



East Pye Solar
Statement of Common Ground: South Norfolk
District Council

Revision 1
October 2026

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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 South Norfolk District Council (SNDC). Collectively, the Applicant and SNDC 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 SNDC.
- 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 topics set out in **Table 1.1**. Each topic has a unique reference which relates to the topic matter.
- 1.3.4 The Record of Engagement between the parties can be found in Appendix A.

Table 1.1: Topic Referencing

Topic	Reference
Scheme Description, Development Consent Order and Securing Mechanisms	SNDC SDDCO
Energy Need	SNDC EN
Cumulative Assessment and Effects	SNDC CAE
Landscape and Visual	SNDC LV
Ecology and Biodiversity	SNDC EB
Noise and Vibration	SNDC NV
Air Quality	SNDC AQ
Socio-Economics	SNDC SE
Ground Conditions	SNDC GC
Cultural Heritage	SNDC CH
Waste	SNDC W
Electromagnetic Fields	SNDC EMF

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 South Norfolk 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 SNDC 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
SNDC SDDCO - 1	Draft Development Consent Order – Requirement 1	Draft DCO [AS-032]	The Council notes that, in light of Local Government Review (LGR), South Norfolk District Council is unlikely to remain the named Local Planning Authority (LPA) responsible for discharging these Requirements. The drafting should therefore be amended to future-proof the provision and reflect potential governance changes.	The Applicant has addressed this representation by updating the wording in Requirement 1 of the Draft DCO [AS-032] to include “ <i>or its successor in function as the relevant planning authority</i> ”. This amendment will be captured as part of the next iteration of the DCO to be submitted.	Agreed
SNDC SDDCO - 2	Draft Development Consent Order – Requirement 3	Draft DCO [AS-032]	The Council notes that no clear procedure is set out for the submission or approval of amendments under this Requirement. It is unclear how such amendments are to be made (including whether they must be submitted in writing), and the drafting does not provide a robust or transparent mechanism. SNDC are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The full procedure in respect of the discharge of Requirements is set out in Schedule 15 (Procedure for discharge of requirements) to the Draft DCO [AS-032] . That Schedule, in combination with Requirement 3, provides a robust and transparent mechanism. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25 th September and ahead of Deadline 1.	Under discussion
SNDC SDDCO - 3	Draft Development Consent Order – Requirement 4	Draft DCO [AS-032]	The Council considers that this Requirement should be reworded to require details to be “submitted to and approved by the relevant planning authority.” The current drafting is ambiguous as to whether approval is required prior to commencement, or whether submission alone is sufficient to discharge the Requirement. SNDC are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	Sub-paragraph (1) of Requirement 4 states that “ <i>Prior to the commencement of the authorised development the undertaker must submit to the relevant planning authority for approval the terms of reference for a community liaison group</i> ”. This makes clear that the terms of reference are subject to approval by the relevant planning authority and that such approval must be obtained pre-commencement of the authorised development. In addition, sub-paragraph (2) of Requirement 4 provides that “ <i>the community liaison group must be established prior to commencement of the authorised development</i> ”. Practically, this therefore requires the terms of reference to be approved by the relevant planning authority prior to the commencement of the authorised development to allow the community liaison group to be established. This drafting follows the approach in recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25 th September and ahead of Deadline 1.	
SNDC SDDCO – 4	Draft Development Consent Order – Requirement 5	Draft DCO [AS-032]	The Council notes that this Requirement does not include Works Nos. 4A and 4B relating to the proposed National Grid substation. Clarification is requested, for the avoidance of doubt, as to whether these works will be undertaken separately by National Grid and whether detailed design approval will instead be secured through a separate TCPA planning application. SNDC are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The Draft DCO [AS-032] provides consent for Work Nos. 4A and 4B to be undertaken by either the Applicant or National Grid. Article 36(1) of the Draft DCO [AS-032] sets out the general position that the provisions of the Order have effect solely for the benefit of the undertaker (i.e. East Pye Solar Limited, the Applicant). However, Article 36(2) confirms that the provisions in respect of Work No. 4 (new National Grid substation) and Work No. 5 (works in connection with the existing overhead transmission electric line) are for the benefit of the undertaker and National Grid. As explained in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], the grid connection offer received from NESO, working with NGET, contracted the Applicant to provide the land and to gain consent for the proposed new National Grid Substation, which was accepted by the Applicant. Pursuant to that offer, the Applicant is seeking a consent which facilitates the delivery of the new National Grid substation such that a separate TCPA 1990 application for the National Grid works is not required. However, should NGET wish to develop an alternative design then they would be able to make a separate TCPA planning application. The Applicant has updated the drafting of Requirement 5 to ensure that no part of Work No. 4 may commence until details have been submitted to and approved by the relevant planning authority. The details submitted must accord with the design principles, parameters and commitments. Following Issue Specific Hearing 1, Works Nos 4 and 5 have also been included within a new sub-paragraph (4) of this requirement. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25th September and ahead of Deadline 1.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC SDDCO – 5	Draft Development Consent Order – Requirement 6	Draft DCO [AS-032]	The Council considers that sub-paragraph (1) should be amended to refer to approval by the “relevant planning authority in consultation with” the consultees listed in sub paragraph (3), rather than separating these provisions across different sub paragraphs. SNDC are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The Applicant does not consider any amendment to be necessary. The Requirement already secures the need for approval by the relevant planning authority (sub-paragraph (1)) and such approval to be in consultation with named consultees (sub-paragraph 3)). The drafting follows the approach in recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25 th September and ahead of Deadline 1.	Under discussion
SNDC SDDCO – 6	Draft Development Consent Order – Requirement 7	Draft DCO [AS-032]	The DCO's within SNDC and Broadland District Council such as the three National Highway Schemes along the A47 specified the consultees such as Natural England, Environment Agency, Norfolk County Council as Local Highway Authority or Lead Local Flood Authority. Other DCO's such as Equinor (Sheringham and Dudgeoness Extension Projects), RWE (Norfolk Vanguard and Norfolk Boreas), and National Grid (Norwich to Tilbury) adopted the same approach and so we would expect a similar approach with this DCO.	The Applicant will consider the precedent submitted by SNDC. The existing drafting of "the relevant statutory nature conservation body" is considered to be most appropriate and aligns with DCO precedent (see also recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026). At the moment, this has the effect that Natural England is covered as the named consultee, although the broader reference to the 'statutory nature conservation body' is used to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The use of “statutory nature conservation body” is Natural England's preferred drafting.	Under discussion
SNDC SDDCO – 7	Draft Development Consent Order – Requirement 8	Draft DCO [AS-032]	The Council considers that the relevant statutory nature conservation body should be clearly identified in sub-paragraph (1), which would include Natural England. Clarification is also requested as to whether approval of this Requirement would remove the need for subsequent licensing from Natural England (e.g. for bats and Great Crested Newts), or whether further approvals would still be required.	The existing drafting of the relevant statutory nature conservation body" is considered to be most appropriate and aligns with DCO precedent (recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026). At the moment, this has the effect that Natural England is covered as the named consultee, although the broader reference to the statutory nature conservation body' is used to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The use of “statutory nature conservation body” is Natural England's preferred drafting. Requirement 8 will not remove the need for any protected species licensing from Natural England. ES Volume 3, Appendix 8.10 – Outline Protected	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Species Mitigation Strategy [APP-161] sets out where licences may be required.	
SNDC SDDCO – 8	Draft Development Consent Order – Requirement 9	Draft DCO [AS-032]	The Council considers that the BNG baseline should reflect the current condition of the site. There is concern that the baseline may not be agreed prior to pre commencement works being undertaken. The Requirement should therefore be amended to ensure that the baseline is secured and agreed before any works that could affect it take place. SNDC are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	Requirement 9(2) requires the final biodiversity net gain strategy to include details of the metric used to calculate the percentages of biodiversity net gain secured. The metric and accompanying guidance set out the position regarding the appropriate baseline date. If habitat clearance permitted by the DCO takes place before the submission of the final biodiversity net gain strategy for approval under Requirement 9(1), then an earlier baseline date will be used to ensure the baseline captures the biodiversity value on-site prior to the clearance activities. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25 th September and ahead of Deadline 1.	Under discussion
SNDC SDDCO – 9	Draft Development Consent Order – Requirement 12	Draft DCO [AS-032]	The Council considers that discharge of this Requirement would be undertaken in consultation with the Historic Environment Service, and this should therefore be reflected in the wording of sub-paragraph (1). Unfortunately, it appears that the applicant has misinterpreted SNDC's comment. We have not referred to Historic England; it is our view that Requirement 12 (2) needs to include the Historic Environment Services (NCC) who are the specialists in this field and an external body to SNDC.	Sub-paragraph (1) of Requirement 12 relates to the carrying out of programmed archaeological investigations as set out in the archaeological mitigation strategy submitted with the DCO application. As this strategy is already in its final form it does not provide for the relevant planning authority's approval and therefore Historic Environment Services would not need to be consulted. Sub-paragraph (2) of Requirement 12 requires a written scheme of investigation (WSI) to be submitted and approved before the authorised development can be commenced. The WSI must be substantially in accordance with the ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] . The scope of works for the pre-determination of archaeological evaluation by trial trenching was agreed with the Senior Planning Archaeologist of Norfolk County Council Historic Environment Service (NCCHEs) and therefore the Applicant has involved NCCHEs as appropriate in preparation of the secured documents. The Applicant therefore does not consider that it is necessary to require consultation with Historic Environment Services on the final plan to be submitted for approval although the Applicant will continue to consider this request. For completeness, there is nothing in the draft Order preventing SNDC	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				from consulting with Historic Environment Services in any event in discharging Requirement 12.	
SNDC SDDCO – 10	Draft Development Consent Order – Requirement 13 and 14	Draft DCO [AS-032]	The Council considers that discharge of these Requirements would require consultation with the Environment Agency, the Local Highway Authority, and Natural England. This should be explicitly included in the wording of sub-paragraph (1). SNDC maintains its view and re-iterate the comments made above in SDDCO-6 with regard to this approach being used on other DCO's within the district.	The Applicant will consider the precedent submitted by SNDC. Norfolk County Council, as the relevant highway authority, is a named consultee in respect of Requirements 15 and 16 and these are the relevant construction and operational traffic management plans relating to highways matters. Natural England is a named consultee in respect of Requirements 7, 8, and 9 which are the relevant management plans / strategies relating to ecological matters. The Applicant does not consider it necessary to add them as named consultees for Requirements 13 and 14. The Environment Agency is specified as a consultee in sub-paragraph (3) of Requirement 13 and sub-paragraph (2) of Requirement 14.	Under discussion
SNDC SDDCO – 11	Draft Development Consent Order – Requirement 15 and 16	Draft DCO [AS-032]	The Council considers that sub-paragraph (1) should refer to approval by the "relevant planning authority in consultation with" the Local Highway Authority, rather than separating consultation and approval into different sub-paragraphs. SNDC maintains its view.	The Applicant does not consider any amendment to be necessary. These Requirements already secure the need for approval by the relevant planning authority (sub-paragraph (1)) and such approval to be in consultation with named consultees (i.e. the relevant highway authority) (sub-paragraph (3)).	Under discussion
SNDC SDDCO – 12	Draft Development Consent Order – Requirement 17	Draft DCO [AS-032]	The Council considers that sub-paragraph (1) should refer to approval by the "relevant planning authority in consultation with" the Local Highway Authority, for consistency and clarity. SNDC maintains its view.	The Applicant does not consider any amendment to be necessary. This Requirement already secures the need for approval by the relevant planning authority (sub-paragraph (1)) and such approval to be in consultation with named consultees (i.e. the relevant highway authority) (sub-paragraph (3)).	Under discussion
SNDC SDDCO – 13	Draft Development Consent Order – Requirement 18	Draft DCO [AS-032]	The Council considers that discharge of this Requirement should include "in consultation with" Natural England and this should be reflected in the wording of sub paragraph (1). The Council maintains its view and are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The Applicant will consider any request from Natural England to be included as a consultee. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25th September and ahead of Deadline 1.	Under Discussion
SNDC SDDCO – 14	Draft Development Consent Order – Requirement 19	Draft DCO [AS-032]	The Council considers that discharge of this Requirement should include "in consultation with" Norfolk County Council and that this should be reflected in the drafting of sub-paragraph (1).	The Applicant will consider any request from Norfolk County Council to be included as a consultee.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			The Council maintains its view and are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25 th September and ahead of Deadline 1.	
SNDC SDDCO - 15	Draft Development Consent Order – Requirement 20	Draft DCO [AS-032]	The Council considers that discharge of this Requirement should include “in consultation with” Norfolk County Council (in its capacity as Minerals and Waste Authority), and this should be clearly reflected in the wording. The Council maintains its view and are awaiting sight of the revised draft DCO which the applicant has advised will be submitted at Deadline 1.	The Applicant will consider any request from Norfolk County Council to be included as a consultee. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25th September and ahead of Deadline 1.	Under Discussion
SNDC SDDCO - 16	Draft Development Consent Order – Schedule 15	Draft DCO [AS-032]	Paragraph 5 – Fees The Council does not agree with the proposed fees for the discharge of requirements. The Council considers that these should align with the national fee schedule, consistent with other NSIP Development Consent Orders with which the Council has experience. As the Council has discussed, and as with the Norwich to Tilbury DCO, it considers that the fee should relate to the Discharge of a Condition in line with the National Fee Schedule which is how the Council has dealt with its 68 discharge of requirements for various NSIPs to date. The Council considers that ongoing discussions are required on this matter.	The fees identified in Schedule 15 are taken from Schedule 1 of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. Specifically, the fee for the first application for the discharge of requirements in paragraph 5(2)(a) corresponds with item 11(2) in the scale of fees in Part 2 of the Schedule, relating to operations not coming within the other categories listed. The fee identified is £293 per 0.1 hectare subject to a maximum of £2,535. The fee in paragraph 5(2)(b) for subsequent applications for discharge of £578 corresponds with the fee in paragraph 4 of Schedule 1, being the fee payable where an applicant has previously applied for the approval under the same outline planning permission, a scenario that mirrors that envisaged by paragraph 5(2)(b). The fee in paragraph 5(2)(c) is a general administrative fee, in recognition that the applications made for approval as required by detailed management plans will be targeted and limited in scope. The Applicant notes that since the DCO Application was submitted, the relevant planning authority is now able to recover costs relating to any relevant service (as defined in s54A(2) of the Planning Act 2008) pursuant to the Infrastructure Planning (Fees) Regulations 2010. This includes costs relating to the discharge of Requirements. The Applicant can	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				remove the application fee in Schedule 15 and the Council can rely on the Infrastructure Planning (Fees) Regulations 2010 if preferred. The Applicant will seek to arrange a meeting post-Deadline 1 to discuss and agree on these matters once SNDC has had time to review the changes made at Deadline 1. The revised Draft DCO [AS-032] was shared by the Applicant to SNDC (and NCC) on 25th September and ahead of Deadline 1 and comments are awaited.	

3.3 Energy Need

Table 3.2: Energy Need

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EN - 1	Energy Need	N/A	SNDC recognises the essential need to generate renewable energy to meet national targets and the need for a new National Grid substation to increase capacity within the electricity transmission network to accommodate significant new energy generation from offshore wind farms and consented TCPA planning applications in the district	The Applicant welcomes the Council's acknowledgement of the urgent need for additional renewable energy generation.	Agree
SNDC EN - 2	Project Harm	N/A	SNDC strongly objects to the project and continues to raise concerns about the specific harms the development will cause.	The Applicant will continue to engage with SNDC to seek to address SNDC's concerns about the specific adverse effects identified in relation to the Scheme	Under discussion
SNDC EN - 3	Energy Need	N/A	SNDC acknowledges that the proposed development would contribute towards meeting the UK's legally binding commitment to achieve net zero carbon emissions by 2050 and the Government's Clean Energy target of 2030. The Council is broadly supportive of renewable energy schemes in principle which is demonstrated by the array of consented TCPA planning applications across the South Norfolk District.	The Applicant welcomes the SNDC's acknowledgement that the Scheme would contribute towards meeting the UK's legally binding commitment to achieve net zero carbon emissions by 2050 and the Government's Clean Power 2030 target and notes the Council's broad support for renewable energy schemes in principle.	Agreed

3.4 Cumulative Assessment and Effects

Table 3.3: Cumulative Assessment and Effects

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC CAE - 1	Cumulative Developments	ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]	At the time of responding, SNDC requested that Tasway was considered as a cumulative scheme for the purposes of the ES but subsequently the project was paused. In light of this, SNDC consider that Tasway is not a project that needs to be considered cumulatively however this should be kept under review throughout the examination in the event that the project comes back online.	With regards to the Tasway Energy Park, the applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. This assessment can be found in ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116]. 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 <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorate's website as a DCO project. Accordingly, it is appropriate that the Tasway Energy Park project has not been taken forward for assessment as part of the short list of cumulative schemes for the cumulative effects assessment of the Scheme (see ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116]). Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance and legislation.	Agreed

3.5 Landscape and Visual

Table 3.4: Landscape and Visual

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC LV - 1	Baseline General	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121]	SNDC are content with the description of visual (including viewpoints) and landscape baseline conditions.	The description of the existing baseline landscape and visual conditions set out within ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] and ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121] is representative of the baseline site conditions and acceptable to inform the assessment. The assessment is based on accurate baseline data and local landscape planning context, including the relevant landscape character assessments produced by SNDC, and informed by landscape and visual surveys undertaken in 2025.	Agreed
SNDC LV- 2	Landscape Susceptibility SPD Methodology		SNDC considers that the Landscape Susceptibility SPD in relation to Energy Generation, Storage, and Transmission, adopted February 2026, is not relevant to the proposed development.	The Applicant agrees with SNDC's position that the Landscape Susceptibility SPD in relation to Energy Generation, Storage and Transmission (February 2026) is not relevant to the assessment of the Scheme. The susceptibility assessment presented within ES Volume 1, Chapter 7: Landscape and Visual [APP-043] and ES Volume 3, Appendix 7.1: Landscape and Visual Methodology [APP-118] has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), site-specific baseline data, professional judgement and the relevant local planning and landscape context.	Agreed
SNDC LV - 3	Scope Methodology	ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]	A draft version of the LVIA methodology was included in the Preliminary Environmental Information Report (PEIR), at the Statutory Consultation stage, and the Application version within ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] is consistent with the approach previously set out. SNDC agrees that the approach aligns with best practice set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). Agreement confirmed in a meeting 21/09/2026	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.	Agreed
SNDC LV - 4	Scope Spatial Scope	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	At PEIR stage, SNDC were content that the defined study area is sufficiently robust to consider likely significant effects on the landscape and visual resource. Agreement confirmed in a meeting 21/09/2026	The Applicant considers that the spatial 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.	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The Study Area covers the full extent of the Order Limits and applies proportionate offset distances to the various Scheme components, as follows: • A 3km Study Area extending from the new National Grid Substation and Grid Connection Infrastructure (including overhead line works) and the 400kV Project Substations within Sub-Site 1, the BESS Site and Sub-Site 5A. • A 2km Study Area extending from the BESS Site, and from the boundary of Sites 1 to 10 (which includes the solar PV arrays and 132kV Project Substations). • A 1km Study Area extending from the CRC. The Applicant considers that this tiered approach to defining the Study Area is proportionate and appropriate and provides a robust basis for identifying and assessing likely significant landscape and visual effects.	
SNDC LV - 5	Scope Temporal Scope	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	At PEIR Stage, SNDC were content that the defined temporal scope is sufficiently robust to suitably capture the evolution of landscape and visual effects from construction through operation, including establishment of mitigation; and decommissioning. Agreement confirmed in a meeting 21/09/2026	The temporal scope defined within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] appropriately informs the assessment of landscape and visual effects across the different stages of the Scheme. The agreed assessment timeframes are: • Construction Phase: 2028–2030. • Operation: 2031. • Operation Year 15: 2046. • Decommissioning: 2091. The temporal approach is considered suitable to capture the evolution of landscape and visual effects from construction through operation, including establishment of mitigation, and decommissioning.	Agreed
SNDC LV - 6	Scope Cumulative Assessment	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]	SNDC is concerned that the cumulative and in combination effects of these Projects, together with existing infrastructure, will result in landscape harm arising from the introduction of industrial scale infrastructure incompatible with rural character. Subject to confirmation that the list of cumulative schemes in the LVIA includes all relevant schemes, SNDC is content with the approach and methodology	A CLVIA has been undertaken and is reported within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. It is considered that the CLVIA as part of Chapter 7 is of sufficient scope, detail and quality to support the assessment. The cumulative assessment identifies and considers other consented, and reasonably foreseeable developments that may give rise to cumulative	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			applied to the CLVIA. It is also agreed that the cumulative impacts will not be greater than those identified for the proposed development alone.	landscape and visual effects when considered alongside the Scheme. The Applicant considers that the cumulative assessment has been undertaken in a manner that is proportionate and robust, focusing on developments most likely to contribute to cumulative effects; and is consistent with relevant guidance, including GLVIA3. ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] concludes a range of significant adverse residual landscape and visual effects including at the BESS Site, Site 1, and Site 8 as a result of effects to visual amenity and the key landscape characteristics and features of the Sites, and local character at certain district LCAs, particularly during construction and early operation. Mitigation planting and restoration of features reduce effects over time, but notable effects remain near major infrastructure and sensitive receptors. The Applicant awaits SNDC's confirmation on the list of cumulative schemes. Figure 2.1 - Cumulative Developments revision B was submitted at Deadline 1.	
SNDC LV - 7	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]	SNDC states in its Relevant Representation: Chapter 7 of the Environmental Statement provides a comprehensive assessment of potential landscape and visual effects. Given the scale and nature of the project, it is unsurprising that the assessment concludes there will be residual moderate significant adverse effects on landscape character and visual amenity at multiple locations from which the application site is visible. SNDC acknowledges that, within South Norfolk, there are no alternative sites that would avoid such effects.	The published landscape character assessments that are relied upon at the national, 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. The landscape character and features of each Site / Scheme component has also been defined to inform the assessment of baseline conditions.	Agreed
SNDC LV - 8	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]	The Applicant consulted with SNDC to agree view locations, and SNDC is content with the submitted materials.	The Applicant has undertaken consultation with the Landscape Officer in respect of the selection of assessment view locations. In response to comments received, a number of additional view locations have been incorporated into the assessment, including: VL8/Sub, VL8/LP2, VL7/LP3, VL8/LP3, VL9-VL12/LP4, VL7/LP5, VL9-VL11/LP8, VL7/LP9, VL10/LP10, VL16 and VL17/CR.	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				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 therefore considered to provide an appropriate and robust basis for establishing baseline landscape and visual conditions.	
SNDC LV-9	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]	Following a review of the submitted documents with the DCO, SNDC consider that additional viewpoints from the Via Beata, Boudicca Way, and from footpaths within the sites or on the site's boundaries would be beneficial to illustrate worst-case scenarios and the extent of change for sensitive visual receptors and the suggested locations are listed in SNDC's Local Impact Report.	This matter will remain under discussion until SNDC's Local Impact Report is received.	Under Discussion
SNDC LV – 10	Scope Visualisation for Landscape and Visual Assessment	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] ES Volume 2, Figure 7.7 - View Locations and Visualisations [APP-082]	SNDC agree that the submitted visual technical visualisations cover a reasonable number of viewpoints and locations however they should have been prepared as Type 4, not Type 3, to guarantee an appropriate level of accuracy for such complex and sensitive development.	The Applicant has consulted with the Landscape Officer in respect of the location and type of visualisations to be produced, but no response was received. The location and type of visualisations are illustrated in ES Volume 2, Figure 7.7 - View Locations and Visualisations [AS-009]. The methodology for visualisation production is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. The visualisations have been prepared in accordance with industry-standard guidance, specifically the Landscape Institute [2019] Visual Representation of Development Proposals Technical Guidance Note 06/19 [TGN 06/19]. The types of visualisation produced include: • Photowires [LI TGN 06/19 Type 3]; • Photomontages / Photowires for Winter Year 1 [LI TGN 06/19 Type 3] with no landscape measures shown; and • Photomontages Summer Year 15 [LI TGN 06/19 Type 3] with established landscape measures shown. The parties will continue discussions regarding the requirement and potential locations of Type 4 visualisations.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC LV - 11	Scope Residential Visual Amenity Assessment	ES Volume 2, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]	SNDC agree that the RVAA is undertaken accordance with relevant guidance and suitably assessed Stage 3 and 4.	The Applicant has prepared a Residential Visual Amenity Assessment [RVAA], as presented in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148] . The RVAA has been undertaken in accordance with established industry guidance set out in the Landscape Institute [2019] Residential Visual Amenity Assessment [RVAA] Technical Guidance Note 2/19.	Agreed
SNDC LV - 12	Scope Public Rights of Way Visual Amenity Assessment	ES Volume 2, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]	SNDC was concerned with the effect on recreational receptor and visual amenity during PEIR. The Applicant did not consult with SNDC to agree the Public Rights of Way Visual (PRoW) Visual Amenity Assessment approach, however, SNDC is content that the materials provide enough level of detail to inform the Landscape and Visual Assessment.	The Applicant has prepared a Public Rights of Way Visual Amenity Assessment, as presented in ES Volume 2, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]. The Assessment has been undertaken for PRoW which interact with the Order Limits and is in accordance with best practice and industry guidance including GLVIA3. It includes information about sequential effects to this specific visual receptor type due to the quantity of PRoW which physically interact with the Scheme. The assessment demonstrates that whilst construction and early operation phases will result in significant visual changes for many PRoW, the implementation of robust mitigation measures will substantially reduce these effects over time. By year 15, most PRoW will experience only slight or negligible changes, with the significance of effects generally falling below the threshold of significance	Agreed
SNDC LV – 13	Scope Night Time Effects on Landscape and Visual receptors	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	SNDC is content that the materials provide enough level of detail to inform the Landscape and Visual Assessment given the outline nature of the proposed development. Further assessment of the potential night-time effects will be requested during future planning stages with detailed design.	The Applicant considers that the Scheme is unlikely to result in significant effects arising from additional lighting Therefore, the Applicant does not agree that further assessment will be required at the detailed design stage. ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151], secured through the Outline Operational Environmental Management Plan [OOEMP] [APP-197], has been prepared to set out the approach to lighting for the Scheme. This includes measures to minimise light spill and potential effects on landscape and visual receptors, reflecting the fact that the Scheme includes limited lighting sources. It is concluded that no significant effects would arise from the Scheme in respect of lighting, and a detailed assessment of lighting effects on landscape and visual receptors has not been undertaken.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The operational lighting for the Scheme will be designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213] . As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040] , lighting is not required within the Solar PV Arrays during the operational phase. Lighting of the Project Substations, National Grid Substation and BESS would be in accordance with health and safety requirements, particularly around emergency exits, and would be similar to street lighting that operates from dusk. Lighting will be designed to be directional, downward-facing and controlled to minimise light spill, in accordance with the Institution of Lighting Professionals (ILP) guidance, as set out in the ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] .	
SNDC LV - 14	Veteran Trees	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150]	ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150] notes arboricultural surveys undertaken by two separate companies between 2024 and 2026. SNDC requested that the Applicant confirms the methodology used to identify veteran trees to demonstrate consistency of approach between the two contractors, and to provide supporting evidence of these assessments. September 2026 a) It is requested that the results of the Raven 2 assessment be provided for examination. b) Please can the applicant confirm that 100% of the DCO order limits was subject to the AIA. c) Please can the applicant confirm if further arboricultural surveys are planned	The Applicant confirms the methodology used by two companies to identify veteran trees is consistent. The veteran trees are identified in the survey by following the guidelines in BS5837:2012, RAVEN2 and Ancient Tree Guide from Woodland Trust, which comprise of age, size, and condition assessments of primary and secondary features of veteran trees. Details of veteran tree identification are provided in the General Observations or Comments column in Annex B Tree Survey Schedule in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] . The Applicant will engage with SNDC on its most recent three requests.	Under discussion
SNDC LV – 15	Ancient Woodland Review of Technical Details	Arboricultural Impact Assessment [APP-150]	SNDC raised in the submitted Relevant Representation that the locations of ancient woodland identified by Project Section within the application documents have no corresponding identification of veteran tree specimens. This information is necessary to enable the Council to properly review and provide informed comments. September 2026 Due to the scale used on the Tree Impact Plan included in the Preliminary Arboriculture Impact	The Applicant confirms that any ancient or veteran trees within or adjacent to the Order Limits including those at the boundaries of ancient woodlands have been identified. Any important trees, not only veteran trees, such as notable tree T75 have already been identified at the boundaries of ancient woodlands. A .shp file of the tree locations will be provided to SNDC for the identification of the tree locations.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			Assessment [APP-150] it is not easy to identify the locations of veteran trees. SNDC have requested, and are awaiting, a shp. file of the tree locations.		
SNDC LV - 16	Landscape and Visual Assessment Assessment of Landscape Effects	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 2, Appendix 7.4 - Landscape Assessment Tables [APP-121]	The LVIA understates the level of residual (Yr15) impact on the character and features of a number of sites, namely sites 2,3,4,5,9, and 10. SNDC consider that all will retain a significant and adverse level of impact at Year 15.	The Applicant notes the position. 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 and Visual Assessment provides an appropriate basis for identifying likely significant effects. The assessment of residual effects at Year 15 has been undertaken in accordance with the LVIA methodology set out in Appendix 7.1 [APP-118], taking account of the anticipated establishment of mitigation planting and the characteristics of each site. While the Applicant acknowledges that residual adverse effects would remain at a number of sites, it does not agree that all effects identified by SNDC would remain significant at Year 15. The Applicant considers this to be a matter of professional judgement rather than a disagreement regarding methodology, and considers the conclusions presented in the LVIA to be proportionate and robust assessment of the likely residual landscape effects.	Under Discussion
SNDC LV – 17	Landscape and Visual Assessment Assessment of Visual Effects	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 2, Appendix 7.7 - Visual Assessment Tables [APP-147]	The visual assessment follows an appropriate approach however the LVIA understates the level of residual Year 15 impact on the character and features of a number of viewpoints. Generally, there is an understatement of the magnitude of change.	The Applicant notes SNDC's position. The Applicant considers that the Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and is robust and appropriate for the assessment of the Scheme. The approach to the assessment of visual effects, including the identification of representative viewpoints, assessment of receptor sensitivity, and evaluation of the magnitude of change and	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				significance of effects, is proportionate and transparent. While the Applicant agrees that residual effects would remain at a number of viewpoints at Year 15, it does not agree that the magnitude of change or resulting significance of effects has been understated. The Applicant considers this to be a matter of professional judgement rather than a disagreement regarding methodology, and considers the conclusions presented in the LVIA to be robust and evidence based.	
SNDC LV - 18	Mitigation Embedded Mitigation Woodland and tree belts	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] Outline LEMP [APP-199]	While SNDC confirms that the project has been developed with a commitment to embedded mitigation through design, as set out within the Outline LEMP [APP-199], they have concerns regarding matters SNDC LV – 15 - SNDC LV – 18). The Outline LEMP [APP-199] sets out landscape mitigation measures, including Broadleaf Woodland, Linear Tree Belts and Individual Trees, Scrub, Native Hedgerows, Native Hedgerow with Trees, Instant Hedgerow, Flower Rich Pollinator, Tussocky Grassland, Neutral Grassland, Modified Grassland. The Council has the following comments. As noted in RR-1795, the introduction of woodland and tree belts into the predominantly open and rural landscape may create a sense of enclosure. This has the potential to be detrimental to the setting and experience of heritage assets and may also appear out of character with the open countryside, particularly where experienced in the local network of PRow's.	The approach and proposals for embedded mitigation set out within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], considers the landscape and visual matters associated with the Scheme as part of an iterative process. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing characteristic landscape features. Where proposed planting has the potential to influence landscape character, this has been assessed within ES Volume 3, Appendix 7.4 – Landscape Assessment Tables [APP-120]. The Applicant will continue to engage and discuss appropriate mitigation with the SNDC to explore how the mitigation can be more in character.	Under discussion
SNDC LV - 19	Mitigation Embedded Mitigation Fencing	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] Outline LEMP [APP-199]	The Outline LEMP [APP-199] also states that where Instant Hedgerows are not available, close-boarded fencing may be used to provide screening for glint and glare and visual amenity. SNDC strongly objects to the erection of close-boarded fencing in the countryside for this purpose, as this would appear significantly out of character and harmful to the landscape, even with hedgerow planting alongside these fence panels.	The Applicant has included the provision for fencing as a backstop position in six discreet locations across the Order Limits. These measures are included for Glint and Glare mitigation at these locations for impacts upon road safety and residential amenity. As defined in the Outline LEMP [APP-199] in Section 3.11, if required (in the absence of an instant hedgerow being available) these features will be temporary and for a short-term time period, installed alongside a new hedgerow whilst this landscape measure establishes.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC LV - 20	Mitigation Embedded Mitigation Landscape Planting near Substations	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] Outline LEMP [APP-199]	SNDC notes that the proposed landscape planting around the three 400kV substations comprises of the flower-rich pollinator mix, native hedgerow with trees, and some native linear tree belts at a greater distance. Due to safety requirements, the Council understands that trees can't be planted in close proximity to the substations or along their boundaries. As per SNC LV-18 the tree belts might conceal the substations, but they would cause adverse impact by interfering with the appreciation of the countryside context and distinctive open, rural views.	The Applicant notes the Council's comments regarding the landscape planting around the three 400kV Project Substations. The Applicant draws attention to the fact that the extents shown on the Works Plan [AS-002] and [AS-003] define the maximum spatial extent of each Work Number rather than the actual footprint of the built substation infrastructure. As set out in the Design Principles, Parameters and Commitments [APP-213], the maximum compound area for each of the 400kV Project Substations is up to 3ha (BESS Site), up to 3.5ha (Sub-Site 5A) and up to 1.1ha (Sub-Site 1B), with a maximum height of up to 13m to the top of the busbars. The 400kV Project Substations fall within Work No. 3A as described in Schedule 1 of the Draft Development Consent Order [AS-032]. The associated landscape and biodiversity mitigation measures, including flower-rich pollinator mix, native hedgerow with trees and native linear tree belts, are secured within Work No. 7 and Work No. 10 and shown on the Green Infrastructure Strategy [AS-005] and within Appendix B of the Outline LEMP [APP-199]. The siting of the substation infrastructure at the detailed design stage will need to be undertaken in a manner that respects and accommodates the landscape measures committed to on the Green Infrastructure Strategy [AS-005], together with the minimum offset distances set out in the Design Principles, Parameters and Commitments [APP-213] (including 10m from hedgerows, 15m from individual trees, groups of trees and non-Ancient Woodland, and 15m from PRow) thus reducing the prominence of the infrastructure in the landscape. The commitments relating to the appearance of the 400kV Project Substations are also secured through the Design Principles, Parameters and Commitments [APP-213], which requires that the exact colour, subject to manufacturer specifications, will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Implementation of the landscape measures is secured through Requirement 7 (LEMP)	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				of Schedule 2 to the Draft Development Consent Order [AS-032] , with the design parameters and commitments secured through Requirement 5. The Applicant will continue to engage with the council to ensure that appropriate vegetation are proposed for mitigation planting around the Substation.	
SNDC LV - 21	Mitigation Embedded Mitigation Planting schedule	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] Outline LEMP [APP-199]	The planting schedules propose a species mix that appears overly prescriptive; replacement planting should instead reflect the original species composition or be tailored to site-specific conditions. Outline LEMP includes appropriate native and locally relevant planting schedules as well as the flexibility to review such lists against future scenarios influenced by climate change. See also SNDC-EB 18 for further comments.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities and indicative planting species for each typology. No planting schedules are included, as these details will be secured through the detailed LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft Development Consent Order [AS-032] . On the point of SNDC-EB18, the Applicant has adopted a precautionary measure to safeguard the species identified, through embedded design principles detailed within Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] . These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199] .	Under discussion
SNDC LV - 22	Residual Landscape Effect Significant Effect in LCA B1 Tas Tributary Farmland, LCA E2 Great Moulton Plateau Farmland	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]	As summarised in the ES Volume 1, Chapter 7, Landscape and Visual [APP-043] Table 7.14 the proposed development will result in the following significant effects in line with the LVIA's own methodology: - LCA B1 Tas Tributary Farmland – Moderate Adverse/Significant - LCA E2 Great Moulton Plateau Farmland – Moderate Adverse/Significant SNDC agrees with the LVIA that the effects on the above landscape character areas are significant but argues that underestimating the sensitivity of the	The likely significant landscape effects during the construction phase, Year 1 operation, Year 15 operation, and decommissioning phase are reported in ES Volume 1, Chapter 7 Landscape and Visual [APP-043] . The Applicant does not agree with this interpretation. The assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] concludes that: Effects on LCA B1 Tas Tributary Farmland and LCA E2 Great Moulton Plateau Farmland are	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			LCA's diminishes the scale of the effects, which should be major/moderate and adverse. SNDC LV-17 covers the understated level of effect on the single sites, largely because the LVIA underestimates the magnitude of impact associated with the change in land use that causes the loss of a key rural landscape, sense of tranquillity, and increased perceived human influence. Also, too much weight is given to the proposed landscape mitigation which will not offset these losses.	assessed as moderate adverse [significant] at both Year 1 and Year 15. - At Site 1 [which represents a small portion of LCA Great Moulton Plateau Farmland], landscape character and visual effects are assessed as major adverse [significant] at both Year 1 and Year 15. This therefore represents a localised effect of major adverse reducing to moderate effect for the wider LCA. - At Site 8 [which represents a very small part of LCA Tas Tributary Farmland], effects are assessed as major adverse [significant] at Year 1, reducing to moderate adverse [significant] by Year 15 as mitigation establishes. This therefore represents a localised effect of major adverse reducing to moderate effect for the wider LCA. The Applicant considers that, following the implementation of mitigation measures secured through the Outline Landscape and Ecological Management Plan [APP-199], residual landscape effects would generally reduce by Year 15, as planting and landscape proposals establish and mature, as set out in ES Chapter 7. The Applicant notes SNDC's position but does not agree that the sensitivity of the affected landscape character areas has been underestimated, nor that the resulting landscape effects should be assessed as major/moderate adverse. The assessment has been undertaken in accordance with the agreed LVIA methodology, including consideration of landscape susceptibility, value, magnitude of change and the influence of mitigation measures. The Applicant considers that appropriate weight has been given to the effect of mitigation planting at Year 15. While the Applicant acknowledges that significant adverse effects are identified for certain landscape character areas, it considers the conclusions presented in the LVIA to be proportionate and robust. The Applicant considers that the level of effect identified by SNDC reflects a difference in professional judgement regarding receptor sensitivity, the magnitude of change, and the effectiveness of mitigation.	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC LV - 23	Cumulative Assessment	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]	SNDC notes a concentration of large-scale energy infrastructure proposals and consents within South Norfolk and the wider Norwich area. These schemes must be considered in terms of their cumulative and in-combination effects as required by the EIA Regulations and the Planning Act 2008. A number of NSIP Solar Farms potentially coming forward within this part of South Norfolk; the recent pre-application for Tasway Energy Park for at 700MW Solar and BESS NSIP, together with consented and proposed TCPA schemes. Norwich to Tilbury National Grid NSIP which is about to be submitted formally for its Development Consent Order and the consented National Highways and Off-Shore windfarm NSIPs. The significant cumulative impact, these Projects and TCPAs will have on South Norfolk has not been adequately explored and is of serious concern.	The list of cumulative schemes assessed is provided in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116], which was agreed with the local authority. The Cumulative Landscape and Visual Impact Assessment [CLVIA] has been undertaken and is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The cumulative assessment identifies and considers existing, consented, and reasonably foreseeable developments that may give rise to cumulative landscape and visual effects when considered alongside the Scheme. The Applicant considers that the Norwich to Tilbury project is unlikely to interact with landscape and visual receptors in relation to the Scheme and is therefore scoped out of the cumulative assessment. Tasway has been placed on indefinite hold and is also scoped out, as described in SNDC CAE – 1. The council has agreed on the Applicant's position on SNDC CAE – 1.	Under discussion

3.6 Ecology and Biodiversity

Table 3.5: Ecology and Biodiversity

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EB – 1	Internationally Designated Sites & Nationally Designated Sites	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Shadow Habitats Regulation Assessment [AS-036]	SNDC agree with Natural England's comments (RR) on the Shadow HRA [APP-7.25] that is -subject to securing and implementing measures in the outline CEMP [APP-7.1], there will be no significant adverse effects. SNDC note Natural England have not commented on potential impacts to LNRs and encourage them to do so.	The Applicant notes this comment.	Agreed
SNDC EB-2	Non-statutory Designated Sites: County Wildlife Sites	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	The applicant states that measures secured via the DCO (outline CEMP, OLEMP and ODEMP), adherence with the Construction and Decommissioning Dust Risk Assessment, Flood Risk Assessment, and Outline Surface Water Drainage Strategy will ensure that the proposal will not have a significant effect on the two CWS within, or three CWS adjacent to the Order Limits. For transparency SNDC request that the Country Wildlife Sites should be listed in full in Table 8.14 of Chapter 8, and the citations provided as an appendix. It is requested that the impact assessment also considers potential impacts on the species/habitats identified in the citation. i.e. Lower Spring Wood CWS 107 includes 'The Spong' which, although not listed as such, is also likely to be ancient woodland and should be afforded a 30 m ancient woodland buffer and included in the AIA as ancient woodland (also see comment below regarding clarification as to the correct buffer). SNDC seek clarification as to the size of the buffer for CWS as Chapter 8 para 8.9.52 and 8.9.53 provide for a 15 m and 30 m buffer respectively). All documents should accord. SNDC await completion of the desk-based risk assessment looking at potential thermal impacts on the lowland fen habitats (irreplaceable habitat) at Fritton Meadows CWS.	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3	Under discussion
SNDC EB-3	Non-statutory Designated Sites: Roadside Nature Reserves	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	The EIA identifies four RNRs partially within the Order Limits, and three adjacent to the order limits. Subject to embedded mitigation in the OCEMP and PSMS, the EIA concludes the proposal will not have a significant effect on Roadside Nature Reserves. a) The RNRs are all located on single track roads so there is potential for over-running by vehicles which will damage/destroy the verges. SNDC request that over-running of RNRs on and near the site is considered as part of the EIA. Once this has been included in the ES,	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			measures to avoid these impacts will then need to be included within the oCEMP and oPSMS (they currently do not consider the risk of overrunning). b) Where RNRs are within the Order Limits a suitable (fenced) buffer should be provided, and detailed botanical surveys undertaken to establish whether additional measures need to be in place to protect habitats of RNR quality outside of the mapped RNR. c) Please can the applicant also confirm if road widening will affect the RNRs. d) For transparency it is requested that the Roadside Nature Reserves should be listed in full in Table 8.14 of Chapter 8, and citations provided as an appendix.		
SNDC EB-4	Irreplaceable Habitat – Lowland Fen	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	The EIA concludes that impacts to the lowland fen habitat will not be significant subject to embedded mitigation (which includes HDD) however additional assessment is being undertaken by the applicant regarding the potential for thermal effects on the lowland fen which may affect this conclusion. SNDC await the results of this assessment. It is noted that Natural England do not comment on lowland fen irreplaceable habitat in their relevant representation. SNDC would encourage NE to provide comment.	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 are only 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 Outline OEMP. Where relevant, the Outline CEMP will also be updated to reflect any design or construction requirements arising from the assessment process.	Under discussion
SNDC EB-5	Irreplaceable habitat- ancient woodland	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Arboricultural Impact Assessment [APP-150]	Ancient woodland has been assessed as being of county level importance (see Table 8.14 of Chapter 8). The EIA concludes that, subject to embedded mitigation during construction, operation and decommissioning, there will be a negligible – not significant impact. SNDC does not currently agree with this conclusion that during construction there will be a negligible: not significant impact:	The Applicant notes these comments and will continue to engage with SNDC on the matters. The AIA [APP-150] identifies the number of ancient woodlands located within 15m adjacent to the Order Limits while ES Volume 3: Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey [AS-017]	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			Please can the number of ancient woodlands adjacent to the DCO corridor be confirmed- the EIA identifies six ancient woodlands located adjacent to the DCO boundary (Ringer's Grove, Ringer's Wood) however AS-017 lists 10 sites. The impact assessment in the AIA (including Table 1.7) identifies where the buffer zones of ancient and veteran trees, and ancient woodlands conflict with the proposed scheme. The AIA states that no excavation works, digging or soil stripping will be undertaken within the RPA of ancient or veteran trees (para 1.5.23) Please can the applicant confirm that the same commitment applies to ancient woodland. There remains potential for additional ancient woodland to be present within and adjacent to the order limits so it is requested that the woodlands are assessed against the relevant criteria to establish whether there are any un-identified ancient woodland within/adjacent to the order limits so that it can also be appropriately buffered. SNDC request that 'The Spong' which is part of Spring Wood CWS be considered as ancient woodland (see CWS citation). It is requested that the oLEMP is amended to ensure that the erection of tree protection fencing is supervised by an Arboricultural clerk of Works. SNDC has requested a .shp file that informed the AIA because the scale makes it difficult to read.	includes a wider search area of 2km outside the Order Limits. The Applicant confirms that the same commitment for ancient or veteran trees applies to ancient woodland. It is understood that this comment relates to Lower Spring Wood CWS, which are not currently identified as ancient woodland through desk study and field survey, Arboriculturist supervision for the erection of tree protection fencing is secured through the Outline CEMP [APP-196]. However, this can be added to the Outline LEMP if required. A .shp file of the tree locations will be provided to SNDC for the identification of the tree locations.	
SNDC EB-6	Irreplaceable habitat- veteran trees and veteran hedge	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Arboricultural Impact Assessment [APP-150]	Veteran/ancient trees have been assessed as being of county level importance (see Table 8.14 of Chapter 8). The EIA concludes that, subject to embedded mitigation during construction, operation and decommissioning, there will be a negligible – not significant impact. SNDC does not currently agree with this conclusion. a) It is requested that notable trees/overmature trees are also treated as veterans and afforded the 15 m buffer as they will likely become future veterans especially given the 60 year time frame of the proposed solar farm (i.e. T26, T27, T33, T34, T38, T43, T44, T45, T46, T48, T49, T50, T59, T73, T75, T77, T79, T83, T88, T89, T90, T236, T239, T411, T414, and T493). b) The AIA also refers to a 'veteran hedge' (H52 (adjacent to The Spong' and adjacent to Lower Spring Wood CWS). This hedge will be avoided via Horizontal Directional Drilling. Given that there is no accepted methodology for identifying veteran hedges please can the applicant clarify whether there is potential for additional veteran hedges onsite.	a) The Applicant will apply the veteran tree buffer of 15 times stem diameter or 5m beyond the canopy edge for the notable trees listed, i.e. T26, T27, T33, T34, T38, T43, T44, T45, T46, T48, T49, T50, T59, T73, T75, T77, T79, T83, T88, T89, T90, T236, T239, T411, T414, and T493. b) The Applicant confirms there is no additional veteran hedges on site as most hedges within or adjacent to the Order Limits are categorised as BS category B or C and with relatively small stem diameters as compared to the veteran hedge identified (H52). The Applicant confirms there is no accepted methodology for identifying veteran hedges. The hedge was identified in the AIA as veteran through professional opinion and visual confirmation resulting from characteristics of stems including thickness and number of stems.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			c) SNDC are concerned that there are trees with veteran characteristics that have not been mapped e.g: d) Please can the applicant confirm if 100% of the order limits have been surveyed, and if further surveys are planned (a Preliminary AIA has been submitted in support of the application). Please see comments SNDC LV – 12 e) The Environmental Constraints and Key Features Plan [APP-62] should also include veteran trees and H52 (veteran hedge). The plan should also be at an appropriate scale so that it is legible.	c) Some trees do not have enough veteran characteristics to be qualified as veteran but recorded as notable. As mentioned in point a), the veteran tree buffer will be applied to these trees and being shown on the updated plans. d) The Applicant confirms 100% of the Order Limits have been surveyed in accordance with the survey methodology described in paragraph 1.1.2 within the Preliminary AIA [APP-150]. A further pre-construction tree survey is planned in Outline CEMP [APP-196] to inform the tree protection zones to be applied during construction. e) The Applicant acknowledges the Council's comment. However, the Environmental Constraints and Key Features Plan [APP-062] is intended to present the principal environmental constraints across the Scheme at a strategic level. The inclusion of all veteran trees and important hedgerows would result in an overly complex and less legible plan, reducing its effectiveness in communicating the wider environmental context of the Scheme. Veteran trees and important hedgerows have been considered at a site-specific level and have informed the evolution of the Scheme design where relevant. Information on the veteran hedge can be found in the AIA.	
SNDC EB-7	Trees	Arboricultural Impact Assessment [APP-150]	The arboricultural Impact Assessment does not plot the location of all the trees onsite. Furthermore, the EIA does not consider the impact on individual trees so it is not clear if the proposal will have a significant negative impact as a result of tree loss and. it is not clear whether that the RPAs have been considered in the design of the scheme. E.g. the access track from Frith Way immediately abuts the existing trees which are not mapped in the AIA. SNDC request that the AIA is amended to include all trees onsite. Any losses will need to be reflected in the BNG proposals.	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			The proposal involves re-positioning existing OHL towers associated with works to the National Grid Substation (Works No. 5). The limits of deviation of the towers have not been provided and the impact on trees from overhead line vegetation clearance has not been considered within the AIA (image below from the Norwich to Tilbury NSIP application). Significant earth Works at Hundred Lane will be required for the internal access track as this lane which will impact several trees. SNDC request that detailed topographical plans are provided and impacts on re-profiling of land is considered within the ES. Please can the applicant confirm whether CRC 1 will be HDD.		
SNDC EB-8	Arboriculturist supervision	Outline CEMP [APP-196]	It is requested that the oEMP is amended to ensure that the erection of tree protection fencing is supervised by an Arboricultural clerk of Works	The Outline CEMP [APP-196] includes arboriculturist supervision as the monitoring requirement for the erection of tree protection fencing.	Agreed
SNDC EB-9	CRC 1 and HDD	Outline Cable Route Construction Statement [APP/7.21]	Please can the applicant confirm whether CRC 1 will be HDD.	HDD will not occur in CRC 1, as outlined in Outline Cable Route Construction Statement [APP/7.21]	Agreed.
SNDC EB-10	Priority Habitat (Arable Field Margins, Native Hedgerows Ponds, Rivers Lowland Deciduous Woodland, Floodplain Grazing Marsh, & Lowland Fen (discussed under irreplaceable habitat)) Common and Widespread Habits of Low Sensitivity and or Ecological Interest		Priority habitats will be enhanced/created as part of the proposal, forming part of the schemes Biodiversity Net Gains. Where some NSIPs (such as highway schemes) will be retained in perpetuity, consent for the solar farm lasts for 60 years. Upon decommissioning the oDEMP notes the majority of land may be returned to arable use although the landowner may choose some areas of habitat and biodiversity mitigation and enhancement within the sites to be left in situ given they could contain protected species and may require licensing. Except for the National Grid Substation, SNDC considers that returning land to arable use could result in the potential loss of some 1128.63 habitat units, 260.03 hedgerow unites and 165.65 watercourse units [APP-218]. a) SNDC consider that on a precautionary basis the potential loss of priority habitats upon decommissioning should be assessed as significant. b) SNDC consider that on a precautionary basis the potential loss of Common and Widespread Habits of Low Sensitivity and or Ecological Interest - namely modified grassland -	The Applicant notes these comments and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			should also be assessed as significant as a result of decommissioning. c) Please can the applicant confirm whether the land will be freehold or leasehold. d) It is also requested that the oDEMP include provision for the details for the retention of habitats post decommissioning and include a timetable for works (adjoining sensitive periods such as bird nesting period, reptile hibernation period).		
SNDC EB – 11	SNDC key concerns	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219] Lighting Strategy [EN0110014/APP/6.3.7.11].	SNDC's concerns relate to the potential loss and fragmentation of habitats and the resulting impacts on protected species and biodiversity. a) Habitat fragmentation resulting from artificial lighting at night on roosting bats during construction, operation and decommissioning, is considered Chapter 8. Method Statement 4: Construction Phase Lighting (in Outline Protected Species Mitigation Strategy [APP-161]) sets out measures to avoid/minimise impacts to bats from lighting [see APP- 161]. However, the Lighting Strategy is not sufficiently detailed and has not been informed by the results of the bat surveys e.g. it does not identify dark corridors or buffers. Fragmentation caused by removal of hedgerows/linear features is not explicitly considered in Chapter 8 [APP-044] or the Outline Protected Species Mitigation Strategy [APP-161] however Chapter 4 – The Scheme [APP-040] notes the dimensions for cable trenching will vary and goes on to state that the working width of the CRC would be 'typically 25 m wide and will narrow at hedgerow crossings', and that internal access will utilize existing gaps, and will need to be a maximum of 6 m wide (10m is quoted elsewhere). The Outline Protected Species Mitigation Strategy [APP-161] also advises the potential for localised removal of sections of hedgerows as required for access and visibility and Chapter 4 however the extent of this has not been identified. Details of the CRC are contained within the Outline Cable Route Corridor Statement [APP -7.21] – noting the what the width of gaps in hedges for the CRC appear to be 13 m [APP-7.21].	Impacts to Ecology and Biodiversity have been avoided by the inclusion of embedded mitigation as set out in Section 8 of the Outline Construction Environmental Management Plan [APP-196], and an Outline Protected Species Mitigation Strategy [APP-161] both of which will be adhered to prior to and during construction. Methods include the establishment of buffer zones between protected sites, priority and important habitats and important ecological features, including ancient trees, woodland, hedgerows, watercourses and ponds; pollution controls and refuelling and chemical storage requirements; a surface water management plan, the employment of an ECoW, and the delivery of toolbox talks. The operation of the Scheme will mitigate impacts to habitats and species through the Outline LEMP [APP-199] which will include enhancement measures for habitats including planting, seeding; better management and monitoring as well as the erection of bat boxes all which will serve to improve habitat networks. The Applicant notes the further comments and the matter will remain under discussion and be updated at Deadline 3.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			Please can the applicant clarify: - what measures will be put in place to maintain connectivity for commuting bats during construction and hedge establishment, and - that hedges will be re-instated were removed for access, temporary visibility splays, and internal roads. It is requested that instant hedges (2m+ in height) are used to minimise the time required for hedges to mature. b) The Design Principles, Parameters and Commitments document [APP 7.18] considers fencing and security. SNDC requests that consideration needs to be given to the provision of (effective) access for mammals on sites for solar PV arrays such as badgers and large deer species to prevent fragmentation of habitats occurring. For larger mammals consideration needs to be given to avoiding long runs of continuous fencing.		
SNDC EB- 12	Hedgerow Regulations Assessment	ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	RR SNDC notes that no explicit Hedgerow Regulations Assessment has been completed or submitted as part of this DCO and has significant concerns regarding the approach taken to identifying important hedgerows. APP-119 states that in the absence of an Important Hedgerow Survey, it has been assumed that there are a number of Important Hedgerows across the Order Limits, with Section 5 indicating that this assessment is based solely on ecological value. This approach excludes hedgerows that may be important for historic reasons (e.g. pre-enclosure field systems). SNDC is therefore concerned that the full implications for important hedgerows have therefore not been assessed and considers this information is essential to inform the Examination. Accordingly, the Council requests that the submission of a Hedgerow Regulations Assessment is provided to the Examining Authority, to ensure that all important hedgerows are properly identified and assessed prior to the determination of the DCO. Confirmation is required as to whether all “important” hedgerows have been identified. The Council considers that there may be systemic omissions of certain categories (see above) and failure to identify or survey hedgerows that may meet the criteria for importance. Following further review of the ES, SNDC are satisfied that an adequate assessment of hedgerows has been undertaken between historic and ecological important hedgerows.	Identification of possible historic hedgerows was included within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [APP-169]. A number of Important Hedgerows (as defined within Hedgerow Regulation 1997) within the Order Limits, are shown in Hedgerow and Tree Protection Order Plan [AS-004]. Whilst an Important Hedgerow assessment was not carried out to define ecological importance, the majority of hedgerows within the Order Limits are considered important due to their heritage value. Taking a precautionary approach within the Landscape and Visual Impact Assessment presented within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] the Applicant has considered that hedgerows are important with heightened value, which influences the overall sensitivity of the landscape resource as defined in ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]. The UKHab surveys identified hedgerows as qualifying as priority habitats under Section 41 of the NERC Act 2006 and considered to be habitats of principle importance for nature conservation.	Agreed

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				Therefore, their importance is established in the assessment of this resource. The Applicant considers that the additional identification of important hedgerows (from an ecological perspective) would not materially inform the assessment or design process and would not alter the conclusions of the impact assessment process. The design approach has sought to minimise impacts to hedgerows and the identification of importance under the hedgerow regulations would not alter the approach taken, in that hedgerow's loss is only identified where no alternative solution is possible.	
SNDC EB- 13	Commitment to Biodiversity Net Gain (BNG)	Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219] Outline LEMP [APP-199],	RR SNDC expects all developments to take every reasonable opportunity to enhance biodiversity and deliver a measurable net gain for nature. This requires strict adherence to the mitigation hierarchy i.e. avoidance, minimisation and compensation and should be supported by robust biodiversity net gain measures. NPS EN-3 advises that solar schemes need to maximise biodiversity enhancements. Can the applicant provide evidence as to how the biodiversity enhancements have been maximised and informed the design of the project.	Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Scheme's adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the Biodiversity Net Gain Statutory Metric [APP-219]. On the basis of the above it is considered that the biodiversity gain hierarchy has been correctly applied in relation to the Scheme and the BNG assessment. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199].	Under discussion
SNDC EB – 14	Commitment to BNG	Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219]	RR SNDC requests an Excel version of the metric for review, together with copies of the condition assessments. Please can SNDC request be provided with an excel copy of the metric and condition assessments.	Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. This has included the calculation of habitat baseline values and post-construction values provided within the Biodiversity Net Gain Statutory Metric [APP-219], whilst initially provided in pdf format, the original metric can be provided to SNDC in Excel format along with the associated habitat condition assessments, the latter being of a very large file size and unsuitable to append to the Biodiversity Net Gain Report [APP-218].	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The conditions assessment will be submitted at Deadline 1 as Biodiversity Net Gain habitat condition assessment data [EN0110014/EXAM/9.24]. The requested metric, as well as the conditions assessment, have been provided to SNDC on 06 October 2026.	
SNDC EB - 15	Commitment to BNG and consideration of the LNRS	Design Principles, Parameters and Commitments [APP-213] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219] ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059]	RR SNDC also strongly encourages alignment with the Local Nature Recovery Strategy (LNRS) (adopted October 2025) and the Norfolk Local Habitat Map to inform the BNG strategy and best practice guidance to ensure appropriate post-construction management of BNG. EN3 advises applications to consider any reasonable opportunities to maximise restoration, creation and enhancement of wider biodiversity which may include considerations and opportunities identified through the LNRS, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan. a) SNDC acknowledge use of the Norfolk Habitat Map when developing the ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059]. For transparency SNDC ask that these areas are explicitly identified on the Indicative Masterplan (APP-059). b) It would also be helpful to understand where it was not possible to incorporate habitats proposed by the Norfolk Local Habitat Map, and why. .	Whilst the Scheme's design evolution has progressed prior to the publication of the LNRS (and associated Local Norfolk Habitat Map), the embedded design principles adopted and detailed within Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets. Where possible, areas of land shown in the Norfolk Local Habitat Map located within the Order Limits designated as 'areas that could become of particular importance' (ACB) have been targeted with their suggested habitat type in the LNRS 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
SNDC EB - 16	Commitment to BNG	Outline LEMP [APP-199] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219]	Typically, for TCPA planning applications, there is a commitment to monitor the delivery of BNG measures over a 30-year period in line with the biodiversity gain condition under the Environment Act. This includes preparation of monitoring reports at defined intervals to demonstrate the ongoing delivery and maintenance of BNG. The Council therefore seeks clarification on the monitoring arrangements, including the frequency and content of monitoring reports, the body to which these reports will be submitted (for example, the LPA or the Planning Inspector). This is necessary to ensure that the BNG targets are being achieved, reported on transparently and maintained. NPS EN3 advises applicants to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any ecological receptors such as bats and wintering birds).	There is no legislative requirement for the Scheme to provide quantifiable BNG, including no legislative requirement to commit to monitoring the delivery of BNG measures. However, the Applicant has provided outline commitments to post-developing monitoring, detailed within the Outline LEMP [APP-199]. The exact monitoring specifications will be detailed in the LEMP (secured by Requirement 7 of the Draft DCO [AS-032]) and updated as appropriate in subsequent iterations, to be reviewed and updated every five years through the operational lifetime of the Scheme. Table 4.1: Outline Management Schedule of the Outline LEMP [APP-199] details proposed	Under discussion

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			Results of the monitoring will then inform any changes to the land management of the site. While monitoring is included in the Outline Landscape and Ecological Management Plan it refers to measures to establish, for example, the success (or otherwise) of planting measures and checking bird boxes. Monitoring also needs to be undertaken to establish whether the newly created and restored habitats are on track to achieve the expected condition assessment in the time scales expected or whether management needs to be adjusted e.g, that grasslands of medium high distinctiveness has a high proportion of characteristic indicator species, sward height is varied and bare ground does not exceed 5%. The final monitoring report (in year 30) would be expected to demonstrate that the required condition assessments have been achieved, or if not, what will be done to ensure the scheme achieves the anticipated net gain. a) SNDC request, in line with EN3, that monitoring intervals to ensure habitats are on track to reach their required condition assessment, are identified as part of the Outline LEMP and not left to DoC, as all LEMPs submitted to discharge Requirement 7 must be substantially in accordance with the outline landscape and ecology management plan. For TCPA applications we would normally secure monitoring intervals of 1, 2, 3, 5, 10, 15, 20, 25 and 30 years and would suggest a similar approach. b) The monitoring schedule should also be reflected in the DCO along with submission of the monitoring reports to South Norfolk District Council within 6 months of completion of the surveys. In year 30, the final monitoring report needs to confirm that the minimum BNG has been achieved. This is necessary to ensure that BNG targets are achieved. c) In line with recently published NSIP: biodiversity gain statement for energy (https://assets.publishing.service.gov.uk/media/6a185a1765bc5f798327f4c5/biodiversity-gain-statement-for-energy.pdf) the LEMP would also be expected to cover management for the lifespan of the development (60 years).	monitoring activities, specific to the landscape/ecological feature in question. Following from each monitoring activity, a monitoring report will be submitted to SNDC, which will include any remedial actions undertaken to ensure targeted habitat condition assessment is achieved.	

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SNDC EB-17	Biodiversity Net Gain	Draft Development Consent Order (Revision 2) (Clean) [AS-032] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219]	Requirement 9 of the DCO relates to the Order Limits however it is only proposed to deliver BNG within the Sites/Sub-sites (not the CRC). Habitats within the CRC will be returned to their pre-development condition. a) Requirement 9 should be amended to relate to the Sites/sub sites only, with a separate requirement secured to provide written evidence to the LPA that habitats within the CRC have been restored to their pre-development condition within the two years of beginning construction. b) In line with the DCO requirements for Botley Solar Farm, and Fenwick Solar Farm it is requested that the Requirement 9 of the DCO specifies the % BNG to be delivered rather than 'a minimum of 10% BNG for habitats, hedgerows and watercourses. It is acknowledged that the CRC will be returned to the landowner within 2 years, following completion of the undergrounding works. Habitats within the CRC will be returned to their original condition. It is suggested Requirement 9 is amended to read: <i>'(2) The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 44.22% biodiversity net gain in habitat units, a minimum of 34.71% biodiversity net gain in hedgerow units and a minimum of 17.52% biodiversity net gain in watercourse units for the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached.</i> (figures taken from statutory metric for 'sites' only).	The Applicant notes these comments and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion
SNDC EB - 18	Protected Species – Bats: European Protected Species licence	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] 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].	SNDC agree that a protected species mitigation licence is not required with regards to impacts on bat habitats.	The Applicant acknowledges the presence of Barbastelle Bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific	Agreed

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				mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would: (a) impair their ability— ➤ to survive, to breed or reproduce, or to rear or nurture their young; or ➤ in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) affect significantly the local distribution or abundance of the species to which they belong.	
SNDC EB – 19	Protected Species – Barbastelle bats: Core Sustenance Zones (CSZ)	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3. Appendix 8.6 - Bat Activity Survey Report [APP-157] Appendix 8.10 Outline Protected Species Mitigation Strategy [APP-161].	SNDC references maternity colony data provided by the Norfolk and Norwich Bat Group whose Core Sustenance Zones (CSZ) overlap the Order Limits. The Council consider that there may potentially be other ancient woodland adjacent to the order limits that have not been subject to survey by the above-named group, and conclude that these woods are also likely to be used by Barbastelle bat maternity colonies. The 30m buffer applies only to ancient woodlands identified on the ancient woodland inventory. There are likely to be other woodland within/adjacent to the site that also date back to the 1600s, but that have not been mapped as ancient woodland. One	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. The Applicant agrees that there are potentially other woodlands in the wider landscape, and outside the Order Limits, that support further colonies of	Under discussion

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			example is the Spong (adjacent to Spring Wood CWS). The citation suggests The Spong is of ancient origin but this has not been considered (see EB-5). a) It is recommended that woodland adjacent to the Order Limits which is also shown on the 1st Edition Ordnance Survey maps of Norfolk (c.1879–1886), the earliest accessible mapping available, is afforded the same 30 m buffer. This assumes that such woodland may also qualify as ancient woodland, despite being less than 2 ha in extent.	Barbastelle bats. 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 a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits and will include habitat creation within these buffer zones. This will reduce the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing lo enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species' favourable conservation status. The Applicant notes further comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB – 20	Protected Species – impacts upon individual bat species based on current research	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [APP-152] 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]	SNDC present their concerns regarding research which indicates that solar sites can have a significantly negative effect on bats, resulting in a notable decrease in bat activity at both the centre of solar farms and along adjacent boundary features. Avoidance Behaviour- Operation Two studies have recorded fewer bats within solar farms in comparison to control plots (Szabadi et al., 2016; Tinsley et al., 2023), so while there may be criticisms of the (peer reviewed) the Tinsley study it is not alone in identifying potential avoidance of solar farms by bats, and it was also considered as part of the Botley Solar Farm ES (see Representation by Natural England 15/1/2025) noting that bats may currently commute across open ground could be prevented from doing so post construction i.e. through fencing or panel avoidance (see REP4-072 – Natural England's Responses to Examining Authority's Second Written Questions (ExQ2)). Additional surveys were undertaken at Botley which led to the inclusion of bat buffers of 25m, 10 m and 5m (see Botley West Bat Technical Note [REP6-044] (noting that NE did not support a 5m buffer) Due to the scale of the scheme the bat surveys undertaken at East Pye sampled some key landscape features to gain an understanding of the general level of bat activity and likely	The Applicant acknowledges the Council's comment regarding research on the relationship between bats and solar farms. Whilst the Council do not reference this specific research material, the Applicant assumes that this comment is received in relation to Tinsley et al (2023)¹, which claims to show a strong negative effect of Solar PV developments on foraging and commuting bats. However, there are several caveats which suggest that this study is not overly reliable, such as the standardised height of the detector microphones (1.27m) is about the mid-height of a typical solar panel and it is expected that solar arrays reflect and scatter sound (including bat calls) so a microphone at this height surrounded by panels should detect fewer calls than one in an open spaces even if bat activity is similar. These caveats are summarised within BSG (2026)².and the findings of this study have been challenged. Conversely, other academic studies have also emerged recently which indicate the benefit of Solar PV sites for bat species. More guidance will be published on bats and solar PV sites, as presently, the Bat Conservation Trust are	Under discussion

¹ Tinsley, E.; Froideveaux, J.S.P.; Zsebők, S.; Szabadi, K.L.; and Jones, G. (2023). Renewable energies and biodiversity: Impact of ground- mounted solar photovoltaic sites on bat activity. Journal of Applied Ecology 60, 1752–1762.

² BSG. (2026). Do solar farms affect foraging & commuting bats? Available at: <https://bsg-ecology.com/bats-and-solar-farms/>

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			assemblages present. The surveys were not comprehensive enough to identify key flight lines, key foraging areas, or identify hedgerow trees and woodland edge roosts to inform the design to avoid affecting bats and their roosts. It is noted that transects were not undertaken on all Sites/Sub sites and the CRC was not surveyed at all for bats. There are areas where no surveys were undertaken at all. Given the time of year additional bat surveys cannot be completed prior to the end of examination. It is also not clear how the results of the bat surveys have informed the design or the avoidance/mitigation strategy. a) In lieu of additional surveys SNDC requests that all existing landscape features including hedges, lines of trees, watercourses and arable field margins are assumed to be important for commuting bats and wide 25m buffers applied. Where these intersect with the 30m ancient woodland buffer the larger buffer applies. b) SNDC agree that bats will potentially benefit from habitat creation and caseation of the use of herbicides and pesticides however SNDC do not agree that there will be a moderate beneficial – Significant effect during operation given the uncertainty over impacts from avoidance. Should there even a minor adverse significant effect, given the scale of the scheme and importance of the area to barbastelle maternity colonies, any altered behaviour could be detrimental to the Annex II bat populations should they not utilize the site as they had before. As NE noted in the SoCC for Botley Solar Farm providing wider buffers/omitting key links and supporting habitat from PV panels, would help ensure there is sufficient habitat to allow ecological functionality to remain (Statement of Common Ground- Natural England [REP7-040]) c) Monitoring can then be undertaken to establish if the buffers are successful although this will require a better baseline against which to monitor against. Details of monitoring (i.e. in years 1, 2, 4, 6 and 10 of operation) should be included within the oLEMP and secured via the DCO.	currently working with Natural Resources Wales (NRW) to provide a comprehensive synthesis of the available evidence on the interactions between solar energy developments and bat populations. To inform the assessment included in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] the Applicant has undertaken a desk study, ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152], and sought to understand the assemblage of bats through the ES Volume 3, Appendix 8.5 - Ground Level tree Assessment Report [APP-156] and the ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]. To safeguard the species identified, the Applicant has adopted a precautionary measure, through embedded design principles detailed within Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species).	

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				The Applicant notes further comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB - 21	Protected Species – Barbastelle Bats additional surveys	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] 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]	SNDC requests that additional bat activity surveys of woodland adjacent to the scheme are undertaken to inform an addendum to the EIA, with specific consideration given to the potential presence of Barbastelle maternity colonies in woodlands adjoining the order limits a) Please can the applicant elaborate on what embedded design principles are included for bats within the Design Principles, Parameters and Commitments [APP-213] as they are not explicitly stated anywhere within the application. i.e. it is not clear how the results of the bat surveys have informed the design e.g. Site 6, subsite 7J and Sub site 1A were found to have the highest Bat Activity Index (BAI) but it is not clear how this has fed into the design of the GI Masterplan (site 6 is to be used for skylark mitigation but no consideration is given to bats) – it will also support a CRC compound). It is also not clear and or how the scheme has been designed to improve poorer areas (e.g. sub site 2c, 8B, 7C, (close to 7J) and connectivity to and from them. Consideration should also be given to improving connectivity between existing key commuting routes, and woodland known/suspected to support barbastelle maternity colonies, and ensuring connectivity with new woodland/ tree belts. CSZ have been mentioned, but again it is not clear how this has influenced the design. b) SNDC would encourage Natural England to provided further comments on bats noting that they only comment on licensing in their RR. c) SNDC would note that at Botley Solar Farm additional surveys were undertaken because the baseline surveys were not considered adequate. As a result of these surveys wider buffers were included as part of the scheme i.e. Tier A buffers of 25 m corridor were located on key flight lines and features that the additional bat surveys work had identified as critical to the bat assemblages which included main hedgerow flight lines (currently hedges have a 10m buffer) as well as key locations. Planting proposals were also designed for the benefits of bats. Given that surveys cannot be completed before the end of the examination SNDC request that the 25m buffer (proposed at Botley Solar Farm) is adopted for all existing	The Applicant disagrees that further targeted woodland surveys are required, due to the provision of embedded design principles in Design Principles, Parameters and Commitments [APP-213] that benefit woodland roosting bats present within the Order Limits and wider environment. If surveys were undertaken upon woodlands outside of the Order Limits, and bat roosts were confirmed/suspected, the appropriate mitigation/enhancement measures that would be recommended have already been designed into the Scheme design process (see above) to benefit these roosts, and therefore, the conclusion of the ecological assessment in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and supported by surveys detailed in ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] the process would remain unchanged. In their Relevant Representation [RR-1410], Natural England do not request further protected species surveys). Given an ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] has been provided, it is not considered justified or proportionate to undertake further precautionary surveys. The Applicant acknowledges the presence of Barbastelle Bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular tilling, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with	Under discussion

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			linear/boundary features on the assumption they are important for bats.	adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the Scheme considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrate on ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows / ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: a) to impair their ability— ➤ to survive, to breed or reproduce, or to rear or nurture their young; or ➤ in the case of animals of a hibernating or migratory species, to hibernate or migrate; or b) affect significantly the local distribution or abundance of the species to which they belong. The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly	

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				stating that the Order Limits occupy land within these CSZ's. The Applicant agrees that there are potentially other woodlands in the wider landscape, and outside the DCO limits, that support further colonies of Barbastelle bats. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status. The Applicant notes the comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB - 22	Protected Species – Barbastelle Bats – Scheme design	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] 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]	In their relevant Representation, SNDC request that solar panels are avoided on sites and sub-sites where they immediately abut woodland to minimise potential impacts to bats and especially barbastelle maternity colonies. Greater consideration should also be given to improving habitat within the site for Barbastelles through increasing edge habitats (scalloped edges to new woodland planting). Following a meeting with the applicant on 21 and 22 September 2026 it is understood that the typical 15 m ancient woodland buffer was extended to 30m, and the typical 5 m hedge buffer was extended to 10m with the intention to maintain connectivity for bats. SNDC requested that this be made explicit within the application (e.g. Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 – Indicative). SNDC request that further consideration is given to the GI strategy to ensure that water bodies remain open on 2/3 sides to	The Scheme design evolution has included 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] which are designed to avoid impacts upon surrounding woodlands and include for a minimum of 30m buffer of all ancient woodlands and 15m buffer of other woodlands immediately adjacent to the Order Limits. Offsets to ponds (30-50m), watercourses and ditches (at least 10m) are also included in the design parameters to support foraging and commuting bats by maintaining habitat networks. A broad range of habitat enhancements are recommended within Outline LEMP [APP-199], including the creation of woodland edge habitats, creating and managing grasslands and reinstating	Under discussion

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			enable access for bats (the current GI strategy suggests enclosing several ponds with trees and scrub)	ghost ponds. This will reduce the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species' favourable conservation status. The Applicant notes further comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB - 23	Protected Species – White-clawed Crayfish	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP-160]	SNDC has previously identified that a breeding population of White Clawed Crayfish is present in the River Tas, which remains as one of the few Norfolk Strong holds for this species. The Aquatic Habitat Assessment Report [APP-160] states that White Clawed Crayfish are unlikely to be present, as no field signs were observed. However, this conclusion appears to be based on habitat suitability rather than on presence/absence surveys. The Applicant has submitted a detailed response to PINS (Procedural Deadline A). [PDA-007]. Following a meeting on 21 & 22 September 2026 the applicant has advised SNDC that Natural England have not raised any concerns. Pending sight of Natural England's SoCG.	No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed Crayfish was undertaken with the findings in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160] . Measures to control pollution to watercourses are set out in the Outline CEMP [APP-196] , the Outline OEMP [APP-197] and the Outline DEMP [APP-198] . Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for main rivers and watercourses to prevent pollution. Also, as per Outline Cable Route Construction Statement [APP-216] , where cables cross rivers, the Applicant is also committed to a minimum cable depth of 5m below the surveyed bed of main rivers. HDD trenchless solutions will be employed when crossing the Hempnall Beck, thereby avoiding any temporary impacts upon White Clawed Crayfish populations. In their Relevant Representation, Natural England do not request further protected species surveys, including for white-clawed crayfish. Notwithstanding, the Applicant notes the Examining Authority's (ExA) request for further information and potential for surveys to be carried out for White Clawed Crayfish between July – September, in the Rule 6 Letter [PD-005] . The Applicant will provide an update on this at Procedural Deadline A . If in the unlikely event that the species was recorded within watercourses within the Order Limits, adopted	Under discussion

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				precautionary avoidance measures already mitigate impacts upon the species, and as a consequence the impact assessment conclusions would remain unchanged, The Applicant notes further comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB - 24	Protected Species – Bat and Bird Collision Risk and displacement	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	SNDC considers that the assessment should address potential collision risks to birds and bats associated with the solar panels, as well as potential attraction, displacement and barrier effects on movement, which are distinct from habitat fragmentation effects associated with habitat loss. SNDC acknowledge risk of bats and birds colliding with solar farms is low, but not impossible, and we have not claimed the risk is significant, just that it should be considered with measures in place to reduce potential effects (e.g. panel design and anti-reflective coatings). It is noted that since the publication of the Natural England's report two additional studies have identified collision risk in bats. Consideration should also be given to monitoring of casualties. Following a meeting on 21& 22 September the applicant is sending SNDC additional research. The applicant also advised that Natural England have raised no concerns in the SoCG. Pending.	An assessment of breeding birds is provided in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. With the exception of skylarks, it was agreed with the Planning Inspectorate (ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114]) to scope out assessment of impacts on breeding birds during the operational phase of the Scheme. Measures to avoid impacts on skylark and other ground nesting birds are included in ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161] and consideration of breeding birds in the long-term management of the green infrastructure of the Scheme is included in the Outline LEMP [APP-199]. The Applicant disagrees that Solar PV (in an arable landscape setting) presents a significant collision risk to birds/bats. The Natural England publication '<i>Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology (NEER012)</i>' states that '<i>incidental and informal evidence suggests that the collision risk presented by solar panels to birds is low but not impossible. It is likely that the infrastructure associated with transporting electricity (e.g. powerlines) presents more of a collision risk for birds than the solar arrays themselves. With regards collision risk to bats, there is no evidence</i>'. The Scheme does not propose any significant increase in overhead lines (which are already present within Site 1 (proposed National Grid point of connection)). In addition, research by scientists from the RSPB and University of Cambridge (Copping J P et al. 2025) as part of the Centre for Landscape Regeneration found that (hectare for hectare) solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than	Under discussion

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				surrounding arable farmland. With (appropriately managed) solar farms having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland. This suggests that collision risk or displacement is not a major factor in limiting bird species abundance and numbers. The Applicant will send SNDC the aforementioned additional research.	
SNDC EB-25	Protected Species - Badger	6.3.8.7 Environmental Statement Volume 3: Appendix 8.7 - Badger Survey Report (Revision 1) - Confidential [APP-158] Appendix 8.10: Outline Protected Species Mitigation Strategy [EN011 0014/APP/6.3.8.10], Design Principles, Parameters and Commitments (Revision 1) [APP 213]	Badger surveys were undertaken between April and September 2025, April 2025, and August and September 2025 at this time of year vegetation will limit detection of setts. It is therefore considered likely that additional setts are present but not identified – the impact on badgers during construction could therefore be significant. It is requested that surveys are undertaken at an appropriate time of year (over winter). SNDC are supportive of the proposed 30m buffer of active and inactive setts which would be secured as part of the Outline Protected Species Mitigation Strategy [APP-161]. The oPSMS also indicates a licence may be required for badgers but it is noted (meeting 21&22 September that NE have accepted the proposed approach to licensing). The mitigation strategy includes strategic gaps beneath fencing for badgers to avoid fragmentation and blocking access to setts. It is requested that details (size and locations) for gaps within the perimeter fencing be included within the oPSMS and Design Principles, Parameters and Commitments [APP-213] as no provision is made within the DCO for their subsequent approval. Has consideration also been given to the timing of works in CRC/Sites/Sub-sites where main setts are known, to avoid sensitive times of year (e.g. avoiding construction when cubs are born). The information within the badger report is presented in such a way that you need to refer to the indicative masterplan to identify the Site/sub site numbers/CRC numbers. It is not readily accessible. Although it does not affect the outcome, it is not possible to work out which setts are which from the information in the badger report.	The Applicant notes these comments and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB – 26	Protected Species – Great-crested Newt	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]	The Outline Protected Species Mitigation Strategy [Appendix 8.1 [App-161] proposes that works will be undertaken under a Great Crested Newt Precautionary Method Statement on the basis that the scheme is unlikely to result in a legal offence. While this is not	The Great-crested Newt (GCN) mitigation strategy addresses likely impacts upon GCN. This species has been assessed within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] following	Under discussion

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		ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161] ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy (OSPMS) [APP-161]	an uncommon approach for a solar NSIP, however, SNDC has concerns that it appears to address only impacts associated with site clearance and does not adequately assess impacts arising from the loss of habitat associated with permanent infrastructure, such as the substations. Chapter 8 of the ES advises GCN are present within 6 ponds within the order limits and assumed to be present within a further 6 ponds. Table 3.5 of ES Volume 3 – Great Crested Newt Survey Report [APP-154] however only lists GCN as present within 5 ponds within the order limits: Ponds 21, 43, 56, 57 and 62. Please can the applicant confirm which is the 6th pond confirmed as supporting GCN within the order limits. In a meeting on 21-22 September 2026 the applicant confirmed it is 5 ponds and that 6 is a typo. SNDC request that documents re reviewed for typos as those secured as part of the DCO need to be accurate. In a meeting on 21-22 September 2026 the applicant confirmed that Natural England have accepted the proposed approach. Pending subject to sight of NE's SoCC. Upon decommissioning impacts will include the removal of habitat within 50m of ponds. It is noted that GCN surveys will be undertaken to inform decommissioning however the loss of habitat within 50m of ponds, which will generally be of benefit to the GCN will be removed. Impacts associated with decommissioning are therefore considered by SNDC to be adverse- significant.	surveys which are detailed in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161]. The Applicant has considered the impacts to GCN as part of the embedded design set out in Design Principles, Parameters and Commitments [APP-213] with 50m buffers being applied to ponds which support GCN and 30m of all other ponds where GCN were absent. The 'permanent infrastructure' referred to by the Council is proposed within sub-optimal open agricultural land, land which is currently subject to intensive agricultural activities which are not conducive to supporting GCN populations. Nevertheless, such 'permanent infrastructure' is still positioned beyond 50m (often a lot further) from existing (or presumed) GCN ponds. Therefore, the impact of such of such 'permanent infrastructure' locations on the GCN is considered to be negligible. Should it be ascertained that a licence is required then it will be sought from Natural England in accordance with ES Volume 3, Appendix 8.1 Outline Protected Species Mitigation Strategy [App-161]. In their Relevant Representation, Natural England do not request further protected species surveys, including for great crested newt, rather they provide advice on the licensing approach and use of the Discretionary Advice Service (DAS). The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3. At Deadline 1 the Applicant is submitting an updated Appendix 8.3 – Great Crested Newt Survey Report [APP-161].	
SNDC EB - 27	Design and Avoidance Measures impacts on Ecology	Design Principles, Parameters and Commitments [APP-213] ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059]	The Council requests that all ponds are subject to a minimum by 50 metres buffer, irrespective of the presence of GCN, as this species may not consistently occupy the same ponds from year to year. Following a meeting on 21 and 22 September 2026 SNDC agree the 30 and 50 m are only a construction buffer. and that habitats	As a precautionary measure, the Applicant has adopted 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] which provide for a 50m buffer zone surrounding GCN	Under discussion

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		ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161] Outline LEMP [APP-199]	within the site will be improved for GCN following completion of construction. The applicant also noted NE had agreed the proposed approach. SNDC await sight of NE's SoCC which is to be submitted at Deadline 1. Environmental statement 2nd addendum - ch. 7 – biodiversity (2018/0111) and ES addendum technical appendices - ch.7 biodiversity contains the results of GCN surveys 2020 submitted in support of the Long Stratton Bypass scheme (HSIs from 2015). Please note where you have identified pond 190 this is in fact two ponds adjacent to each other (identified as ponds 14 (HSI Good) and 15 (HSI excellent) in 2018/0111 application). The 50m buffer would theoretically not be impacted. With regards to the last note about contributing towards the species' favourable conservation status locally SNDC would note that operational impacts on GCN were scoped out	ponds and 30m surrounding ponds found not to contain GCN. Whilst it is acknowledged by the Applicant that following surveys detailed in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161]. GCN could potentially colonise additional ponds in the future, presently these are GCN negative, in many cases due to unsuitability (water depth, lack of aquatic/margin vegetation etc) and unlikely to be colonised without intervention, therefore, the Applicant proposes to maintain the current approach to pond buffers. It should be noted that the Outline LEMP [APP-199] proposes enhancements to existing ponds, the creation of new ponds, and the establishment of more suitable terrestrial habitat (improved grasslands rather than agricultural land) therefore, post-construction aquatic opportunities for GCN will be increased, thereby contributing towards the species' favourable conservation status locally.	
SNDC EB - 28	Design and Avoidance Measures impacts on Ecology	Outline LEMP [APP-199]	Details of the proposed hedge species mix are provided in Table 3.4 of the Outline Landscape and Ecological Management Plan (OLEMP) [APP-199]. However, SNDC has concerns regarding the suitability of the proposed species and their compatibility with local habitats. Goat Willow, proposed as a hedging plant does not appear to be present within on-site hedgerows and is not typically characteristic of hedgerows within the Claylands. Similarly, white Willow trees within hedges are not recorded within hedges onsite and are not representative of typical hedge trees in the Claylands landscape. SNDC therefore queries whether appropriate regard has been given to 'Planting Hedges in Norfolk- Maintaining Regional Character' published by Norfolk County Council which provides guidance on suitable hedge species mixes for the South Norfolk Claylands in which the site is located. • See also EMC LV-18 • To be reviewed following update to the Outline Landscape and Ecological Management Plan- the LEMPs discharged under Requirement 7 of the DCO need to include species list that are specific to the application and local area. Applicant to provide additional information with revised oLEMP.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline indicative planting species for each typology. These are not definitive lists and planting schedules are not included, as these details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-012]. The Applicant notes the comments and will include an updated indicative species for hedgerows in a future iteration of the Outline LEMP [APP-199] to be submitted at Deadline 1.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EB - 29	Adequacy of Surveys	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161]	As part of the Long Stratton Bypass, additional water bodies were created as part of the landscaping scheme between 2024 and 2025. SNDC therefore seeks confirmation from the applicant that these ponds will be included in the 2026 survey season. All ponds along the bypass have been afforded a 50m buffer.	The Applicant acknowledged this request and requested access to these ponds however, access was not provided. Further HSI assessments of these ponds can be undertaken, and if found to optimal habitat, using a precautionary approach, GCN could be assumed to be present. However, it should be noted that if these ponds were created as flood elevation basins/SUDS features, then GCN presence is considered to be highly unlikely due to the lack of aquatic opportunities for breeding purposes. The Applicant will continue to engage with SNC on Long Stratton Bypass additional water bodies and provide an update at Deadline 3. At Deadline 1 the Applicant is submitting an updated Appendix 8.3 – Great Crested Newt Survey Report [APP-161]. The ponds have been visited, and are accounted for within the associated updated report.	Under discussion
SNDC EB - 30	Adequacy of Surveys	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy (OSPMS) [APP-161] ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161]	The impact assessment for GCN used some eDNA desk-study survey data from 2019, 2020, 2023 and 2024 (where access could not be agreed upon to update surveys). However, SNDC considers that survey data received from 2019 and 2020 is now too old to be relied on for determination purposes, and the data from 2023 is of borderline age. In line with industry best practice (CIEEM Advice Note on the Lifespan of Ecological Reports and Surveys, (April 2019) (https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf) ecological survey data over three years old is unlikely to be valid in most cases and most, if not all of the surveys are likely to need to be updated. GCN survey data from 2021, 2020 would not be acceptable for determination of a Town and County Planning Act Application. Where GCN survey date is out of date the ponds should be treated as if GCN surveys have not been undertaken and a 50m buffer applied as set out in Design Principles, Parameters and Commitments [EN011014/APP/7.18]. Please see comments above regarding the PSMS.	Whilst relatively recent, the Applicant acknowledges that 2019 and 2020 data relied on in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] could be considered historic, whilst acknowledging that access has not been formerly provided to these ponds, and therefore this desk study data is the most reliable data presently available. The Applicant is of the view that 2019 and 2020 results should be considered reliable, as these represents credible survey results, albeit, received from a small number of years ago. It should be noted that information regarding GCN presence in the landscape has been augmented by detailed surveys commissioned by the Applicant and which are presented in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-161]. The Applicant is also satisfied that the inclusion of embedded mitigation to include a 50m buffer from ponds known to support GCN, and a 30m buffer where GCN presence has not been confirmed, will benefit this species regardless of the age of historic	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			Following a meeting on 21 & 22 September 2026 SNDC understand that additional surveys have been undertaken in 2026. This data will be released at some point.	data. These embedded measures set out in Appendix 7.18 Design principles, Parameters and Commitments [APP-213] are also reinforced by appropriate safeguards included in the Outline CEMP [APP-196], Outline LEMP [APP-197] and Outline DEMP [APP-198] such that impacts to GCN will be avoided. The Applicant notes further comments, and the matter will remain under discussion and be updated at Deadline 3.	
SNDC EB - 31	Adequacy of Surveys		Cable Route Corridor 7 passes through Fritton Grange Meadows County Wildlife Site (CWS) which contains lowland fen habitat. The crossing is proposed to be undertaken using HDD (minimum 5m below the riverbed) below existing peat deposits. A 30m buffer to the CWS and Hempnall Beck is proposed to avoid impacts during construction and operation. However, the thermo-resistivity assessment should be used to inform and substantiate the conclusion that heat generated by the cables will not adversely impact this irreplaceable habitat. Accordingly, it is requested that Chapter 9- Water Environment [APP-045] specifically considers impacts on lowland fen as an irreplaceable habitat and Fritton Grange Meadows CWS. E.A have requested further information. SNDC will defer to them on this matter.	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 in accordance with the process described in the Informative to EA30 provided by the EA. In relation to the Informative, during the meeting with the EA on 19/08/26 the EA clarified that where the Informative states “in the first instance, the developer should ensure that where practicable the proposed cabling... ‘does not cause pollution of surface water and groundwater’ should be read as ... ‘where practicable the proposed cabling... does not cause pollution of surface water and groundwater (other than heat)’. The Applicant notes that thermal effects are only 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 Outline OEMP. Where relevant, the Outline CEMP will also be updated to reflect any	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				design or construction requirements arising from the assessment process.	
SNDC EB - 32	Overall Assessment	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy (OSPMS) [APP-161]	Following mitigation secured through DCO requirements, impacts on ecological receptors are predicted to be negligible or minor adverse. While these effects may influence individual receptors, SNDC consider that they are not expected to compromise overall ecological integrity or conservation status. Construction and Operation and SNDC broadly agrees with the impact assessment for construction and operation (see LIR). Additional information is being submitted by the applicant with regards to potential thermal impacts on the lowland fen habitats. SNDC defer to EA regarding freshwater fish, and Natural England regarding White Clawed Crayfish. Where SNDC disagree with the assessment these have been raised within the SoCC Assessment of Effects on Species During Decommissioning SNDC disagrees with the ES with regards to the significance of effects post decommissioning on species, whose populations would be expected to increase as a result of habitat enhancements and creation. In line with EclA guidelines a worst-case scenario should be adopted which would comprise the removal of all created habitats following decommission – this would have a moderate adverse- significant effect on species such as skylarks, great crested newts, reptiles, bats (foraging and commuting) and badgers. SNDC have requested that a commitment is made to retaining certain habitats post decommissioning to reduce what will potentially be a significant loss of habitat and corresponding crash is biodiversity.	The Applicant agrees that following the mitigation measures secured through DCO requirements (and provided in outline form within the DCO submission) there will be no expected compromise in overall ecological integrity or conservation status. The Applicant will respond to the impact assessment in the LIR.	Under discussion
SNDC EB- 33	Fencing	APP-199 7.4 Outline Landscape and Ecology Management Plan Design Principles, Parameters and Commitments [APP-213] Commitments Register [APP-221].	EN-3 advises that buffer strips between perimeter fencing and hedges may be proposed and the design of any fencing should account for enabling mammal, reptile and other fauna, access into the site if required to do so in the ecology report. The proposed perimeter fencing is shown on the Indicative Masterplan near existing hedges and trees. Please can the applicant confirm the width of the buffer strip between the proposed fencing and existing and proposed habitats to ensure there is sufficient space for management. This should be reflected in the Design Principles, Parameters and Commitments [APP-213] and Commitments Register [APP-221].	The Applicant notes these comments and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			SNDC request that the fencing is also shown on the GI Strategy. Can existing hedging/woodland be used to avoid the need to security fencing?		
SNDC EB-34	General Comments on oLEMP	APP-199 7.4 Outline Landscape and Ecology Management Plan	SNDC note Table 2.1 of the oLEMP states that ghost ponds in Site3, 5b, 7d, 7f and 8a will be restored – for transparency please can the location of these ghost ponds be provided. Please can details be provided as to which ponds will be enhanced as details are not provided in the oLEMP, and where the 14 hibernacula will be located, and the number of bird boxes (including barn owl) and bat boxes to be provided per Site. Table 2.1 of the OLEMP advises that broadleaf woodland and linear tree belts are proposed around the BESS site. Please can the applicant confirm what buffer will be applied to ensure there is a sufficient fire break between the BESS and the planting scheme (see NPPF – Policy CC3 Adaption to climate change Para 2.3.4 notes the potential for use of green hay/locally sourced seed- can the applicant provided greater certainty around where green hay will be used – e.g. re-instatement of roadside verges following removal of access (reflecting RNRs in the area). Para 3.1.2 Please can the applicant confirm that any veteran tree management plans would be detailed within the LEMPs, Para 3.5.5 notes a 'shade cut' will be undertaken if the grass becomes too long – given the panels will have a maximum height of 4.5 m it is not clear why this is included. Similarly, given the panels are 'tracker panels' perhaps the proposals for providing 'modified grassland' beneath the panels can be re-visited and something more diverse and of greater value to biodiversity provided – perhaps hedgerow (shade) tolerant seed mix and perhaps some additional scrub. Greater use of pollinator seed mix is also requested over 'neutral grassland'. Para 3.2.3. should also include the offset for ancient woodland and veteran trees. To ensure that trees are not felled unnecessarily, it is requested that Requirement 40 is amended to include submission of Arboricultural Method Statements to the LPA as part of the LEMP. Section 3.6, (new) Broadleaf Woodland and 3.7 (new) Linear Tree Belts – In line with EN-3 it is requested that the understory of the woodland is seeded using a woodland seed mix to maximise	The Applicant notes these comments and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			biodiversity. Consideration should be given to locally relevant species (Norfolk Wildlife Trust can advise). Woodland species mixes included within the LEMP must be relevant to the local area and not indicative (or generic). They could be informed by the CWS citations and the extended habitat survey results [AS-017] e.g. include field maple, pedunculate oak, horse chestnut, holly (understory). Section 3.8 (new) Scrub- species mixes should be relevant to the local area i.e. they could be informed by the CWS citations and the extended habitat survey results [AS-017] e.g. include field maple, pedunculate oak, horse chestnut, holly (understory), bramble, blackthorn, elder and hawthorn. Section 3.9 (new) Native Hedges- In line with EN-3 it is requested that the base of new hedges are also seeded with a hedgerow mix to maximise biodiversity. Consideration should be given to locally relevant species (Norfolk Wildlife Trust can advise). New woodlands should be fenced off from browsing animals. Species should include hornbeam, hawthorn, blackthorn elm, occasional dog rose and field maple, hazel, oak, dogwood and informed by the extended habitat survey results [AS-017]. Section 3.10 (new) Native Hedgerow with Trees, 3.12 (new) Flower Rich Pollinator, 3.13 (new) Tussocky Grassland, 3.14 (new) Neutral Grassland– as above – should reflect local flora. 3.16.18 – has consideration been given to the creation of beetle banks? 3.16.22 creation of the otter holt needs to be considered as part of the BNG metric, and INNS. 3.16.17 and 3.16.19 – the LEMP identifies potential monitoring of hedgehogs and inverts if required, and a suggestion the new otter holt will be monitored (3.16.27). Please can the applicant confirm if monitoring will be undertaken as the LEMP should set out what will be done, not what could be done. BATS MONITORING 3.18.9 notes margins of the restored ghost ponds are to be planted – please can details be provided within the oLEMP.		

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			The LEMP should cover the entirety of the lifetime of the scheme (60 years) and include monitoring (see Section 4.3) against the BNG condition assessment for the 30 year period. It is requested that a commitment is made to retaining all newly planted broadleaf woodland, linear tree belts, trees planted adjacent to existing hedgerows, new /reinforced & native hedges/with/without trees, reinstated ghost ponds post decommissioning – reflected on an appropriate plan. Appendix A. The Key does not explain what the blue hashed box is (labelled e.g. CRC 10A & also CRC 9b (which is the Spong and Veteran Hedge 52)) Please can the applicant quantify the length of hedge required for removal (by CRC) and for visibility splays. Appendix B - Please can the applicant provide details of what these relate to in the oLEMP as we are unable to find them.		
SNDC EB-35	Lighting	Environmental Statement Volume 3: Appendix 7.11 - Lighting Strategy [APP-151]	The NPPF was updated in August 2026, with Policy P3 (e) stating that development proposals should ‘limit any adverse impact from artificial light ...on intrinsically dark landscapes and nature’ a) The impacts of lighting on ecology are broadly considered as part of Chapter 8, and in Table 3.1 of Lighting Strategy [APP-151]. The Lighting Strategy needs amending to recognise the presence of two County Wildlife Sites within the Order Limits (not one). b) SNDC disagrees with the Environmental Lighting Zone assessment as E2 – Rural, noting that much of the site comprises relatively uninhabited rural areas (E1) and grouping the entirety of the site under one zone is not appropriate. c) The Lighting Strategy provides limited information about how lighting will comply with ILP guidance 08 e.g. 0 % Upward Light Output Ratios, use of 2700 k or lower (not 3000k where practicable), avoiding peak wavelengths >550nm, identification of dark corridors and acceptable lux limits, details of luminaire specifications, and there is no provision within the Requirements to require submission and approval of details by the LPA (e.g. for the National Grid Substation, or project substations), and many of the	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			principles in Table 4.1 are 'were practicable'. It also notes lighting will be directed away from woodland/hedgerow but this will not prevent it being placed directly adjacent to them, which will be detrimental to bats and other nocturnal wildlife. Consideration should also be given within the landscaping scheme to screening impacts from lights. d) SNDC requests the DCO is amended to require submission of details and approval by the LPA for any lighting associated within each part of the authorised development where lighting is needed.		
SNDC EB-36	Updated protected species surveys to inform decommissioning	Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]	The ES advises that an updated PSMS will be used to inform decommissioning. It is noted that Requirement 9 of the DCO requires submission of a Protected Species Mitigation Strategy prior to commencement of each 'part' of the authorised development. The OPSMS specifically refers to construction phase of the scheme so SNDC request that the DCO is amended to reflect the need to undertake updated protected species surveys to inform decommissioning and that this information will be submitted to and approved by the LPA in consultation with Natural England.	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion
SNDC EB-37		Commitments Register [APP-221] Design Principles, Parameters and Commitments [APP-221]	The Commitments Register sets out the environmental mitigation measures to be adopted during the construction, operation and maintenance, and decommissioning phases to enable commitments to be tracked. It is not secured as part of the DCO. The Planning Inspectorate recently updated guidance for the submission of a Commitments Register (https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register). As submitted the Ecology and Biodiversity section of the Commitment Register is vague, and measures cannot be easily tracked. a) In line with this it is requested that the Commitments Register AS-038 details the following information: - Commitment – a description of the commitment itself, as quoted in the DCO and/ or relevant supporting document including the relevant chapter in the Environmental Statement i.e. CEC1 references paragraph 8.8.1 and 8.8.3 of ES Chapter 8 – Ecology and Biodiversity. Each commitment is specific (the term 'for example' is used frequently), with 1 commitment per row.	The Applicant notes these comments, and the matter will remain under discussion and be updated at Deadline 3.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			- Monitoring – whether monitoring is proposed and if so, a description of the monitoring measures as quoted in the DCO and/ or relevant supporting document e.g. how will we know a minimum 10% BNG will be achieved - Details what is in place to avoid and compensate impacts (not just mitigate them), as well as enhancement measures. - Project Phase – identification of the project phase to which the commitment relates. It is recommended that commitments related to each project phase are grouped together in the commitments register to allow for ease of interpretation - Delivery – identification of the stage at which the commitment should be delivered, as well as where National Grid will be responsible as the operator. b) It is also requested that the buffers are included within the Commitments Register.		

3.7 Noise and Vibration

Table 3.6: Noise and Vibration

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC NV – 1	Assessment Methodology - Operational Noise	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	The outdoor amenity space of the Noise Sensitive Receptors (NSRs) should be assessed as part of the noise and vibration assessment for the Scheme. 07/09/2026 The report ES Volume 1, Chapter 12 - Noise and Vibration [APP-048], does not state whether the noise level was monitored at the facial of the residential building or at the curtilage of the property. When assessing the impact on outdoor amenity the noise should be modelled at the curtilage of the property as it must be assumed that the resident would make full use of the curtilage as a worst-case scenario.	An assessment of sound levels at ground floor level has been provided in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048], in a location representative of the outdoor amenity spaces during daytime hours. The environmental sound survey was measured over a typical weekday and weekend period, the results of the survey form part of the assessment and have therefore been considered. 02/10/2026 To respond to SNC's concern regarding external amenity areas, the supplementary evening assessment considers a conservative scenario in which an amenity area is located 5 m from the worst-case façade, without screening from garden fences. This results in an approximate +1 dB adjustment relative to the façade-incident level due to facade reflections. Receptors at which this adjustment could result in the rating level exceeding the representative evening background sound level have been considered individually. In practice, where an amenity area is not located on the worst-case façade, or is screened by the dwelling or other structures, the sound level within that amenity area would be expected to be lower. The supplementary assessment concludes that the resulting effects remain not significant and do not alter the overall conclusions of ES Volume 1, Chapter 12 Noise and Vibration [APP-048].	Agreed
SNDC NV – 2	Construction Noise	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	SNDC consider that percussive piling is not considered to be appropriate due to the levels of noise and vibration they produce, and other types of piling [e.g. Screw piles] should be considered as this will remove the percussive noise impact. 07/09/2026 While it is accepted that only one property is predicted to exceed SOAEL. There are 38 properties which are between LOAEL and SOAEL. It is considered that the use of percussive piling in this instance does not represent Best Practical Means	To consider the worst-case, an assessment of percussive piling has been included in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] within the construction assessment. The results indicate that the construction noise Significant Observed Adverse Effect Level (SOAEL) could be exceeded at one receptor (NSR29, which are commercial facilities), and that significant effects are not expected. At NSR29, vibration levels due to solar PV piling could be up to 1.0 mm/s, which is in-line with the SOAEL. At other receptors which are further from	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			(BPM). The report does not consider any other alternative to the use of percussive piling which would be expected in this situation.	works, the magnitude of impact is expected to be negligible to low, and the effects are not expected to be significant. 02/10/2026 The Outline CEMP [APP-196] states that Contractors will be required to ensure that works are carried out in accordance with BPM as stipulated in the Control of Pollution Act and as specified in BS 5228-1. Good practice measures include selecting less noisy equipment where practicable.	
SNDC NV – 3	Construction Noise – HDD Works	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	SNDC are concerned that the assessment of Horizontal Directional Drilling (HDD) noise during construction does not appear to take into consideration the very low background noise levels in the area. 07/09/2026 The tables in ES Volume 1: Chapter 12 – Noise and Vibration (Revision 1) [APP-048] and Environmental Statement Volume 3: Appendix 12.2 – Noise Modelling and Calculations so that is apparent which data source was used in the assessment. Additionally, several NSRs in the cabling route crossing - HDD are not noted as being NSRs prior to their inclusion in the corresponding tables. This needs to be revised.	The measured ambient sound levels have been used to derive the Lowest Observed Adverse Effect Level (LOAEL) and SOAEL assessment criteria for construction works. This is described in Table 12-7 of ES Volume 1: Chapter 12 – Noise and Vibration [APP-048] . 02/10/2026 The Applicant accepts that additional receptors are described in Table 2.11 of ES Volume 2, Appendix 12.2 - Noise Modelling and Calculations [APP-179] which are not presented in ES Volume 1: Chapter 12 – Noise and Vibration [APP-048] . The receptors will be identified on a separate plan, and the relevant measurement locations will be identified in an accompanying table. The additional information will be provided at Deadline 2.	Under discussion
SNDC NV - 4	Operational - Layout	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	The lack of definitive parameters creates uncertainty as to whether the proposed mitigation can be achieved or would be adequate. SNDC consider that this raises the potential for significant impacts on the amenity of nearby residents. 07/09/2026 While we understand that the specifications of the equipment are not known currently. We feel that some assurance that not only modelling of the final plant is undertaken, but physical monitoring of the equipment is undertaken so that evidence can be supplied verifying the acceptability of the equipment. This should be included in the DCO as a requirement.	The following commitments are included in the Outline OEMP [APP-197] : - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on Public Right of Ways (PRoWs) will not exceed 55 dBA. The attenuation which may be required to achieve these commitments include:	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				• Equipment location • Application of attenuators • Enclosures • Reducing fan speeds • Optimising equipment orientation • Procuring quieter equipment. Through combination of these mitigation measures it is expected that the level of mitigation sought is practicably achievable. 02/10/2026 The Outline OEMP [APP-197] states that staff will carry out regular monitoring and maintenance of equipment, including identifying any changes in sound pitches or volume. Where changes are identified or where complaints are received, noise emissions will be compared with those which are committed to. Where they are found to be above the level which is committed to, mitigation will be applied as required.	
SNDC NV - 5	Operational Noise	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	SNDC believe that the ES provides insufficient detail to assess potential noise and vibration impacts during both construction and operation. SNDC have raised a series of technical queries on June 10 2026 in their response to the ES via the Relevant Representation. SNDC are awaiting further information.	The Applicant is continuing to consider these technical queries (in discussions with SNDC) and will update this SoCG at Deadline 3 to record the outcome of that process.	Under discussion
SNDC NV - 6	Operational Noise - BESS	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	The BESS has not been modelled at the worst-case scenario for assessment and SNDC therefore consider that there is no certainty regarding the adequacy of the proposed mitigation. Daytime hours have been used to assess the low frequency noise from the Battery Energy Storage System (BESS) and substations. However, to assess a true worst-case scenario morning, daytime, evening and nighttime should all be assessed. SNDC acknowledge the discussion opposite. However, we still consider that evening noise should be assessed. The reason for this is the drop off in noise in rural areas. This can be demonstrated by the graph below, which has been taken from the councils' archives of noise data. The data was recorded over a	Paragraph 12.8.49 of ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] states that the assessment is based on a worst-case scenario in which all the BESS enclosures and BESS inverters are assessed as operating at the worst-case design duty, and that in reality this type of operation is unlikely to occur, since cooling fans associated with the systems will only operate on demand when cooling is required. During the night, when ambient sound temperatures are lower, it is likely that the cooling fans may operate at a lower duty than the levels outlined in the calculations or may not operate at all in the colder months. It is therefore likely that sound levels at receptors would be lower than indicated within the assessment.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			6-day period which has then been averaged to show the LA90 across a 24-hour period. The site was an area in rural South Norfolk but must remain anonymous as it formed part of a noise complaint. It can be clearly seen that the evening period is significantly quieter than the daytime period and even quieter than the morning period, presumably due to the lack of dawn chorus. As such SNDC reiterate our request for the worst-case scenario to be assessed in line with the above information.	The assessment of low frequency noise utilises daytime sound levels (i.e. when the highest levels are produced by the Scheme) to provide a worst-case assessment. The low frequency noise levels are assessed against the night-time criteria outlined within the relevant guidance. The assessment of noise during the evening period is now included within the Evening Noise Assessment provided during Deadline 1.	
SNDC NV - 7	Operational Noise – National Grid Substation	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	The ES does not include any details of the National Grid Substation or its associated equipment. This requires clarification as SNDC is concerned that the National Grid substation may not have been adequately modelled, including whether appropriate data has been used to assess its noise impact. SNDC acknowledge the commitment. However, the Council also requires the noise levels to be modelled and monitored once the site has been commissioned to provide evidence that the noise levels have been met. This should be placed as a requirement on the DCO.	The finalised selection of equipment for the National Grid Substation has not yet been made. As noted within the Outline OEMP [APP-197]: <i>“The National Grid Substation will be located, or where this not practicable, mitigated, to ensure that the predicted façade incident rating level of sound at the nearest residential receptors shall not exceed the background sound level.”</i> This commitment is secured by Requirement 14 of the Draft DCO [AS-032] which states that prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part (substantially in accordance with the Outline Operational Management Plan) must be submitted to and approved by the relevant planning authority. The Outline OEMP [APP-197] states that staff will carry out regular monitoring and maintenance of equipment, including identifying any changes in sound pitches or volume. Where changes are identified or where complaints are received, noise emissions will be compared with those which are committed to. Where they are found to be above the level, which is committed to, mitigation will be applied as required.	Under discussion
SNDC NV - 8	Operational Noise – Tracking Motors	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	SNDC is concerned that the Solar PV Tracking Motors have not been included in the noise assessment [Operational Phase Only]: Given the number of panels which will be operating at the same time. Even if this has been scoped out, it should be included in the overall noise assessment.	Solar PV tracking motor noise has been assessed within ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] levels at all receptors and does not influence the overall specific sound levels. The assessment indicates that at all receptors, the magnitude of impact would be negligible. Operational noise from tracking motors will likely cause long term,	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				negligible adverse effects, and are considered not significant.	
SNDC NV - 9	Operational Noise - Mitigation	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	SNDC are unclear what mitigation measures have been applied to achieve the change in noise levels for Table 12-26 [APP-048] for residual operational effects or what levels of attenuation have been assumed in the calculations. While the Council understand that the specifications of the equipment are not known currently, we feel that some assurance that not only modelling of the final plant is undertaken, but physical monitoring of the equipment is undertaken so that evidence can be supplied verifying the acceptability of the equipment. This should be included in the DCO as a requirement.	The following commitments are included in the Outline Operational Environmental Management Plan [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PRowS will not exceed 55 dBA. - Example mitigation solutions are provided in paragraph 12.9.3 of ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. These include producing low-noise inverter models, acoustic enclosures, relocation or reorientation of plant, or installation of noise barriers. 02/10/2026 The Outline OEMP [APP-197] states that staff will carry out regular monitoring and maintenance of equipment, including identifying any changes in sound pitches or volume. Where changes are identified or where complaints are received, noise emissions will be compared with those which are committed to. Where they are found to be above the level which is committed to, mitigation will be applied as required.	Under discussion
SNDC NV - 10	Operational Noise – Assessment Outcomes	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	Paragraph 12.8.44 of document reference APP-048 states that 14 residences would experience an early morning noise impact between 1 and 5dB above background. However, the report does not specify how many properties would be impacted by increases at the lower end (1dB) versus the upper end (5dB) SNDC consider this limits the ability to properly understand the distribution of impacts. The assessment of noise effects is informed by the concepts of the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL), as set out in the Noise Policy	The following commitments are included in the Outline Operational Environmental Management Plan [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			Statement for England and applied through the National Planning Policy Framework and Planning Practice Guidance. These policy documents do not prescribe fixed numerical thresholds and require such levels to be determined on a case-specific basis, having regard to local baseline conditions. SNDC are awaiting the updated background noise levels from the applicant, which will include evening noise levels. As such we will reserve comments on this section. One exception is the use of absolute noise levels, which are not considered to be acceptable. In our experience receptors which live in a low noise environment are more adversely impacted by the inclusion of a noise source than receptors who live in a higher noise environment. They also are more susceptible to increased noise levels due to their sensitivity to increases in noise above the normal background levels.	Specific sound levels on PRowWs will not exceed 55 dBA. SNDC's comment is relying on the assessment pre-mitigation. It is appropriate to consider residual effects post-application of mitigation as set out in this response. With inclusion of mitigation, Table 12-26 of the ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] outlines that one receptor would experience rating levels above the background sound level during the early morning period and at night. The affected receptor is NSR3B, where the calculated rating level is 33 dB $L_{Ar,Tr}$ during the early morning period, and the background sound level is 32 dB $L_{A90,15minutes}$. The calculated rating level is 33 dB $L_{Ar,Tr}$ during the night-time period, and the background sound level is 31 dB $L_{A90,15minutes}$. Paragraph 12.8.50 of the ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] notes that 'for a given difference between the rating level and the background sound level, the magnitude of the overall impact might be greater for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.' It also notes that 'where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night'. On this basis, noise impacts are expected to be lower than presented, due to the low background and rating levels. The assessment of noise during the evening period is now included within the Evening Noise Assessment provided during Deadline 1. The assessment sets out further justification of why low rating levels would affect the level of impact, which is supported by guidance provided within BS 4142:2014+A1:2019.	
SNDC NV - 11	Operational Noise – Cumulative Effects	ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]	Confirm if the commitment in the OEMP to reduce operational noise level to below existing background sound levels extends to a commitment to keeping the	It is noted that there is an error in Table 12-28 of ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] . It should state that specific sound levels from the Scheme are 33 dB $L_{Aeq,T}$ and that specific	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			cumulative noise level below the existing background sound level at NSR3A? The applicant has not actually answered the question, but they have stated that the noise levels at night and early morning may be exceeded. How much is the background exceeded during these time frames and does the noise rating level exceed the background for evening and how much by.	sound levels from the committed development (planning reference 2024/3817) are 29 dB LAeq,T. During the daytime, rating levels from the Scheme are 8 dB below the background sound levels at NSR3A. Cumulative sound levels during the daytime are therefore expected to remain below the background sound level. Cumulative sound levels during the night-time and early morning periods may exceed the background sound level. 02/10/2026 At NSR3A, the rating levels from the Scheme is: • 8 dB below the background sound level during the daytime, without additional mitigation. • 1 dB below the background sound level during the night-time, without additional mitigation. • 2 dB below the background sound level during the early morning, with additional mitigation. • In-line or below the background sound level during the evening, with additional mitigation. The rating level from the committed development is: • 11 dB below the background sound level during the daytime. • 2 dB below the background sound level during the night-time. • 3 dB below the background sound level during the early morning period. • 5 dB below the background sound level during the evening. When the specific sound level is combined from both developments, the results indicate that: • The specific sound level is 7 dB below the background sound level during the daytime. • The specific sound level is 2 dB above the background sound level during the night-time. • The specific sound level is 1 dB above the background sound level during the early morning. • The specific sound level is in-line with the background sound level during the evening.	

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				The noise impact assessment which supported the committed development is based on noise emissions being the same throughout the day and night, and highlights that inverters would not operate at night, and may operate at a lower duty during the early morning period. Based on this, it is unlikely that the background sound level would be exceeded by the cumulative specific sound level from both developments.	
SNDC NV - 12	Requirements	ES Volume 1, Chapter 12 Noise and Vibration [APP-048]	Confirm whether the commitment for noise levels to be below the background sound levels at residential receptors be secured with a DCO Requirement? The fact that there is commitment to matching the noise levels of ES does not mean the same as commitment to being below background. This is especially important given our response in SNC NV – 6 which indicates that additional assessment is required as the data that has been presented does not include an assessment of the impact in the evening.	The Applicant commits to achieving the levels presented within the ES, within the Outline OEMP [APP-197]. The measures in the OEMP [APP-197] are, in turn, secured by Requirement 14 of the Draft DCO [AS-032] which states that prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part (substantially in accordance with the Outline Operational Management Plan) must be submitted to and approved by the relevant planning authority. The assessment of noise during the evening period is now included within the Evening Noise Assessment provided during Deadline 1.	Under discussion

3.8 Air Quality

Table 3.7: Air Quality

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
SNDC AQ - 1	Legislation and Policy Methodology Baseline Assessment of Impacts Mitigation / Management Plans	ES Volume 1, Chapter 13 – Air Quality [APP-049]	SNDC has provided no comment on legislation and policy; Methodology; Baseline Assessment of Impacts; or Mitigation / Management Plans in ES Volume 1, Chapter 13 – Air Quality [APP- 049], therefore, there are no outstanding matters.	The Applicant considers that ES Volume 1, Chapter 13 – Air Quality [APP-049] appropriately considered all these matters.	Agreed

3.9 Socio-Economics

Table 3.8: Socio-Economics

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC SE - 1	Businesses and Tourism – cumulative effects	ES Volume 1, Chapter 14 – Socio Economics [APP-050]	SNDC has expressed concerns that the cumulative and in combination effects of these Projects, together with existing infrastructure, will result in potential negative impacts on local businesses and tourism	During the construction phases, it is considered that each of the cumulative schemes will incorporate embedded mitigation measures (for example, through the preparation and implementation of a Construction Environmental Management Plan (CEMP) similar to the Outline CEMP [APP-196] prepared for the Scheme) minimising the cumulative economic effects on tourism during the construction phase. Once the Scheme is complete and operational there is the potential for a cumulative adverse effect on tourism related to visual amenity. Such effects are considered in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. It is considered that visual effects would be greater closer to the Order Limits, diminishing with distance, and therefore only tourism related activities within immediate proximity to the Sites have the potential to be adversely impacted. As such, it is considered that any such effects will be Not Significant.	Under discussion

3.10 Ground Conditions

Table 3.9: Ground Conditions

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC GC - 1	Ground Investigation	ES Volume 3, Appendix 16.1- Phase 1 Ground Conditions Assessment [APP-184].	While it is accepted that the majority of the site may present a low risk due to its long-term use as agricultural farmland, other identified areas, e.g. former military establishments, have a clear potential for contamination. The types of contamination which could have significant implications for construction workers, existing residents, groundwater and the wider environment. The report does not explicitly state that site investigation will not be undertaken, but neither does it confirm that it will. The Council consider this lack of clarity to be unacceptable. While it is acknowledged that there is a commitment to undertake a ground investigation. The report should also clearly state this so that there is no ambiguity. The report should also state that the site investigation would be agreed with the LA before implementation.	The Commitments Register [APP-221] includes a commitment (secured by DCO Requirement 13 in the Draft DCO [AS-032]) to undertake ground investigation and states that "<i>The results of the ground investigation will be used to inform the detailed design of the Scheme</i>". The first item in the Recommendations section of the Phase 1 Ground Conditions Assessment states: "<i>7.5.1. Potentially unacceptable risks associated with possible contamination have been identified (even a very low risk may be unacceptable depending on the perception and risk adversity of the stakeholder) and a post-consent intrusive investigation is recommended to characterise the conditions within the Order Limits. The ground investigation should be designed to allow the further evaluation of the pollutant linkages identified and facilitate design requirements for risk reduction measures, if required.</i>" This is considered appropriately clear and unambiguous. Schedule 2, Requirement 13 (2) of the Draft DCO [AS-032] states that <i>No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority.</i> The Outline CEMP [APP-196] manages ground investigation activities, and as noted above, the Outline CEMP [APP-196] will be submitted to the relevant planning authority for approval.	Under discussion
SNDC GC - 2	Risks to human health associated with historical RAF airfields	ES Volume 3, Appendix 16.1- Phase 1 Ground Conditions Assessment [APP-184].	The Council agrees with the applicants' assessment regarding groundwater, surface water and ecology with respect to the former RAF bases but disagrees with the assessment of risk to human health. This is primarily due to the proposed excavation works required for the installation of cables and associated infrastructure, which create pathways for direct contact with, and inhalation of, potentially contaminated materials.	Ground investigation will be undertaken post-consent, as described in the Commitments Register [APP-221] . Where the investigations identify a potential hazard, this will be assessed and, where necessary, remediated or appropriate mitigation included by the Contractor as described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] and the Outline CEMP [APP-196] (secured by DCO Requirement 13 – Draft DCO [AS-032]). On this basis, were a credible potential hazard to construction workers	Under discussion.

			While it is acknowledged that there is a commitment to undertake a ground investigation. The report should also clearly state this so that there is no ambiguity. The report should also state that the site investigation, remediation/mitigation would be agreed with the LA before implementation. With verification of the remediation being subject to agreement with the LA upon receipt of a formal report.	associated with the former RAF airfields to be identified, it would be assessed and remediated / mitigated. The first item in the Recommendations section of the Phase 1 Ground Conditions Assessment states: <i>“7.5.1. Potentially unacceptable risks associated with possible contamination have been identified (even a very low risk may be unacceptable depending on the perception and risk adversity of the stakeholder) and a post-consent intrusive investigation is recommended to characterise the conditions within the Order Limits. The ground investigation should be designed to allow the further evaluation of the pollutant linkages identified and facilitate design requirements for risk reduction measures, if required.”</i> This is considered appropriately clear and unambiguous. Schedule 2, Requirement 13 (2) of the Draft DCO [AS-032] states that <i>No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority.</i> The Outline CEMP [APP-196] manages ground investigation activities, and as noted above, the Outline CEMP [APP-196] will be submitted to the relevant planning authority for approval. The first item in the Risk Reduction section of the Phase 1 Ground Conditions Assessment states: <i>“5.6.2. risk reduction can be achieved through implementation of remediation or mitigation measures or through further tiers of assessment following collection of site-specific data.”</i> Although it is not specifically stated in the Phase 1 report, the Local Authority is the relevant regulator for matters relating to contaminated land remediation and their agreement to the verification of remediation would be sought.	
SNDC GC - 3	Use of FIDO at historical airfields RAF Hardwick and RAF Seething	ES Volume 3, Appendix 16.1- Phase 1 Ground Conditions Assessment [APP-184]. [APP-184].	In earlier consultation, SNDC questioned the use of FIDO at historical airfields RAF Hardwick and RAF Seething.	As described in the ES Volume 3, Appendix 16.1- Phase 1 Ground Conditions Assessment [APP-184]., neither RAF Hardwick or RAF Seething are understood to have been fitted with a FIDO system.	Agree

3.11 Cultural Heritage

Table 3.10: Cultural Heritage

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC CH – 1	Legislation and Policy	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNDC agree on this matter but recommend that the assessment should be updated in line with the new NPPF.	The Applicant considers that the assessment provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is in line with appropriate legislation, policy and guidance.	Agreed
SNDC CH – 2	Methodology	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNDC raised in the Relevant Representation that Grade II listed buildings are not only of regional significance as depicted in Table 10-3 and these brackets should be removed.	The methodology adopted within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is in line with appropriate guidance and has been derived following consultation with relevant stakeholders (i.e. SNDC and Historic England). This methodology of ascribing 'Medium (regional)' significance has been used in similar solar scheme DCO application assessments, some examples being The Drovers, Kings Lynn; Lime Down, Wiltshire; Mallard Pass, Lincs; Meridian, Lincs; and Greenhill, Northants. The methodology utilised within both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] were discussed at the 11 November 2025 meeting with SNC.	Under discussion
SNDC CH – 3	Baseline	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNCD agree on this matter.	The baseline conditions which are detailed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] are representative of the baseline site conditions.	Agreed
SNDC CH - 4	Significance of Harm	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]	SNDC agrees that the proposed development would result in less than substantial harm to the significance of the heritage assets affected. However, while the harm identified is less than substantial, it nevertheless should carry great weight in the decision-making progress. EN1 also states 5.9.29 Sec of state should give considerable importance and weight to the desirability of preserving all heritage assets. NPPF references need updating EN-1 para 5.9.27 The Secretary of State should also consider the desirability of the new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example,	The Applicant agrees with SNDC that the Scheme would result in 'less than substantial harm' to heritage assets. Policy HE6 of the National Planning Policy Framework (NPPF) considers the impact of development proposals upon the significance of designated heritage assets. Paragraph 1 of Policy HE6 states that where a development is proposed that would affect the significance of a designated heritage asset, <i>"substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)"</i>. Paragraph 4 emphasises that <i>'where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.'</i> The Applicant has sought, during the design process, to avoid, reduce or mitigate impacts upon heritage assets and their setting, as detailed within both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and Planning Statement [APP-209].	Agreed

			screen planting). Please note the reference to height in relation to design of the solar panels between 3m or 4.5m.	As further set out in the Planning Statement [APP-209] , having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.	
SNDC CH - 5	Sensitivity Criteria of Grade II Designated Heritage Assets	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]	SNDC generally supports the approach to assessing of the impact of the proposals on affected heritage assets, as set out in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]. However, SNDC emphasises that Grade II listed heritage assets are designated for their national significance, and policy requires that “every effort should be made to preserve them”. Accordingly, SNDC’s position is that it is incorrect to describe such assets as being of only regional significance. We accept that for the purposes of an EIA assessment that sensitivity of grade II assets are often described as medium . However, the sensitivity criteria of an identified receptor in an EIA assessment should not be confused with the assessment of significance and how setting contributes to that significance which is a requirement of EN 1 and the NPPF. Medium sensitivity is not the same as medium significance. This could be made clearer in the supporting text. For that reason, we suggest that they grade II assets are not referred to as regional sensitivity when they are of national significance. There does not appear to be any reasoning for referring to them as regional and this is not the case in the heritage value/sensitivity tables for Botley West Solar Farm able 7.8 p56 of ch7 EIA), p7-8 Sunnica Energy Farm; Hill House in particular is a nationally significant and noteworthy building as an example of Poor Law workhouse plan designed by William Thorold,	The sensitivity criteria of heritage assets as laid out in Table 10-3 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] was agreed at PEIR stage and has remained unchanged. It is generally accepted that designated heritage assets of Grade II status are of regional significance, with higher levels of sensitivity assigned to Grade II*, Grade I, Scheduled Monuments and World Heritage Sites. This methodology of ascribing ‘Medium (regional)’ significance has been used in similar solar scheme DCO application assessments, some examples being The Drovers, Kings Lynn; Lime Down, Wiltshire; Mallard Pass, Lincs; Meridian, Lincs; and Greenhill, Northants. Having said this, professional judgement has been used to assess the sensitivity of each heritage asset on an individual basis, and regional variations and individual qualities have been taken into account, where applicable. No Grade II designated heritage assets have been identified as showing exceptional quality in fabric or associations so as to being of over define their significance higher than medium/regionally sensitivity. The Applicant maintains that the sensitivity criteria outline in Table 10-3 of the ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] are correct.	Under Discussion

			which has an unusual octagonal cross shaped plan that has been specifically mentioned in national publications such as in workhouses.org.uk by historian Peter Higginbotham which is frequently cited by researchers.		
SNDC CH - 6	Magnitude of Impact of Heritage Assets	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNDC notes that the impact on heritage assets has been described as low adverse harm, on the basis that only limited harm to the setting would occur, and that the asset can still be appreciated from other aspects of their setting without being affected. However, given the markedly different character of the proposals when compared with existing local character, it is considered that the overall scale of effect should be assessed as moderate rather than minor, as set out in Table 10-5 of APP-046. This constitutes a significant effect, as the setting would not be preserved. Can the applicant explain why the above is in contrast to less than substantial harm, although this needs to be updated in line with the new NPPF. Moderate harm is not substantial harm. However, less than substantial harm is still referred to in EN-1. In table 10-4 a high magnitude of impact with regard to the setting is substantial harm to a heritage setting, such that the significance of the asset would be totally lost or substantially reduced” Medium magnitude of impact refers to “considerable harm to a heritage assets setting, such that the assets significance would be materially affected/considerably devalued, but not totally or substantially lost.” I consider that the bar for medium magnitude of impact is too high and too similar to the high magnitude of impact. A medium magnitude of impact would be for example “changes to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is clearly harmed”. This is the definition of medium harm in the West Botley NSIP. It is also worth noting in the new NPPF HE5 that a substantial harm “would occur where the development proposal would seriously affect a key element of the asset’s significance.” It is agreed that this is a high bar with regard to setting, and	As noted in Table 10.4 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], a medium/moderate adverse impact to heritage assets includes ‘considerable harm to a heritage asset’s setting, such that the asset’s significance would be materially affected/considerably devalued, but not totally or substantially lost.’ The Applicant maintains that the impact criteria outlined in Table 10-4 of the ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] have been correctly utilised in the assessment of impact upon heritage assets, and that the conclusions reached in Table 10-5 of APP-046 are correct. The evolution of the design (ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]), as well as the embedded and proposed mitigation measures of the Scheme (Design Principles, Parameters and Commitments [APP-213]; Outline LEMP [APP-198]) have taken into account built-heritage assets, including potential impacts to their settings, and it is considered that there will be an <u>overall neutral effect</u> upon the majority of designated heritage assets, and a <u>minor adverse effect</u> upon the significance of one designated heritage assets, which is considered not significant in EIA terms.	Under Discussion

			therefore medium magnitude of impact would be changes to setting that would affect the setting to a degree that significance is affected, but not to a serious extent.” It is however significant and need to be in the planning balance and mitigated where possible with reduction in adverse impact as much as possible. A medium level of sensitivity given to a grade II heritage asset, and medium magnitude of impact, would then result in moderate effect. In table 7.10 assessment matrix of West Botley p58 medium sensitivity and medium magnitude of impact results in a moderate level of harm which is considered significant. It is also noted in para 10.5.19 “In some cases, the matrix allows a choice of significance of effect when a magnitude of impact and a value are combined. In these cases, the individual attributes of a specific asset, along with any relevant site-specific factors and consideration of other influencing elements, have been considered, based on which is the most appropriate significance of effect to apply. There may also be situations where the tabulated nature of the matrix presents a restriction on the assessment of the effect, for example where professional judgement suggests an impact falls between categories.”		
SNDC CH - 7	Direct Impacts to Designated Heritage Assets	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNDC agrees that no designated heritage assets will be directly affected.	The Applicant is in agreement with SNDC, and this has been stated in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] .	Agreed
SNDC CH - 8	Indirect Impacts to Designated Heritage Assets	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]	SNDC notes that the Scheme will affect the setting of various heritage assets and the way in which the setting contributes to appreciating and experiencing the significance of those assets. SNDC disagrees as to how much the proposals affect the setting of some heritage assets.	This is addressed on a site-by-site basis below within SNDC CH – 12, CH-14 to SNDC CH – 16	Under Discussion
SNDC CH - 9	Design Parameters (heights of panels in sensitive areas)	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046], ES Volume 3, Appendix 10.1 Heritage Statement [APP-165 - APP 168] ES Volume 1, Chapter 4 – The Scheme [APP-040]	Within areas close to designated heritage assets, a secured design parameter within the DCO should require the use of lower-height fixed panels at 3 m to minimise harm. The use of 4.5 m high panels should be restricted to locations where they would have the least impact, and where any screening through tree planting would not introduce additional	Mitigation measures regarding sensitive, designated heritage assets have followed an iterative considered process which began pre-design stage in order to provide extensive embedded mitigation. Such heritage assets were identified at an early stage and solar panels removed from within their setting where it was considered to contribute highly to their significance, therein providing a considered setback in the	Under Discussion

		Design Principles, Parameters and Commitments [APP-213]	adverse effects on the setting of heritage assets. In sensitive locations, including the setting of heritage assets and where views to and from an asset may be materially affected, the design parameters should require lower-height panels supported by hedgerow screening and intermittent hedgerow trees.	design. Where it has also been possible to provide screening to further reduce visibility in relatively close proximity or in long views has also been included. Therein, detailed assessment has been provided in ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] based on the assumption of all solar infrastructure at the maximum possible heights, as set out in ES Volume 1, Chapter 4 – The Scheme [APP-040] and Design Principles, Parameters and Commitments [APP-213] , with the Solar PV Panels assessed at 4.5m height so that the worst-case scenario is assessed. Section 4.3 of [APP-040] notes that should Single-Axis Tracker Panels been utilised within the Scheme, the modules would track from east to west throughout the day, and it is acknowledged that this maximum height will only be experienced at set intervals during the day. At night, the panels would return to their resting position at 60 degrees, though the height of the Solar PV Panels during nighttime hours is not considered to result in any potential impacts to built-heritage assets as a result of the embedded mitigation measures. Comments regarding Solar PV Panel heights in relation to specific heritage assets have been further addressed within SN CH – 12 – SN CH - 18.	
SNDC CH - 10	Impacts on heritage assets within the vicinity of Sub-Site 1B Grade II Listed Moulton Farmhouse (NHLE 1373270)	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] ES Volume 3. Appendix 10.1 – Heritage Assessment [APP-165 - APP 168] Outline LEMP [APP-199] ES Volume 3 Appendix 7.5 Photosheets - Site 1 [APP-125]	Site 1B and BESS, - SNDC consider that the current proposals would cause less than substantial harm at the low to medium end of the scale (and in the comment conclusions, moderate level of harm) to Moulton Farmhouse unless the following mitigation measures are taken: Removal of the field west of Moulton Farmhouse from the built parameters of the Scheme. We agree that there is no substantial harm. Can the applicant explain what has been contradicted? In terms of setting, the view to and from the front and principal elevation is of most significance with regard to the setting within the landscape. rural isolated setting as a farmhouse. Because this is the most important element of the setting that contributes to the buildings significance, it is considered to result in a moderate degree of harm.	The moderate, and therefore significant, level of harm to Moulton Farmhouse stated in the comment conclusions has been contradicted by SNDC, as they state here, and in SNDC CH-4, that the Scheme would result in a low to medium level of less than substantial harm. The applicant refers back to the ascribed moderate outcome from medium harm being: <i>Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. (Table 10.4 ES Volume 1, Chapter 10 – Cultural Heritage [APP-046])</i> It has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced (Bedford Borough Council v Secretary of State for Communities and Local Government and Nuon UK Limited [2013] EWHC 4344 (Admin)). It stands to reason, therefore, that less than substantial harm covers a very broad spectrum indeed. The harm ascribed by SNDC would, therefore, be towards the upper end of that spectrum and would require something approaching substantial harm and even to fall within the	Under Discussion

				middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Impacts on heritage assets within the vicinity of Site 1B were assessed within ES Volume 3, Appendix 10.1 – Heritage Assessment [APP165 to APP168] and were summarised within ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]. The historically associated setting, i.e. that portion of the setting to which it was documented to be physically and intrinsically linked due to it having been part of its working landscape, was to the east of Moulton Farmhouse and not the west wherein the Scheme is located. To this end, the assessment concluded this was the most important element of the setting and so the Applicant disagrees with SNDC on this aspect. Consequently, it was concluded that the proposals would result in less than substantial harm to Moulton Farmhouse. Views of the Grade II listed building from the footpath within Sub-Site 1B are of interest and illustrate the heritage asset's significance. These will be obscured by the Project Substation as part of the Scheme. In terms of the scales of impact as defined in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046], in order to be a moderate impact, there would need to be considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This is a relatively high level of impact which is not reflected by the proposals which would retain the vast majority of the surrounding landscape visible from the heritage asset. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining and the loss of a single view of Moulton Farmhouse from a nearby footpath, albeit one that is considered to contribute to an understanding of the listed building's significance. The Applicant has sought, during the design process, to avoid, reduce or mitigate impacts upon heritage assets and their setting, as detailed within both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and Planning Statement [APP-209]. This includes visual screening in the form of linear native tree belts, enhanced hedgerows and infilling of gaps in existing hedgerows, as detailed within the Green Infrastructure Strategy [AS-005], in addition to the siting of larger elements	
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				of the Scheme, including the BESS and Sub-Station, as detailed in Design Approach Document [APP-212]. It is not considered that the small visible areas of the Solar PV Panels to the west of Moulton Farmhouse would dominate or intrude the setting of the listed building. Whilst the visibility of Solar PV Arrays would represent a change in the setting of Moulton Farmhouse, the vast majority of any vistas of and from the heritage asset would remain in agricultural use. It is not considered by the applicant that the removal of the field to the west of Moulton Farmhouse would change the level or magnitude of impact. Under the Scheme, the Solar PV Panels here may be partially visible from the listed building, but this visibility would not be at a detriment to the significance of the heritage asset as a whole. It is therefore not considered that the proposals have the potential to cause moderate harm. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.	
SNDC CH – 11	Impacts on heritage assets within the vicinity of Sub-Site 2A Grade II Listed Hill House (NHLE 1050216)	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 - Heritage Assessment [APP-165 - APP 168] Outline LEMP [APP-199] Green Infrastructure Strategy [AS-005] ES Volume 3, Appendix 7.5 - Photosheets - Site 2 [APP-126]	Site 2A – It is considered by SNDC that the current proposals would cause moderate and therefore significant harm to Hill House unless the following mitigation measures are added: • Removal of the field immediately west of Hill House from the built parameters; • Limiting height of Solar PV Panels to 3m; • Screening provided by hedgerows rather than extensive tree planting immediately west of Hill House.	Impacts on heritage assets within the vicinity of Site 2A were assessed within ES Volume 3 Appendix 10.1 – Heritage Assessment [APP165 to APP168] and were summarised within ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]. The setting of Hill House is largely defined by its prominent frontage onto the busy main route of Ipswich Road, which lies between the listed building and Sub-Site 2A. The south-eastern part of Sub-Site 2A already possesses a hedgerow of varying maturity, with the hedgerow west of Hill House fairly established, though it is acknowledged that there are gaps in this coverage which allows for intervisibility between Hill House and this field within Sub-Site 2A. The Applicant has sought, during the design process, to avoid, reduce or mitigate impacts upon heritage assets and their setting, as detailed within both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and Planning Statement [APP-209]. This includes visual screening in the form of linear native tree belts, enhanced hedgerows and infilling of gaps in existing hedgerows, as well as establishment of setbacks within certain areas of the Scheme. Within the field immediately opposite Hill	Under Discussion

				House, a 20m set back has been established along the entire Ipswich Road boundary, with a native broadleaf woodland proposed behind the existing hedgerow, as identified on the Green Infrastructure Strategy [AS-005]. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. Setbacks incorporated into the design of Scheme, combined with the proposed landscape mitigation, will ensure that the roadside prominence of the designated heritage asset is preserved and that the presence of Solar PV arrays will not distract from views, and therein appreciation, of the listed building from this main thoroughfare. The significance of Hill House is principally vested in its architectural and historic interests as an early 19th century workhouse and an interesting octagonal, cross-shaped planform designed by a local, and relatively prolific architect, William Thorold. The setting of institutional buildings such as Hill House were deliberately built away from settlements and as such, its isolated location contributes to an understanding of its original, historical positioning here. Views that allow for an appreciation of this significance are largely from the roadside looking eastwards and from the adjacent footpath looking southwards, which would be entirely unaltered by the Scheme. The Consultee has stated that there is a historic connection between the former workhouse and the surrounding fields. However, this historic setting has effectively been severed by the expansion of the former turnpike road, now Ipswich Road, and the large car parks to the west and south of the listed building serving the adjacent nursery. It is viewed by the Applicant that the key elements of the listed building's setting, specifically its roadside prominence and historic grounds, and its relationship with the village of Pulham Market to the south-east (one of the villages the workhouse served), will remain unaltered by the Scheme, which is not situated between either the listed building and the roadside nor the listed building and village. The presence of Ipswich Road, due to the volume of traffic and level of noise, negatively dominates the west side of the heritage asset and experience within this portion of the setting. As such, it is considered that the ability to understand its siting from within Site 2A here and the way in which this conveys its historic design will not be affected.	
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				Solar PV arrays within Site 2A would result in a change of use and would likely be at least partially visible from Hill House. However, visibility of elements of the Scheme does not automatically equate harm. It is not considered that the implementation of landscape mitigation within this area will result in the enclosure for views from the asset over agricultural land to the west. Hill House is set back c. 25m from Ipswich Road, and this set back will still preserve the sense of openness to the west. The Applicant notes that while Bridleway BR9 extends along the western boundary of Sub-Site 2A, c. 700m west of Hill House, FP8 is situated c. 1.3km south-east of Hill House and is not considered relevant to this assessment. The Applicant is assuming the Consultee means to reference either FP10, which branches off of BR9, west of Sub-Site 2A. ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139] shows the visualisations of the site from the north-western corner of the Hill House complex, as well as views towards Hill House from BR9. It is acknowledged that while the presence of Solar PV Panels within Sub-Site 2A will entirely impede any views of the western elevation of Hill House from BR9, these views already exist at quite a distance, and are partially screened by the vegetation west of Ipswich Road, as well as along the intervening fields. The Consultee has stated that the proposals will result in moderate (and therefore substantial) harm to Hill House. As stated above, it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. Partial visibility of Solar PV arrays in a small section portion of a listed building’s setting, at least partially screened by existing hedgerows and trees, and on the other side of the heavily used Ipswich Road, would not be such that the significance of Hill House would be vitiated, and it is for this reason that the Applicant disagrees with the Consultee’s ascription of harm. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.	
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SNDC CH – 12	Impacts on heritage assets within the vicinity of Site 4 Grade II Listed The Cedars (NHLE 1304177)	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 - Heritage Assessment [APP-165 - APP 168] Outline LEMP[APP-199] Green Infrastructure Strategy [AS-005] Green Infrastructure Strategy [AS-005] ES Volume 3, Appendix 7.5 =Photosheets - Site 4 [APP-128]	Site 4 – SNDC agrees that given the distances involved and the ability to appreciate the heritage asset from other aspects of their setting, the scale of effect will be relatively minor and at the lower end of less than substantial harm. However, to further reduce impact and harm, it is advised that, in the more sensitive area [around Cedar House], the following mitigation measures are added: Solar PV panels in sensitive areas closest to Cedar House should be reduced from 4.5m to no more than 3m in height.	Impacts on heritage assets within the vicinity of Site 4 were assessed within ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 to168] and were summarised within ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]. As illustrated in Green Infrastructure Strategy [AS-005], the parts of the Scheme closest to The Cedars are to the north-east and east, with these areas in Sub-Site having been removed from the built parameters. The Solar PV Panels are set back over 225m to the north-east and 285m to the east. Within this setback is extensive screening. To the north-west, a new linear native broadleaf woodland will be established, which will be a continuation of the established veteran trees already present to the north of The Cedars. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the Outline LEMP [APP-199] created prior to the implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 of the Draft DCO [AS-032]. To the north-west, views of the solar panels will be oblique and beyond a busy main road. They will also be set at a considerable distance (at a minimum of 170m) and will constitute a small part of wider vistas. The change in height from 3m to 4.5m would not have any substantial reduction in impact, which is already very minor and not harmful in any way to the significance of the heritage asset. Visibility of panels in the wider landscape of The Cedars will result in change, but it is considered by the Applicant that this change does not constitute harm.	Under Discussion
SNDC CH – 13	Impacts on heritage assets within the vicinity of Sub-Site 7C Grade II Listed Grove Farmhouse (NHLE 1050330) Grade II Listed Wood Farmhouse (NHLE 1373238)	ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] ES Volume 3, Appendix 10.1 - Heritage Assessment [APP-165 - APP 168] Outline LEMP [APP-199] Green Infrastructure Strategy [AS-005] ES Volume 3 Appendix 7.5 Photosheets - Site 7 [APP-131]	Site 7C – SNDC considers the proposed landscape mitigation within Sub-Site 7C would create a sense of enclosure to the north, contrasting with the current, relatively open, framed landscape character. They recommend the following revised mitigation measures: - Solar PV Panels should be reduced from 4.5m to 3m in height; - Hedgerow planting to provide screening of Solar PV Panels instead of proposed native linear tree belt, to preserve the openness and character of the agricultural setting, and to minimise harm to both designated heritage assets.	Impacts on heritage assets within the vicinity of Sub-Site 7C were assessed within ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 toAPP-168] and were summarised within ES Volume 1, Chapter 10 Cultural Heritage [APP-046]. The landscape surrounding Grove Farmhouse and Wood Farmhouse is not one particularly defined by its openness; rather it is bordered by ancient woodlands to the east and west and further enclosed by mature tall hedgerows and trees across the field boundaries of the surrounding areas. Longer range views are further hampered by the rising topography to the north and in fact, views of both listed buildings from within Sub-Site 7C show them to be nestled down in the landscape with predominantly only the rooflines visible. There is a better	Under Discussion

				sense of openness in views between the two listed buildings and to the south, which would not be affected by the Scheme. As part of the initial design process, a substantial setback was established within the Scheme's embedded mitigation to the north of the farmhouse, where Solar PV Panels were removed from those areas of Sub-Site 7C to the north of these heritage assets, with the land to the north of Wood Farmhouse to be retained as agricultural land and utilised for as skylark mitigation, whilst the land to the north and west of Grove Farmhouse to be retained as open agricultural land. These spaces will be bounded to the north by new native broadleaf woodland and linear tree belts, as illustrated on Green Infrastructure Strategy [AS-005]. As such, there will be a sufficient buffer of open land to preserve what limited, existing sense of openness can be experienced, with the proposed treeline situated at a distance that would not impose on or dominate this. The Applicant disagrees that a revised design scheme is required to minimise impacts to Wood Farmhouse and Grove Farmhouse. At present, it is considered that the established setbacks between both heritage assets and the developable area is considered sufficient to ensure that the Solar PV Panels will not be overly prominent within any views from or of either asset. The reduction of Solar PV Panel height to 3m, as well as an associated reduced screening height, would not have any meaningful effect on the sense of openness/enclosure of the surrounding landscape, nor would it allow for a greater ability to understand the setting of either Farmhouse. As further set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.	
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3.12 Waste

Table 3.11: Waste

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC W-1	Waste Management - Construction	Outline Soil Resource Management Plan [APP-204] Outline Cable Route Construction Statement [APP-216]	The Outline Cable Route Construction Statement [APP-216] states that spoil (topsoil and subsoil) will be stored temporarily within designated areas along the Cable Route Corridor (CRC) and within the temporary construction compounds. The spoil will be utilised to backfill the launch and reception pits, and to reinstate the temporary construction compounds and temporary access tracks. It further states that any contaminated spoil identified during construction would be transported off Site to a licenced waste facility for treatment. However, SNDC are concerned that this appears to conflict with the Soil Resource Management Plan [APP-204] which states that all subsoil displaced by the cable will be removed from site. Further clarification is therefore requested on this apparent inconsistency. SNDC understand that this is being reviewed by the Applicant to ensure the wording of the oSRMP is interpreted correctly.	The Outline SRMP [APP-204] does not specify the removal of subsoil. We will liaise with the consultee to seek to understand the concern and resolve any discrepancies.	Under Discussion
SNDC W-2	DCO Requirements: Requirement 20	Draft Development Consent Order [AS-032]	Requirement 20 – Site Waste Management SNDC considers that discharge of this Requirement should include “in consultation with” Norfolk County Council (in its capacity as Minerals and Waste Authority), and this should be clearly reflected in the wording.	The Applicant will consider any request from Norfolk County Council to be included as a consultee.	Under Discussion

3.13 Electromagnetic Fields

Table 3.12: Electromagnetic Fields

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EMF 1	Adequacy of the assessment. Paragraph 7.21 and 7.21.1	ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]	SNDC has concerns regarding the adequacy of the assessment of Electromagnetic Fields and sets out below its requests for additional information/clarification from the applicant. Please provide evidence, including calculations, demonstrating that electromagnetic field (EMF) levels will be reduced below 4kV m⁻¹. Additionally, please specify the predicted EMF levels that will be experienced at the relevant receptor locations. SNDC acknowledge the diagrams but request the actual calculations which can be easily produced and the levels to which the closest resident would be subjected.	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment presented in ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions. ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] states (section 4.2.3) that there are no external electric fields associated with underground cables (of any voltage capacity) and therefore the electric field strength will be below 4 KV m⁻¹. Figure 17.4 of the technical assessment presents that the electric field strength for 400kV overhead cables will be less than 4kV m⁻¹ within 20m from the centreline. The closest dwellings to the existing overhead cable network are located at Gore Lane, measuring a lateral distance of approximately 90m. At this distance, the electric field strength will be 0 kV m⁻¹. Further to this, the predicted EMF levels at the relevant receptor locations will therefore be below the threshold level of 5kV m⁻¹.	Under Discussion
SNDC EMF 2	Adequacy of the assessment - 7.21.2	ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]	Please provide evidence demonstrating that the EMF will effectively be contained within the underground cable's insulation and sheath. Please provide copies of the National Grid documents as stated.	ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] draws this conclusion from published information managed by National Grid (source: https://www.emfs.info/electricity-system-and-sources/cables) and therefore considers this conclusion robust and reliable. It should be noted that the statement refers to electric fields associated with underground cables specifically, where underground cables are constructed with an insulating layer or sheath, where this insulating layer/sheath acts as an electrostatic shield.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EMF 3	Human Health - 7.21.3	ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053], ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]	Please justify why human health is only classified as being of only Medium Sensitivity. While humans may be regularly be exposed to EMF, this but does not necessarily mean that they are not sensitive to them, nor that even a slight increase in EMF would not have an adverse effect. SNDC further requested to provide documentation/guidance which justifies the position that the impact on human health is classed as Medium.	Human health is classified as being of Medium sensitivity due to routinely experiencing varying EMFs within a regulated range. The sensitivity is in line with the World Health Organization (WHO) which recognises that exposure to EMF is an environmental health consideration and is consistent with the Institute of Environmental Management and Assessment (IEMA) Guide to 'Determining Significance for Human Health', which identifies medium sensitivity is applicable for people 'with poor health status; and/or people with a limited capacity to adapt.' Table 1 of ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] outlines the sources and field strengths of EMF experienced by humans. Therefore, as outlined in Table 17.4 ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053] , an alternate sensitivity classification (i.e. High) is not considered appropriate for human health.	Under Discussion
SNDC EMF 4	Adequacy of the assessment - 7.21.4		Please provide calculations to support the statement that the magnitude of impact is Low, and the resulting impact significance is Minor and Not Significant with regard to overhead cables. SNDC can understand the logic of the statement, SNDC are asking for the calculations which should be easily supplied.	The maximum magnetic field strength for the maximum voltage overhead cable (400kV) is below the threshold value of 100µT. Therefore, the magnitude of any impact experienced will be Low. A Low impact for a receptor of Medium Sensitivity (human health) results in a Minor and Not Significant effect. The maximum electric field strength for the maximum voltage overhead cable measures 10.6 kV m ⁻¹ . The field strength measures below the threshold value of 5 kV m ⁻¹ within 15m from the centreline. Given that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022), and the distances between the relevant receptors, the field strength of any electric field will be below the threshold value of 5 kV m ⁻¹ . The closest dwellings to the existing overhead cable network are located at Gore Lane, measuring a lateral distance of approximately 90m. At this distance, the electric field strength will be 0 kV m ⁻¹ . Therefore, the magnitude of any impact experienced will be Low. A Low impact for a receptor of Medium Sensitivity (human health) results in a Minor and Not Significant effect.	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
SNDC EMF 5	Adequacy of the assessment - 7.21.5	ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]	SNDC requests to provide evidence to support the 10 kV m⁻¹ statement along with calculations demonstrating the <5 kV m⁻¹ level, including the actual predicated value. Please provide the source of this statement.	Figure 17.4 ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] shows that the maximum electric field measures 10.6 kV m⁻¹ (source: https://www.emfs.info/electricity-system-and-sources/overhead-line/transmission#230548828-1404273005). Note that the source has since been updated and presents a lower maximum electric field strength of 4.5kV m⁻¹. The Applicant has used the higher and more conservative value of 10.6 kV m⁻¹ as presented in Figure 17.4.) The same figure shows that the electric field strength will be less than 5kV m⁻¹ within 15m from the centreline, and therefore within the range of 45-50m. The closest dwellings to the existing overhead cable network are located at Gore Lane, measuring a lateral distance of approximately 90m. At this distance, the electric field strength will be 0 kV m⁻¹. Given that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022, https://www.earlstonham.org.uk/assets/Uploads/East-Anglia-GREEN-Project-background-document.pdf), and the distances between the relevant receptors, the field strength of any electric field will be below the threshold value of 5 kV m⁻¹.	Under Discussion

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited [the Applicant] and South Norfolk 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 South Norfolk Council.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

- 4.1.4 The parties have engaged throughout the pre-application stage, which comprised technical meetings and regular planning meetings. In addition, the following stages of consultation have 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.
- 4.1.5 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	• Project progress update
27 November 2024	Virtual Meeting	• Landscape and Visual Methodology including view locations. • Hedgerow enhancement including measures such as hedge laying to restore degraded features. • Upfront arboriculture surveys to ensure baseline understood and informing design development. • Land Contamination • Air Quality • Ecology Surveys • Heritage Assessment
04 December 2024	Virtual Meeting	• Project progress update
05 March 2025	Virtual Meeting	• Project progress update • Scoping update

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		- Statement of Community Consultation - Cumulative Development
08 April 2025	Virtual Meeting	- Project progress update - PEIR update - Statement of Community Consultation - Compensation
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
03 October 2025	Virtual Meeting	Project planning update
06 November 2025	Virtual Meeting	Project progress update
11 November 2025	Virtual Meeting	- Site layout and noise mitigation - Air Quality Monitoring - Water Supplies
04 December 2025	Virtual Meeting	Project progress update
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

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		spaces, permitted paths, ghost pond restoration, and skylark mitigation • 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 • Stakeholder Engagement
15 April 2026	Virtual Meeting	• Project progress update • DCO Requirements
20 May 2026	Virtual Meeting	• Project progress update • Technical engagement • SoCG

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
24 July 2026	Virtual Meeting	- Project progress update - Noise
19 August 2026	Virtual Meeting	- Project progress update - SoCG meetings discussion
26 August 2026	Email	Applicant shared first draft of SoCG with consultee
09 September	Meeting	SoCG meeting on Planning, EiA, Socioeconomics and Waste.
02 October 2026	Email	The Applicant received detailed comments from SNDC on all matters in the SoCG.
Landscape and Visual		
20 September 2024	Email Correspondence	Consultation on proposed view locations as part of the LVIA.
27 November 2024	Email Correspondence	Consultation on proposed view locations as part of the LVIA.
18 December 2024	Email Correspondence	Consultation on proposed view locations as part of the LVIA.
6 & 7 January 205	Email Correspondence	Consultation on proposed view locations as part of the LVIA.
7 February 2025	Email Correspondence	Consultation on proposed view locations as part of the LVIA.
7 March 2025	Email Correspondence	Consultation on Visualisations to Support Statutory Consultation
2 April 2025 8 April 2025 9 April 2025	Email Correspondence	Consultation on Visualisations to Support Statutory Consultation
9 April 2025	Phone Call and Email Correspond	Consultation on Visualisations to Support Statutory Consultation / View Locations at Site 8

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
5 September 2025 8 September 2025	Email Correspondence	Consultation on Visualisations for Landscape and Visual Impact Assessment
23 September 2025	Email Correspondence	Consultation on Visualisations for Landscape and Visual Impact Assessment
22 October 2025	Email Correspondence	Consultation on Environmental / Landscape Strategy
30 October 2025	Email Correspondence	Consultation on Visualisations for Landscape and Visual Impact Assessment
15 December 2025	Email Correspondence	Consultation on Environmental / Landscape Strategy
21 September 2026	Meeting	SoCG Meeting - Ecology, Landscape and Heritage
Ecology and Biodiversity		
25 February 2025	Scoping Opinion	- Protected species surveys completed (GCN, badger and bats). - Habitat, woodland and bat impact assessments undertaken. - Mitigation measures proposed, including buffers to ancient woodland.
6 August 2025	PEIR Response	- Mitigation measures - Assessment and surveys
21 September 2026	Meeting	SoCG Meeting - Ecology, Landscape and Heritage
22 September 2026	Meeting	Follow up ecology meeting on SoCG
Noise and Vibration		
6 August 2025	Relevant Representation	Assessment of Solar PV tracking motors – an assessment was

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		provided within the ES as requested by SNDC. Nurseries to have a high sensitivity – this was adopted within the ES as requested within the ES. Operational noise levels – the assessment targets achieving 0 dB above background sound level wherever practicable. The council's working hours were noted. SNDC advised construction compounds should be assessed using BS 4142. The ES assesses noise from construction compounds using BS 5228-1. SNDC noted that percussive piling is not considered to be appropriate. SNDC noted that outdoor amenity space of NSRs should be assessed, and evenings and weekends should be assessed. The assessment was amended in the ES to consider outdoor amenity space, and consider the early morning period to consider worst-case impacts. The DCEMP should be provided near to decommissioning, and be covered by a condition.
10 June 2026	Relevant Representation	Adequacy of the assessment of noise and vibration during construction and operation. Concern of the assessment of low frequency noise from the BESS and substations. SNDC request the assessment to also consider the evening (19:00 – 23:00) hours. Concern over the practicality and adequacy of proposed operational noise mitigation measures. SNDC have requested further details of the assumptions used within the assessment.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		SNDC express concern on using horizontal directional drilling and driven piles due to noise and vibration impacts. An appendix produced by Adrian James Acoustics was also provided, with 17 specific queries on the ES Noise and Vibration chapter.
8 September 2026	Meeting	SoCG Meeting on Noise.
Air Quality		
27 th November 2024	Virtual Meeting	Background pollutant concentrations were discussed, and it was agreed that data from the latest 2021-based DEFRA background maps would be used in the air quality assessment.
11 th November 2025	Virtual Meeting	Statutory consultee comments on Chapter 13: Air Quality of the PEIR were discussed. SNDC confirmed that the air quality assessment methodology presented in the PEIR was accepted. Use of latest 2024 monitoring data from SNDC was agreed and subsequently provided by SNDC.
Socio-Economics		
9 January 2026	Virtual Meeting	• Employment, Skills and Supply Chain Strategy (“ESSCS”) Workshop. • Provided an outline of the Applicant’s proposed Outline ESSCS demonstrating alignment 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

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		ESSCS to shape a targeted and deliverable Outline ESSCS.
09 September	Meeting	SoCG meeting on Planning, EiA, Socioeconomics and Waste.
Ground Conditions		
26 September 2024	Email Correspondence	The Applicant requested information relating including the locations/presence of designated Contaminated Land, and private water supplies registered pursuant to the provisions of the Private Water Supply Regulations 2016. SNDC provided an initial response by email on 02 October 2024, with further private water supplies information provided by email on 01 April 2025.
11 November 2025	Virtual Meeting	The only ground conditions related item raised by SNDC's Environmental Health Officer was to check whether any of the historical RAF airfields within the site were equipped with a FIDO ("Fog Investigation and Dispersal Operation") system. The Applicant stated that they did not believe either RAF Hardwick or RAF Seething were fitted with such a system, but agreed to review as part of the on-going preparation of the ES. The Applicant requested a check of whether any additional private water supplies had been registered since the provision of data in April 2025. In a subsequent email, SNDC confirmed no additional private water supplies had been registered.
08 September 2026	Virtual Meeting	SoCG meeting on Ground Conditions.
Cultural Heritage		
25 February 2025	Scoping Opinion	Identification of non-designated heritage assets

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Reference to levels of harm Consideration of construction phase impacts (particularly traffic routes).
6 August 2025	PEIR Response	Criteria and assessment of non-designated heritage assessments Request for draft heritage assessment to be sent to SNDC before submission of DCO application Landscaping mitigation and how this could impact historic environment
11 November 2025	Virtual Meeting	Meeting to discuss assessment methodology, heritage-specific viewpoint locations and key receptors.
12 November 2025	Email Correspondence	Heritage-specific viewpoint locations were emailed by the Applicant to SNDC. SNDC responded to say it would be useful to agree levels of harm prior to DCO submission
26 November 2025	Email Correspondence	Update on programme
12 January 2026	Email Correspondence	Update on ES deadline
9 February 2026	Email Correspondence	Draft of the Setting Assessment for the scheme sent to SNDC for comment
11 February 2026	Email Correspondence	Comment from SNDC about layout of Setting Assessment and preference for separate figures
10 June 2026	Relevant Representation	Response to DCO application
21 September 2026	Meeting	SoCG Meeting - Ecology, Landscape and Heritage