to be agreed.
February 2025	Scoping Opinion	• Consultee notes that trial trenching has been agreed to commence as soon as possible, irrespective of the EIA stage.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
19 June 2025 30 June 2025 4 July 2025	Email Correspondence	• Pre-determination trench location plan provided, targeting potential features/areas of archaeology based on HER data, cartographic sources, parish boundaries, geophysical survey, and aerial imagery (LiDAR and AP), combined with site visits; • Data provided as shapefiles; • Noted trenches exclude 'blank areas' and CRC, which will be reviewed when impacts are better known. Consultee responded 11 July 2025 • Asks for further rational behind pre-determination trench placements; • Queries geophysical survey anomalies not being targeted at this stage; • Asks to have a follow-up via Teams.
11 July 2025	Virtual Meeting	• Discussion of existing pre-determination trench plans; • Agreement to target areas of field boundaries, notably near Sites 1 and 4 to see if there is relationship between boundaries and Roman period remains.
16 July 2025 25 July 2025 30 July 2025	Email Correspondence	• Applicant provided Consultee with updated drawings and figures to show justification of pre-determination trench targeting; • Draft Written Scheme of Investigation (WSI) provided to Consultee; Consultee responded 30 July 2025 • Consultee approved WSI; • Notes start date for pre-determination trenching to begin 4 August 2025.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
4 August 2025	Site Visit	Applicant and Consultee on Site for start of pre-determination trenching.
8 August 2025 21 August 2025 2 September 2025 26 September 2025 7 October 2025 23 October 2025	Site Visits	Series of monitoring visits with Applicant and Consultee to view progress of pre-determination trenching, and areas of identified archaeological interest within Scheme.
6 August 2025 20 August 2025 3 September 2025 4 September 2025 4 September 2025 12 September 2025 30 September 2025 3 October 2025 9 October 2025 16 October 2025 22 October 2025	Email Correspondence	Series of emails between Applicant and Consultee including the following: - Trench relocations within Scheme due to on-site restrictions; - Progress updates; - Sign-off requests; - Approach to kiln sampling and concerns regarding kiln excavation; - Trenches 8A-05, 7H-02 and 7H-03 de-scoped and trenching pushed to post-consent.
11 November 2025	Email Correspondence	CRC limits now known, so opening discussion on fieldwork requirements across CRC.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Consultee responded 5 December 2025 - States requirements for geophysical survey across full CRC, preferably prior to submission of ES; - Trenching will be required at some stage, which will be determined when results of geophysics are available.
13 November 2025	Email Correspondence	- Notification of completion of Trenching; - Survey of excavated trenches issued; - Spreadsheet of trench interpretations issued;
16 December 2025	Email Correspondence	- Requested clarification from Consultee of CRC requirements. Consultee responded 16 December 2025 - Confirmed full route of CRC should be subject to geophysics pre-consent.
18 December 2025	Phone Call	Discussion regarding content of outline Archaeological Mitigation Strategy (AMS). Consultee confirmed content in subsequent email.
19 December 2025	Phone Call	- Geophysical survey across CRC has been problematic, due to access issues. Consultee followed up by email 19 December 2025 - Confirmed remainder of survey will need to take place post-determination; - Confirmed trenching and possible excavation within CRC will be required post-determination.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
5 January 2026	Email Correspondence	Notification of pending reference to Woodton kilns in forthcoming publication.
5 February 2026	Phone Call	Discussion regarding content of draft trenching report. Consultee confirmed content in subsequent email.
14 July 2026 23 July 2026	Email Correspondence	- Draft CRC geophysical survey results provided; - Queried several comments in Relevant Representations. Consultee responded 17 July 2026 - Noted draft report will remain unapproved as full survey has not been carried out; - Queried some results of CRC geophysics thus far. These areas will be reviewed by Applicant; - Confirmed trenching will still be required post-consent across Scheme and CRC. - Agreed to Teams meeting 31 July 2026.
31 July 2026	Virtual Meeting	- Notification of restarting of geophysical survey along CRC w/c 10 August 2026. Hoping to have remainder of route finished in early September; - Will pass along greyscales to Consultee once available; - Applicant noted as much trenching as possible done pre-determination. Consultee noted post-consent works will likely include additional trenching, as well as mitigation areas, as outlined in AMS. AMS is to be updated once geophysics results of CRC are available; - Consultee noted using HDD as a tool to mitigate archaeological sites

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		can be a double-edged sword. Applicant noted areas of HDD are focussed near hedgerows due to ecological issues; Applicant noted lack of peats across areas of Scheme trenched thus far, a part from near known ponds. Consultee noted peats in Scheme area may only be present in areas of watercourses. BGS datasets are solely a model.
Transport and Access		
15 October 2024	Virtual Meeting	Wide range of Transport topics
22 July 2025	Virtual Meeting	Wide range of Transport topics
3 October 2025	Virtual Meeting	PRoW Management - Design Approach and Mitigation Measures for PRoWs including offsets, diversions, permissive routes and community access - Definitive Map update queries - Visual Amenity Assessment, approach within the LVIA
26 November 2025	Virtual Meeting	Wide range of Transport topics
9 December 2025	Virtual Meeting	Wide range of Transport topics
7 January 2026	Virtual Meeting	Wide range of Transport topics
5 February 2026	Virtual Meeting	Wide range of Transport topics
Socio-Economics		
7 January 2026	Virtual Meeting	- Employment, Skills and Supply Chain Strategy ('ESSCS') Workshop. - Provided an outline of the Applicant's proposed Outline ESSCS demonstrating alignment

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		with Norfolk's NSIP Employment and Skills Framework. - Presented the Applicant's commitment to supporting local employment, training and supply chain opportunities through the development of the Scheme. - Parties discussed proposed activities and potential partners to maximise local opportunities to incorporated into the Outline ESSCS to shape a targeted and deliverable Outline ESSCS.
Ground Conditions		
28 March 2025	Telephone Conversation with follow up Email Correspondence	Key Topics: - The scope of the Mineral Resources Assessment Desk Study. - Whether ground investigation was required to support the application. Key Outcomes: - The ES would include: - Details of the depth and width of trenches, and types, depths, diameters and widths of any foundations. - Details of the methodology for reuse of incidentally excavated mineral within the Scheme, including assessment for the suitability for reuse, and separation and stockpiling of different materials - Minerals-specific ground investigation was not required to support the application.