



East Pye Solar

Statement of Common Ground: National Highways

Revision 1

October 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/9.12

Rule 8(1)(e) Infrastructure Planning (Examination Procedure) Rules 2010

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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 National Highways (NH). Collectively, the Applicant and NH 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 NH.
- 1.3.2 This SoCG is a 'live' document and will be amended as the Examination progresses, including as more information becomes available and as a result of ongoing discussions between the parties to enable a final version to be submitted to the ExA.
- 1.3.3 The SoCG is intended to provide information for the Examination process, facilitate a smooth and efficient Examination, and manage the amount of material that needs to be submitted. For the purposes of Examination, this SoCG addresses key topic areas set out in **Table 1.1**. Each area of the topic has a unique reference which relate to the topic matter.

Table 1.1: Topic Referencing

Topic	Reference
Transport and Access	NH TA

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 National Highways

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 NH at the point of this document being published.

3.2 Transport and Access

Table 3.1: Transport and Access

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NH TA - 1	Environmental Statement (ES) / Strategic Road Network (SRN)	Transport Assessment (Part 1) [APP-174] Transport Assessment (Part 3) [APP-176] Outline CTMP [APP-201]	Whilst the site of the development is relatively remote from the SRN, NH requires further detail from the Applicant to provide assurance that the SRN junctions will not be adversely affected by construction traffic. Following discussions with the Applicant team, NH's main focus is on the A47/A140 junction.	An initial Technical Note was shared with NH on 12 December 2025, which contains further information on the traffic and transport impacts on the SRN. A revised Technical Note is also included in Appendix B.4 of ES Volume 3, Appendix 11.1 -Transport Assessment (TA) [APP-174 to APP-177] . This, alongside the management measures set out in the Outline Construction Traffic Management Plan (Outline CTMP) [APP-201] and an AIL report appended within Appendix D of the TA (Part 3) [APP-176] is considered by the Applicant to provide sufficient information on impacts on the SRN associated with construction traffic. More detail is provided in the SoCG matters below.	Under Discussion
NH TA - 2	ES / Assessment of SRN junctions	Transport Assessment (Part 1) [APP-174] Outline CTMP [APP-201]	6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 - Transport Assessment (Revision 1) - Part 1 (APP 174) considers the impact on flows on the SRN links in the context of IEMA guidelines. However, there is no information on the impacts at junctions, which is a more critical concern for NH. This information is requested, including an assessment of Personal Injury Collisions (PICs) at these locations. NH generally requires traffic modelling to be undertaken if a junction is forecast to experience an increase of over thirty in the peak hour, although further assessment may be needed if the peak shoulders are affected.	Appendix B.4 of the TA (Part 1) [APP-174] is a Technical Note which details the impact of construction traffic on the SRN, and sets out an impact assessment of relevant SRN links in alignment with IEMA Guidelines. Baseline flows on the SRN have been collected from WebTRIS and growthed to the peak construction year of the Scheme (2029). Trip generation and distribution calculations are also presented within the Technical Note. As detailed in the Technical Note, the SRN link with the highest level of anticipated construction vehicle movements from the Scheme is the A47 between the A11 and A140 junctions. This sits at a peak daily flow of 27 HGVs (54 movements) and 92 cars, shuttles and LGVs (184 movements). Over the course of a proposed working day, this is not anticipated to exceed 30 vehicles per hour. Proposed construction working hours are detailed in the Outline CTMP [APP-201]. As detailed within the Technical Note, percentage impact from construction traffic on the SRN is evidenced to be negligible (less than 0.3% increase on each respective link), considerably lower than IEMA thresholds It is therefore considered that the impact of the Scheme on the SRN (A47 and A11) is not significant.	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NH TA - 3	ES / Cumulative assessment	Transport Assessment (Part 1) [APP-174]	NH requests that a more granular assessment of the cumulative impact of construction traffic from multiple projects is provided. Particular consideration is requested of the combined impact of the proposed development with the Norwich to Tilbury project at the A47/A140 junction is requested.	A more granular assessment of cumulative impact is provided within Appendix B.4 of the TA (Part 1) [APP-174] , including an evaluation of the cumulative developments included within the assessment and their respective peak development flows. As stated in this Technical Note, percentage impact on NH links does not exceed IEMA thresholds, having a negligible impact on the SRN.	Under Discussion
NH TA - 4	Outline Construction Traffic Management Plan (OCTMP)	Transport Assessment (Part 1) [APP-174] Outline CTMP [APP-201]	Whilst the Outline CTMP is considered to be generally robust, NH would like to see the document strengthened in a number of areas to provide sufficient assurance that the SRN will not be adversely impacted. Evidence showing traffic will stay below thirty vehicles per hour at key junctions should be provided in the document. This should be augmented by clear information on how trips are distributed and assigned to different routes. Defined traffic limits (capped to the numbers contained in the CTMP) should be included in the CTMP. Effective monitoring arrangements should be set out with agreed actions and potential measures if they are exceeded. It should be clear in the document how NH would be involved in this process. NH would like to see the Construction Worker Travel Plan (CTWP) strengthened, to include a limit on the number of single-occupancy car trips to enable an agreed single-occupancy car share ratio to be achieved.	Appendix B.4 of the TA (Part 1) [APP-174] is a Technical Note which details the impact of construction traffic on the SRN and sets out the anticipated construction traffic trip generation and distribution on the SRN, alongside an impact assessment in alignment with IEMA Guidelines. The Technical Note details the proposed trip generation and distribution of construction traffic onto the SRN, alongside the methodology for how this was calculated. As detailed in the Technical Note, the SRN link with the highest level of anticipated construction vehicle movements from the Scheme is the A47 between the A11 and A140 junctions. This sits at a peak daily flow of 27 HGVs (54 movements) and 92 cars, shuttles and LGVs (184 movements). Over the course of a proposed working day, this is not anticipated to exceed 30 vehicles per hour. Proposed construction working hours are detailed in the Outline CTMP [APP-201]. Given the proposed trip generation and percentage impact on the network (as shown in Appendix B.4 of the TA (Part 1) [APP-174]), the Applicant does not consider it necessary to include a defined cap on construction vehicle movements or limit on single-occupancy car trips. Management and mitigation measures, including the provision of staff minibuses, is detailed in the OCTMP [APP-201]. The Applicant welcomes further engagement with NH to discuss monitoring measures, actions and involvement in the process.	Under Discussion
NH TA - 5	Abnormal Indivisible Loads (AIL)	Transport Assessment (Part 1) [APP-174] Transport Assessment (Part 3) [APP-176] Outline CTMP [APP-201]	It is noted that the Applicant has not yet determined the routes it will use for Abnormal Indivisible Loads (AILs). Whilst it is understood why there is a focus on the use of the local roads to access construction sites, the Applicant should be aware that there are some existing constraints to the use of some AILs on	The TA [APP-174 – APP-177] and Outline CTMP [APP-201] provide an overview of the anticipated routeing for AILs on the Local Road Network (LRN) and Major Road Network (MRN). An AIL report has also been prepared and is detailed in Appendix D of the TA (Part 3) [APP-176] . The AIL report provides a	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			the SRN. It should also be noted that NH follows a government Water Preferred Policy, which means we would expect the loads to arrive via the nearest suitable port of entry. NH will need to agree the routeing of any AILs that intended to use the SRN. Further guidance can be found at Abnormal loads and the ESDAL system. Although it is understood that the routes will be finalised in advance of construction, post-consent, NH recommends discussing this matter before a decision is made on the proposed route to ensure there is a workable and acceptable strategy in principle. N H is content that the AIL routing can be dealt with post-consent but notes the potential risk to the Applicant.	more detailed overview of proposed routeing and access points onto the SRN. Routeing proposals are designed in alignment with access being made via a suitable nearest port of entry. As detailed in the Outline CTMP [APP-201], all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with NH, relevant Local Highway Authorities (LHA), structures' owners and the Police where necessary.	
NH TA - 6	Draft DCO	Draft DCO [AS-032] Outline CTMP [APP-201]	Requirement 15, which relates to the CTMP, in point (3) refers to consultation with the relevant highway authority. NH requests that the Requirement is amended to reflect its specific responsibility for the SRN junctions that may be affected by the CTMP (such as the A47/A140 junction). The Requirement could refer to NH specifically or could state that consultation should take place with the "relevant highway authorities."	The Applicant agrees that the detailed Construction Traffic Management Plan (CTMP), secured by a DCO Requirement, will be developed and agreed with Norfolk County Council, in its role as Local Highway Authority (LHA), and National Highways prior to the commencement of construction. The Applicant will update the Draft DCO accordingly at Deadline 1.	Agreed in Principle – subject to review and agreement of the updated Draft DCO.
NH TA - 7	Construction Worker Travel Plan	Outline CTMP [APP-201]	Further information concerning the Strategic Road Network (SRN) and the Construction Worker Travel Plan (CWTP) is required within the Construction Traffic Management Plan (CTMP) to provide greater assurance that construction traffic will be effectively managed and that potential impacts on the highway network will be appropriately mitigated.	The Applicant is committed to maximising sustainable workforce travel. A detailed Construction Travel and Workforce Plan (CTWP), secured through a DCO Requirement (Requirement 15) and developed alongside the CTMP, will be prepared and agreed with Norfolk County Council as the Local Highway Authority and National Highways prior to the commencement of construction.	Under Discussion

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited (the Applicant) and National Highways, 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 National Highways.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

A.1.1 The parties have engaged throughout the pre-application stage, including technical 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.

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

Table A.1: Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
Transport and Access		
27 November 2025	Virtual Meeting	• Construction traffic trip generation and distribution • Traffic impact on Strategic Road Network (SRN) • Traffic management measures • Cumulative effects • NH to review full documents when available
9 December 2025	Email	• Stantec sent Technical Note regarding Transport and Access proposals (in relation to NH) to NH
19 February 2026	Email	• NH to review CTMP when available post-submission
30 July 2026	Virtual Meeting	• Transport assessment of NH network
08 September 2026	Email	• Sharing first draft of SoCG

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
25 September 2026	Email correspondence	• Sharing updated positions of SoCG prior to Deadline 1.