



East Pye Solar
Written Summary of the Applicant's Oral
Submissions and Responses at Issue Specific
Hearing 1 and Response to Action Points

Revision 1

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The Infrastructure Planning (Examination Procedure) Rules 2010

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1 Introduction

- 1.1.1 This document summarises the oral submissions made by East Pye Solar Limited (the Applicant) at Issue Specific Hearing 1 (ISH1) held on Wednesday 16 and Thursday 17 September 2026 in relation to the application for development consent (the DCO Application) for East Pye Solar (the Scheme).
- 1.1.2 Where the Examining Authority (the ExA) requested further information from the Applicant on specified matters, or the Applicant undertook to provide further information during the course of ISH1, that further information is either set out in this document or provided as part of the Applicant's Deadline 1 submissions.
- 1.1.3 This note does not purport to summarise the oral submissions of other parties, and summaries of submissions made by other parties are only included where necessary to give context to the Applicant's submissions.

2 Summary of the Applicant's Oral Submissions at ISH1

Table 2.1 Summary of the Applicant's Oral Submissions at ISH1

Agenda Item	Comment
1. Welcome, introductions and arrangements for the hearing	The ExA opened the hearing at 2.00pm on Wednesday 16 September 2026 and explained that it would follow the Agenda for Issue Specific Hearing 1 (ISH1) [EV2-001]. The ExA did not take formal introductions; parties introduced themselves when speaking. The following parties spoke at ISH1 on behalf of the Applicant: • Toby Yeates, Associate at Pinsent Masons LLP (solicitors for the Applicant) • Si Gillett, Independent Consultant (matters in relation to National Grid) • Ian Douglass, Stantec (site selection and scope of the development), • Richard Fisher, Stantec (flood risk and drainage) (virtual) • Dave Elvin, Island Green Power (matters in relation to National Grid) (virtual) • Adam Crompton, Island Green Power (technical and design) • Russell Buckley, Stantec (EIA) • Tim Hapgood, Stantec (transport)
2. Applicant's approach to site selection and alternatives, to include:	The ExA queried the transition from Norwich Main Substation to the Great Moulton point of connection, and asked at what point the Applicant considered Norwich Main to be unavailable. Toby Yeates, on behalf of the Applicant, explained that the Applicant had engaged with National Grid in respect of Norwich Main substation and had considered suitable solar sites within a 20km radius of that point of connection. National Grid subsequently advised that

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a) Norwich Main Substation point of connection	suitable capacity would not be available at Norwich Main and directed the Applicant further south, identifying available capacity on the overhead line in the vicinity of Great Moulton. Mr Yeates explained that the first four stages of the six-stage site selection exercise set out in the Site Selection Assessment (SSA) [APP-215] applies from Norwich Main and confirmed that the location of the connection infrastructure and solar generating areas were not finalised at that the end of those stages. Whilst Stages 1-4 of the SSA had identified solar sites which are suitable by reference to the national policy tests, the process had not concluded. Mr Yeates confirmed that the change of the point of connection to Great Moulton did not restart the site selection process as that was not necessary. Referring to paragraph 4.6.1 of the SSA, he explained that the sites identified through Stages 1-4 remained within 20km of Great Moulton and therefore remained suitable sites within the appropriate search area from the new connection. He also referred to paragraph 4.3.9 of NPS EN-1 which confirms that a site does not need to be the "best" site. As per paragraph 4.3.15 of NPS EN-1, the test is that applicants "are obliged to include information about the reasonable alternatives they have studied in their ES". Stages 5 and 6 involved additional site selection assessment work following the identification of Great Moulton. Mr Yeates confirmed that, had Great Moulton been the starting point from the outset, all of the proposed solar sites would still have emerged as suitable sites but alternative sites closer to Great Moulton were also considered through Stages 5 and 6. In summary, the Applicant's position is that the solar sites identified are suitable, and the approach remains consistent with the site selection methodology and the relevant national policy tests notwithstanding the move in point of connection. Dr Annetta Berry (BEPS) asked why the Applicant did not consider North Anglia Node A as the point of connection. Mr Yeates explained that National Grid advised that whilst there was insufficient capacity at Norwich Main, capacity was available on the overhead line network. The grid connection agreement identified the point of connection now proposed. He noted that paragraph 4.3.24 of

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	NPS EN-1 requires all suitable sites to be explored and that this does not preclude other projects from connecting into other available connection points. Dave Elvin, on behalf of the Applicant, added that National Grid had confirmed that there was no ability to extend Norwich Main. National Grid therefore offered a connection on the overhead line, provided that the Applicant secured the land and consent for a new National Grid Substation. This happened before the East Anglia connection node was envisaged, as no other projects were then seeking to connect in the area. The connection nodes on the TEC Register are placeholders with no fixed location: they arise from National Grid's connections reform process and relate to connections after the Applicant's. Sandra Mullett (BEPS) asked why all potential sites had not been compared against the Horlock Rules (National Grid's guidelines for siting and designing new substations). Mr Yeates clarified that the substation was sited through a separate exercise from the one used to choose the solar sites, referring to sections 3.3 and 3.4 of the SSA, which expressly confirms that both the Horlock Rules and the and Holford Rules formed a key part of the assessment.
b) Search area methodology	The ExA asked what factors informed the selection of the 20km search radius referred to in ES Volume 1, Chapter 5 Reasonable Alternatives and Design Evolution [APP-041]. Mr Yeates explained that the approach is consistent with that adopted on other projects brought forward by Island Green Power (part of the same corporate group as the Applicant), including West Burton Solar Project and Cottam Solar Project. Ian Douglass, on behalf of the Applicant, added that this decision to use a 20km search radius on other schemes also takes into account of topography, irradiance levels, land availability, scheme scale and generating capacity, as well as highways, watercourse and other infrastructure constraints. The ExA asked whether the radius changed when the point of connection moved to Great Moulton.

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	Mr Yeates explained that the centre point moved, but the 20km search radius remained the same. Paragraph 4.2.4 of the SSA identifies search radii on other projects ranging from 5km to 20km (for example Longfield (5km), Gate Burton (8km) and Tillbridge (15km)), so a 20km radius represents a precautionary approach. Dr Berry queried apparent inconsistencies in the mapping used within the SSA and questioned whether different criteria had been applied at different stages of the assessment. Mr Yeates explained that Stages 1-3 of the site selection exercise applied key factors derived from NPS EN-3. This sought to exclude Best and Most Versatile ("BMV") agricultural land where possible. At Stage 4 of the solar site selection, the Applicant recognised that avoiding BMV land entirely would not be possible and brought such land back into consideration, consistent with national policy. Paragraph 2.10.23 of NPS EN-3 states that "It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land". Both Stage 5 (which tested whether any BMV-free alternatives could reasonably replace the preferred sites) and Stage 6 (assessing alternative development zones including BMV land), each from the Great Moulton point of connection, identified no suitable sites. Further, updated Defra predictive BMV mapping confirms that BMV land cannot be avoided within 20km of Great Moulton for a scheme of this scale.
c) Great Moulton site selection	The ExA asked what the principal reason was for selecting Great Moulton as the preferred location. Mr Yeates referred to sections 3.3 and 3.4 of the SSA, which establish the overarching principles for the site selection exercise for the new National Grid substation. The key factors included suitable transport and access arrangements and proximity to the overhead line network, in addition to grid capacity and the application of the Horlock and Holford Rules. The ExA asked whether Great Moulton would have emerged as the preferred location had Norwich Main remained available.

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	Mr Yeates explained that the solar site assessment and the National Grid Substation assessment were distinct exercises. The solar site search around Norwich Main (an existing point of connection) focused on the national policy tests for identifying suitable solar sites, whereas a new point of connection is guided from the outset by National Grid's advice on where capacity is available, with the site then selected by reference to the Horlock and Holford Rules, national policy, viability (including transport and access) and proximity (to the overhead line network). The ExA asked directly whether Great Moulton is the optimum location for the National Grid Substation. Mr Yeates reiterated that the national policy does not require an optimal site, although Mr Yeates confirmed that Great Moulton is suitable and meets all of the relevant assessment criteria. The ExA queried how the concentration of existing and proposed energy infrastructure near Norwich Main, and then Great Moulton, had been considered. Russell Buckley, on behalf of the Applicant, explained that from an EIA perspective, the cumulative assessment in the ES considered all qualifying energy schemes within a 25km radius. Mr Yeates added that paragraphs 2.10.17 and 2.10.18 of NPS EN-3 support the siting of schemes near to available grid capacity. On that basis, the Applicant sought to use Norwich Main as its point of connection but was directed elsewhere by National Grid, and cumulative effects were assessed once the solar site and site for the new National Grid substation had been identified. In response to a query on the substation location by Dr Berry (BEPS), Mr Yeates explained that three possible substation sites were identified in the SSA. The SSA explains how the planning application for a neighbouring solar scheme influenced the move to the site now proposed. Mr Elvin added that the Applicant was aware of that scheme from early on, and that the move further north within Site 1 resulted from survey feedback from the environmental consultants.

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	In response to Cllr Catchpole (county councillor, Long Stratton division), Mr Yeates explained the distinction between the effects of a development and the policy tests for identifying a suitable site. For example, paragraph 5.10.5 of NPS EN-1 recognises that virtually all such projects will have adverse landscape effects but landscape matters do not form part of the key site selection criteria within NPS EN-3. Mr Yeates agreed to respond in writing to each criterion raised. <i>See the Applicant's written summary of the oral submissions made at OFH1 and OFH2.</i> <i>See also the Applicant's response to the Actions Point 1, submitted alongside this written summary at Deadline 1.</i>
d) Role of land availability in site selection	The ExA asked whether environmental suitability informed landowner engagement, or whether landowner engagement materially influenced which locations were assessed. Mr Elvin explained that the process begins by identifying a point of connection and search radius. Environmental constraints are then assessed before landowners are approached, and landowner engagement then informs whether land is available. He described the process as iterative. Mr Elvin confirmed that the environmental desktop assessment occurred first, with landowner feedback then used to refine it. The ExA asked for information demonstrating the chronology of that process. <i>See the Applicant's response to the Actions Point 2, submitted alongside this written summary at Deadline 1.</i> Mr Yeates observed that, whilst there is a clear chronology in principle, environmental suitability and land availability overlap in practice. The SSA demonstrates suitability in environmental terms under the policy tests, whilst the compulsory acquisition Guidance requires the Applicant to show that reasonable alternatives and voluntary agreements have been explored. The ExA sought clarity on whether one process had materially influenced the other.

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	Mr Yeates agreed to provide a written response, although Mr Yeates explained that willing landowners had not influenced the subsequent environmental assessment process: the two processes ran in parallel, and a willing landowner does not make a site more or less suitable against the policy tests. <i>See the Applicant's response to the Actions Point 3, submitted alongside this written summary at Deadline 1.</i> Mr Elvin explained that the environmental screening involved a desktop planning review of publicly available data on constraints such as flood risk and heritage assets across the 20km search area, and agreed to provide it. <i>See the Applicant's response to the Actions Point 4, submitted alongside this written summary at Deadline 1.</i> The ExA asked whether environmentally preferable land would have been assessed if not controlled by a willing landowner. Mr Yeates again reiterated that the national policy test is to identify suitable land using the criteria within the policy and is not to identify preferable land. The SSA shows at each stage of the site selection process the Applicant has applied national policy, not landowner negotiations, to determine if sites are to be included or excluded. Mr Yeates agreed to respond to Dr Berry in writing with written confirmation of when landowner engagement began and in respect of the Countryside Stewardship scheme. <i>See the Applicant's response to the Actions Points 5 and 6, submitted alongside this written summary at Deadline 1.</i> Dr Berry asked why, given the loss of the Norwich Main connection, the lack of available non-BMV land and the Clean Power 2030 regional capacity ranges, the Applicant had not decided against developing the project. Mr Yeates explained that the Scheme is an NSIP with a 500MW grid connection agreement (see the Grid Connection Statement [APP-207]) and that NPS EN-1 establishes a clear need

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	for such development (see the Statement of Need [APP-206]). Under paragraph 4.3.23 of NPS EN-1, the relevant alternatives are those capable of delivering the same capacity in the same timescale, not a smaller scheme or no scheme. Hence, the Applicant had not considered those options. Mr Elvin added that the connection has been deemed “ready and needed” under NESO’s Connections Reform process. Si Gillett, on behalf of the Applicant, also explained that the regional capacity ranges are a prioritisation tool, not targets (paragraph 3.2.6 of NPS EN-1). <i>See the Applicant’s response to the Actions Point 7, submitted alongside this written summary at Deadline 1.</i>
e) National Grid substation assessment	Mr Douglass explained that Options 4A and 4B are compared in Table 3.2 of the SSA. Option 4A was discounted owing to the planning consent for a neighbouring solar scheme (one of a number of considerations) and surface water and flood zone constraints, whereas Option 4B offered greater opportunity to use existing landform for screening, landscape screening being a leading factor. Mr Yeates explained that both substation options were assessed in the PEIR, that the conclusions on likely significant effects did not change and that the Scheme as now proposed, including the new National Grid substation, has been fully assessed. <i>See the Applicant’s response to the Actions Point 8, submitted alongside this written summary at Deadline 1.</i>
3. Scope of the proposed development This includes:	<u>Applicant’s overview of the proposed development</u> Mr Yeates explained that the Scheme is described in ES Volume 1, Chapter 4 - The Scheme [APP-040]. The works forming the authorised development are set out in Schedule 1 of the Draft DCO [AS-032]: a solar generating station of over 100MW (an NSIP under section 15 of the Planning Act 2008) and associated development, including the BESS and the new National Grid Substation (Work Nos. 2-11). The maximum parameters of the Scheme are secured in the Design Principles, Parameters and Commitments (DPPC) [APP-213] under Requirement 5

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a) Applicant's overview of the proposed development (no more than 15 minutes), to include an outline of the location and description of the principal works and the applicant's approach to design parameters	of the Draft DCO [AS-032]. These parameters have been assessed in the ES on a reasonable worst-case basis; the final design will be within them, to ensure that the Scheme's actual effects will be no worse than those reported. <u>Site Overview</u> Mr Douglass presented ES Volume 2, Figure 1.1 - Site Location Plan [APP-057] and Figure 4.1- Indicative Masterplan [APP-059]. The Order Limits cover approximately 1,212 hectares of land within South Norfolk, comprising the sites (approximately 1,051 hectares) and the Cable Route Corridor (approximately 159 hectares), as described in ES Volume 1, Chapter 3 - The Order Limits [APP-039]. Mr Douglass explained: • Site 1, south of Great Moulton, comprises approximately 73.6 hectares (Subsites 1A to 1D) and is crossed diagonally by an existing overhead line. Subsite 1B contains the proposed National Grid Substation, which would be owned and operated by National Grid, together with a 400kV Project Substation. • Site 2 comprises approximately 99.9 hectares (Sites 2A, 2B and 2C). The adjacent BESS site comprises approximately 22.9 hectares and would accommodate a further 400kV Project Substation. • Site 3 consists of approximately 57.8 ha; Site 4 of approximately 100.7 ha (Sub-Sites 4A and 4B); Site 5 of approximately 90.5 ha (Sub-Sites 5A and 5B); and Site 6 of approximately 18.0 ha. • Sub-Site 4B is proposed to accommodate a 132 kV Project Substation, while Sub-Site 5A is proposed to host a 400 kV Project Substation. Site 6 remains within the Order Limits but excludes Solar PV Panels and is for biodiversity mitigation. • Site 7 (Situated east of Tasburgh and to the north of Hemphall) consists of approximately 328.1 ha (Sub-Sites 7A to 7L). Sub-Site 7F is proposed to accommodate a 132 kV Project Substation.

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	<u>Cable Route Corridor</u> The Cable Route Corridor runs between the 10 Sites, within which the underground 33kV, 132kV and 400kV cables will be laid, interconnecting between the Sites and Sub-Sites. The Order Limits width of the CRC is typically 50m, narrowing to approximately 13m in places owing to environmental constraints and widening up to 405m to allow flexibility for detailed design and temporary construction compounds. A construction working width of 25m is proposed. <u>Design parameters</u> The design parameters are set out within the DPPC and secured through Requirement 5 of the Draft DCO [AS-032]. The DPPC secure the size (maximum or minimum footprint, width and height) of the different elements of the Scheme and offsets from features such as Ancient Woodland, trees and hedgerows, PRoW and residential properties, and are the basis of the EIA in alignment with the Rochdale Envelope approach. <u>Indicative Masterplan</u> The ExA asked how indicative the Indicative Masterplan was and whether the solar PV areas shown represented fixed locations. Mr Yeates explained that the Indicative Masterplan [APP-059] is entirely indicative, in that the Works Plans [AS-002] and [AS-003] are the secured documents to be relied upon as the certified document. The masterplan identifies the broad areas within which infrastructure may be located (for example, Work No. 4 identifies the maximum area for the National Grid Substation), while the detailed parameters of the final substation are secured through the DPPC. Final micro siting will be determined at the detailed design stage, subject to the relevant approvals. The ExA asked whether the Indicative Masterplan is nevertheless a useful document for understanding the Scheme.

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	Mr Yeates responded that, insofar as the masterplan aligns with the Works Plans, it accurately reflects the broad areas in which the infrastructure may be located. He agreed that it does provide a helpful overview, subject to the caveat that it is not a certified document. A representative of BEPS asked how residents could determine the distance between their property and the proposed development. Mr Douglass explained that the Works Plans are scaled plans and can therefore be measured, which is the conventional approach for DCO applications. Mr Yeates added that the scale of plans is prescribed by legislation and that the Applicant has complied with those requirements, and that the illustrative masterplan includes scale information too. Given the scale of the Scheme, Mr Yeates added that it would not be proportionate to provide measurements from every property to every component; instead, buffers from residential properties are secured. The ExA requested further material where properties are close to the works. Mr Yeates agreed to consider this and suggested one option might be illustrative material showing buffers around key infrastructure (for example 50, 100 and 200 metres). <i>See the Applicant's response to the Actions Points 9, submitted alongside this written summary at Deadline 1.</i>
b) Proposed National Grid substation (Work No. 4)	The ExA noted apparent confusion as to whether the proposed National Grid Substation would be delivered under the DCO or under a separate planning application. Mr Yeates clarified that Work No. 4 in Schedule 1 of the Draft DCO [AS-032] facilitates delivery of the National Grid Substation under the DCO. Article 36(2) of the dDCO confers the benefit of Work Nos. 4 and 5 on both the undertaker and National Grid, so that those works could be carried out by either party. This reflects the existing connection agreement, which obliges the Applicant to secure the land and consent for the new substation. Mr Yeates explained that the DCO must include the works necessary to deliver the new National Grid Substation, but this would not oblige National Grid to carry out the works or prevent National Grid from seeking a separate planning permission. Under Requirement 5, the

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	final design details would confirm whether the powers for the new National Grid substation were intended to be exercised under the DCO. Mr Gillett, on behalf of the Applicant, explained that the Applicant has a connection agreement and has been informed that it has been reprioritised within the connections process. It expects an agreement to vary that connection agreement, although no revised agreement has yet been issued by NESO. National Grid's representations were therefore somewhat hypothetical, and no firm changes have been communicated to date. He noted that NESO was looking to provide updated offers by the end of March 2027, subject to its own programme. Mr Yeates emphasised that whether the substation might be located elsewhere was a matter for National Grid, and that a draft Statement of Common Ground (SoCG) with National Grid would be submitted at Deadline 1. Including the National Grid Substation within the consent provides the certainty of deliverability which the Applicant is required to demonstrate. The ExA asked whether the design parameters for the substation had been influenced by the possibility of the National Grid Substation also serving the proposed Tasway Energy Park. Mr Yeates explained that the siting and design of the substation had been determined through the site selection process for, and based on the requirements of, the East Pye Solar Scheme. Mr Yeates confirmed that the substation design parameters had been shared with National Grid. The ExA observed that, if Tasway Energy Park were to progress, the substation may need to be larger and could serve both projects. Mr Yeates responded that the substation had been designed with sufficient capacity and flexibility to accommodate the Scheme as well as other potential projects. The ExA requested further explanation of the relationship between the substation, Tasway Energy Park and the size of the substation, and of the implications of this. <i>See the Applicant's response to the Actions Points 10, submitted alongside this written summary at Deadline 1.</i>

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	Dr Berry asked how the substation land could be compulsorily acquired if National Grid brought forward its own substation. Mr Yeates explained that the compulsory acquisition powers sought within the DCO are inherently limited: Article 21 provides that the undertaker may only acquire so much of the Order Land as is necessary. If National Grid delivered a separate substation, there would be no justification to exercise those powers because the new substation under the DCO would no longer be necessary. NCC suggested that there is no control in the DCO preventing the National Grid Substation land being acquired if a substation is delivered elsewhere. Mr Yeates responded that Work No. 4 would form part of the final detailed design submission pursuant to Requirement 5 (noting that the DCO was being updated for Deadline 1 to include it), and that the DCO therefore already contains controls to prevent that scenario arising. The ExA also asked whether, if the National Grid Substation were delivered under a separate planning permission, a mechanism would be needed to avoid a stranded asset. Mr Yeates stated that this was a hypothetical scenario which would have to be addressed through any future consenting process. Grampian-style restrictions had been considered in other examinations and no Secretary of State decision on solar NSIPs has found the necessity for one. He referred to the King's Counsel opinion submitted in the Five Estuaries Offshore Wind Farm examination. Mr Yeates also referred to Requirement 2 of the dDCO, under which no part of the authorised development may commence until a written scheme setting out the phasing of the development, including a timetable for each phase, has been submitted to the relevant planning authority. The delivery, or not, of the new substation would form part of that timetabling in addition to the final design being submitted. <i>See the Applicant's response to the Actions Points 11, submitted alongside this written summary at Deadline 1.</i>

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	Dr Berry (BEPS) asked what would happen if the National Grid Substation were located elsewhere, and Ms Parekh (SNDC) raised the legal controls and whether the substation has capacity for future projects. Mr Yeates responded that any substation proposed in a different location would need its own consent, including for any new cable corridor. The Applicant was not promoting such a scenario and it would be more appropriate for National Grid to explain its own intentions. In relation to future projects, Mr Yeates stated that the Applicant would consider whether further clarification was required on downstream effects and future use of the substation, noting that the cumulative assessment considered both long-list and short-list schemes. <i>See the Applicant's response to the Actions Points 12, submitted alongside this written summary at Deadline 1.</i> In relation to legal controls, Mr Yeates referred to Requirement 2 (Phasing) and Requirement 5 (Design), which operate in a similar manner to planning controls, and noted that failure to comply with a DCO requirement is an offence under the Planning Act 2008. The Applicant does not consider any additional control to be necessary. At the ExA's request, Mr Yeates confirmed that illustrative material could be provided to show the infrastructure associated with Work No. 4 and how it may appear in practice. <i>See the Applicant's response to the Actions Points 13, submitted alongside this written summary at Deadline 1.</i> In relation to Table 4.1 of ES Chapter 4 [APP-040], Mr Yeates confirmed that the maximum busbar height (15m, as secured in the DPPC) is already included within the table but, owing to a formatting error, does not appear against the National Grid substation. This will be rectified. <i>See the Applicant's response to the Actions Points 14, submitted alongside this written summary at Deadline 1.</i>

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c) Overhead transmission lines (Work No.5)	The ExA asked for a short summary of the overhead transmission line works, noting that the relevant drafting in the Draft DCO [AS-032] was not entirely clear. Mr Yeates explained that Work No. 5 relates to the overhead lines: • Work No. 5A covers the new overhead line works; • Work No. 5B covers the works associated with the new lines and existing lines; • Work No. 5C covers the modifications to the existing overhead lines; and • Work No. 5D covers the removal works. Post hearing note: This is further explained in the Applicant's response to written questions. Mr Douglass added that Work No. 5A comprises the works to realign the existing overhead lines into the proposed National Grid Substation, including modifications to existing pylons. New pylons would be erected and three existing pylons removed, a net increase of one pylon. The pylon height parameters are set out within the DPPC. The ExA asked whether the proposed pylons, which could be up to 61 metres in height, would be the same height as the existing pylons. Mr Yeates confirmed that the proposed overhead line structures would involve an increase in height (the existing pylons are approximately 53 metres high) and that the effects of that increase have been assessed in the ES. <i>See the Applicant's response to the Actions Points 15, submitted alongside this written summary at Deadline 1.</i>
d) Project substations (4400 kV and 132kV) (Work No.3)	The ExA noted that the Scheme proposes up to three 400kV substations and up to three 132kV substations and asked why the Scheme requires more substations than some other projects. Mr Gillett explained that the substations gather electricity generated across the Scheme and transmit it via the cable route corridors to the point of connection. Their number is therefore a function of both the geographical spread of the Scheme and its electrical design. The 400kV

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	substations within Site 5 and Site 1 (adjacent to the BESS) are where electricity is gathered before higher-voltage transmission takes place. Mr Gillett confirmed that this is a scheme-specific design factor, depending on the characteristics and locations of the sites. <i>Post hearing clarification:</i> <i>All large-scale solar schemes will include transformers which gather and transmit the electricity generated at the panels. The scheme-specific element is the number, location and size of transformers included in the scheme design, which depends on the characteristics and locations of the sites.</i> <u>Air Insulated and Gas Insulated Substations</u> The ExA noted that the National Grid Substation is described as air insulated (AIS), whereas the 400kV project substations may be AIS or gas insulated (GIS), and asked about the visual differences and why this remains flexible. Mr Gillett agreed to provide comparative images and explained that a GIS has fewer components exposed to the open air. Flexibility has been retained for both the 132kV and 400kV project substations to select either technology at the detailed design stage, and both options have been assessed within the ES. <i>See the Applicant's response to the Actions Points 16, submitted alongside this written summary at Deadline 1.</i> Mr Gillett explained that the National Grid Substation has been designed to National Grid's technical specifications, which currently assume an air-insulated design. The Applicant will procure and install the project substations and has retained flexibility until detailed design, taking account of factors such as procurement timelines and equipment availability. Mr Gillett confirmed that the compounds shown on the Works Plans are based upon the (larger) footprint of AIS, and that any surplus land within them could be used for landscaping. <u>Design Principles and Securing the Design</u> The ExA encouraged the Applicant to continue discussions with the local authorities regarding how the design principles in the DPPC can be strengthened.

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	Mr Yeates confirmed that the Applicant would do so. Claire Curtis (SNDC) observed that the proposed pylons and Work No. 5 are not currently secured through a specific requirement. Mr Yeates explained that a revised dDCO will be submitted at Deadline 1. Requirement 5(1) will be amended to include Work No. 4, securing matters such as layout, scale and ground levels, and a new sub-paragraph will require Work Nos. 5 and 6 to be carried out in accordance with the DPPC. The Applicant would consider whether further detail can be incorporated into the secured documents. The ExA asked whether the BESS is also captured by Requirement 5. Mr Yeates confirmed that it is under Work No. 2 in the existing drafting. <i>See the Applicant's response to the Actions Points 17, submitted alongside this written summary at Deadline 1.</i> <u>Ecological Effects of Substation Design</u> Dr Berry (BEPS) sought a species-specific comparison of the ecological effects of AIS and GIS. Mr Yeates referred to ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] and explained that whichever option represents the reasonable worst-case scenario has already been assessed. <i>See the Applicant's response to the Actions Points 18, submitted alongside this written summary at Deadline 1.</i> <u>Location of Substations and Clustering</u> In response to Ms Mullett, who asked why the substations need to be located so closely together, Mr Gillett explained that the 400kV substation within Site 5 collects electricity from the north-eastern part of the Scheme (Sites 3 onwards) via the cable route corridor, whereas the

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	400kV infrastructure adjacent to the BESS within Site 1 serves a separate network function, providing additional electricity flow control and monitoring. Ms Read (Tivetshall Parish Council) expressed concern that residents do not know where the Project Substations may ultimately be located. Mr Yeates stated that the Applicant would signpost the relevant information in its written summary. Post-hearing note: The locations and descriptions of the 400kV Project Substations are set out within Paragraph 4.3.34 and Table 4.1 of ES Volume 1, Chapter 4 – The Scheme [APP-040], as well as Table 4.3 of the Design Principles, Parameters and Commitments [APP-213] under Work No. 3A: • BESS Site – Sheet 19 of the Works Plans Part 2 [AS-003]; • Sub-Site 1B – Sheet 19 of the Works Plans Part 2 [AS-003]; • Sub-Site 5A – Sheet 13 of the Works Plans Part 2 [AS-003]. The locations and descriptions of the 132kV Project Substation are described in Table 4.1 of ES Volume 1, Chapter 4 – The Scheme [APP-040] and Table 4.3 of the Design Principles, Parameters and Commitments [APP-213] under Work No. 3B. • Sub-Site 4B – Sheet 14 of the Works Plans Part 2 [AS-003] • Sub-Site 7F – Sheet 8 of the Works Plans Part 1 [AS-002] • Sub-Site 10C – Sheet 5 of the Works Plans Part 1 [AS-002] <u>Alternative Sites and Requirement 5</u> Ms Chandler, on behalf of Morningthorpe and Fritton Parish Council, asked where alternative locations for the Sub-Site 5A project substation had been assessed in part due to landscape concerns. Mr Yeates referred to ES Volume 2, Figure 7.7 - View Locations and Visualisations (Rev 2) [AS-009] and to the analysis of site selection and alternatives in ES Chapter 5 [APP-041].

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	<i>See the Applicant's response to the Actions Points 19 and 20, submitted alongside this written summary at Deadline 1.</i>
e) Matters relating to capacity, PV arrays, panels and overplanting	The ExA asked whether the layout and assessment are based on the 4.5m single-axis tracker panels or the 3.5m fixed panels. Mr Gillett explained that the application includes flexibility to deliver either single-axis tracker (SAT) or fixed-axis (FA) panels. Fixed panels are fixed south-facing, in rows running east to west, with a maximum height of 3.5 metres. SAT panels are generally orientated on an axis which runs north / south and they tilt to follow the sun; 4.5 metres is their maximum height, although for much of the day they would be lower. SAT panels require more land than FA per MW installed capacity, so output per acre is lower, but they generate more efficiently over the day. Flexibility is therefore sought to allow either technology to be selected at the detailed design stage. The ExA asked whether SAT panels would be spaced further apart because of their greater height. Mr Gillett confirmed that they generally require more space, and that the configuration would be determined at detailed design to optimise annual generation within the red line boundary. Asked what the PV arrays had been assessed on, Mr Gillett confirmed that the ES assesses the worst-case effects of either configuration. The ExA asked whether the land requirement would be the same if the entire site were to comprise fixed panels. Mr Gillett responded that developable area is the constraining factor. A fixed panel scheme would generally allow more panels, and a higher installed capacity, within the same area. The detailed design process will optimise the use of the land secured, and any areas not required because of the selected panel configuration are unlikely to be a significant part of a parcel.

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	The ExA referred to paragraph 4.3.14 of ES Chapter 4 [APP-040], which states that fixed arrays may be used where practical or environmental constraints prevent the use of tracking solar panels. Mr Gillett explained that tracking panels may not be suitable in: • Areas within flood zones, where moving mechanical parts may be more vulnerable. • Areas with steep gradients or other physical constraints. These matters would be considered through micro siting, detailed design and flood risk assessment, within the DCO parameters. The ExA asked whether improved panel efficiency in future could result in less land being required. Mr Gillett agreed that panel technology continues to develop: the Scheme has been assessed on current assumptions; if panel efficiency increased, the same number of panels could generate more electricity without necessarily increasing environmental effects. The proposed overplanting does not exceed sensible operational limits, and increased efficiency would lead to greater generation and contribution towards energy policy objectives; it would not mean that the Scheme footprint should be reduced. The ExA asked whether the Applicant could provide details of the panel ratings used within the assessment and explain how these compare with other solar projects, and noted that there may be situations where parts of the Scheme could potentially be omitted, particularly in cases of strong environmental concerns or where panels are located close to residential receptors. Mr Gillett agreed to provide panel ratings and comparisons with other schemes, and the proportional level of overplanting compared with other projects. Mr Gillett also agreed to provide the land requirement in paragraph 6.7.1 of the Statement of Need [APP-206] in hectares as well as acres. He explained that the acres-per-megawatt calculation follows precedent including Mallard Pass, Springwell, East Yorkshire Solar Farm and Beacon Fen Energy Park, and excludes mitigation land. The Scheme sits within the historic acres-per-megawatt range and below some of the more recent figures referenced in policy documents.

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	The ExA asked what makes this Scheme different to others where the figure appears to be lower. Mr Gillett responded that the higher range in the 2025 policy documents can make the Scheme appear unusual, whereas it is comparable with other consented schemes. Mr Yeates explained that the lower figure reflects a more efficient scheme and confirmed that the Applicant would provide a written breakdown of the calculations, including the treatment of the cable route corridor and BESS. <i>See the Applicant's response to the Actions Point 21, submitted alongside this written summary at Deadline 1.</i> Ms Parekh (SNDC) asked how long the panels would operate at maximum tilt. Mr Gillett explained that this would be approximately one hour in the morning and one hour in the evening, although the 4.5 metre height has been assessed throughout the day; a flat panel would be approximately 2.5 metres high. Dr Berry (BEPS) raised various concerns in relation to the location of fixed and tracker panels, the absence of minimum panel spacing and of a capacity cap, and the 50m offset from homes compared with 250m at The Drovers. Mr Yeates responded as follows: • Design flexibility applies across a range of Scheme components, with additional surveys and design work identifying final locations. Granting consent does not give the Applicant absolute discretion: as with an outline planning permission, final details, including layout and scale, must be submitted for approval of the relevant planning authority. • The DPPC secures minimum separation distances between modules (2.5m), including where SAT panels are used. • It is well established that a maximum generating capacity is not imposed. The Scheme has been assessed using maximum parameters and a reasonable worst-case scenario. • The limits shown on the Works Plans establish the maximum extent of development and therefore inherently secure minimum distances to residential properties. Additional

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	buffer distances (including a minimum of 50m from residential curtilage, applied case by case) are also secured through the DPPC. Residential buffers must be determined through a landscape-led design approach, so no single buffer distance can be applied universally across projects. NCC noted that it would be helpful for the Applicant to clearly explain where property-specific distances are secured within the application documents. Mr Yeates confirmed that additional explanatory text could be provided. <i>See the Applicant's response to the Actions Points 22, submitted alongside this written summary at Deadline 1.</i>
f) Battery Energy Storage System (BESS) (Work No.2)	The ExA confirmed that questions relating to the BESS would be asked in writing. Ms Mullett (BEPS) noted that the BESS connection is at Gate 1, and the ExA asked the Applicant to identify where this is addressed within its response to relevant representations. Post-hearing note: See, for example, the response to APL-008 in The Applicants Response to Relevant Representations Part 5 - By Theme [PDA-012].
g) Other components of the proposed development (switch rooms, conversion units, cabling, fencing, lighting and other works)	The ExA asked about the number and location of the proposed switchrooms (approximately 18m x 5m x 3.5m). Mr Douglass explained that the number and precise location of the switchrooms would be determined at the detailed design stage. The ExA then asked whether the intention was for every Work No. 1 area to contain these units. Mr Douglass confirmed that each Work No. 1 area is intended to contain these units. Asked whether more thought could be given to the siting and design of the switchrooms, given their potential landscape and visual effects, Mr Yeates responded that this would be considered as part of the wider review of the DPPC, to see whether further parameters could be secured whilst retaining sufficient flexibility for detailed design.

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	Asked whether the switchrooms could be shown on the Indicative Masterplan, Mr Yeates explained that, whilst Work No. 1 (which includes the switchrooms) is shown on the Works Plans and the Indicative Masterplan, the detail currently available is not sufficient to identify the final locations of individual components. <i>See the Applicant's response to the Actions Points 23, submitted alongside this written summary at Deadline 1.</i> <u>Cable Route Corridors</u> The ExA asked why the cable route corridor runs from Subsite 7G towards Site 6. Mr Douglass explained that the cable route corridors transfer electricity between collector stations and substations and ultimately to the point of connection; this corridor carries electricity towards the substation proposed at Site 5. Mr Yeates agreed to provide a more detailed response, adding that Site 3 is also connected through a cable route corridor that ultimately feeds into Site 5. <i>See the Applicant's response to the Actions Points 24, submitted alongside this written summary at Deadline 1.</i> <u>Fencing</u> The ExA queried the appropriateness, in a rural part of Norfolk, of the steel palisade fencing of up to 3 metres proposed around the substations, BESS and associated infrastructure. Mr Douglass explained that palisade fencing is proposed primarily for security, whereas 2.4 metre perimeter deer fencing, with a lower visual impact, is generally proposed around the sites. Given the security requirements, there are limited alternatives to palisade fencing, although this could be discussed further with the local authorities. Mr Yeates referred to Requirement 10 of the Draft DCO [AS-032], under which details of fencing would be submitted to, and approved by, the relevant planning authority as part of the

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	detailed design process. Temporary fencing is also addressed in the Outline Construction Environmental Management Plan (Outline CEMP) [APP-196], secured by Requirement 13. In response to ecological concerns raised by Dr Berry relating to the impact of fencing on species movement and landscape connectivity, Mr Yeates referred to ES Chapter 8 [APP-044] and section 1.2.3 of the Outline Landscape and Ecology Management Plan (Outline LEMP) [APP-199], which addresses habitat connectivity. <i>See the Applicant's response to the Actions Points 25, submitted alongside this written summary at Deadline 1.</i> <u>Other Works (Work No. 7)</u> Mr Douglass explained that the operational and maintenance buildings (Work No. 7) would house equipment for the operation and maintenance of the Scheme and support periodic visits, and that the DPPC requires them to be sited outside higher-risk flood zones. Their parameters are set out within the DPPC and have been assessed on a reasonable worst-case basis. <u>Site 6, Acoustic Fencing and Lighting</u> Mr Douglass confirmed that no operational and maintenance buildings would be located in Site 6. In response to SNDC, which sought clarification on the proposed acoustic barriers, Mr Yeates referred to page 36 of the DPPC [APP-213], which secures acoustic barriers of up to 4 metres in height where required. Dr Berry (BEPS) asked whether Site 6, an ecological area, would be used as a construction compound only during construction and Mr Hook (Hempnall Parish Council and CPRE) sought confirmation of the lighting approach. <i>See the Applicant's response to the Actions Points 26 and 27, submitted alongside this written summary at Deadline 1.</i>

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h) Construction period, phasing, scheme lifetime, panel replacement and maintenance	The ExA asked whether an indicative or outline phasing plan could be provided. Mr Yeates explained that phasing will continue to be discussed with the relevant authorities, and referred to Figure 2.1 of the Outline Construction Traffic Management Plan (Outline CTMP) [APP-201], which sets out an indicative programme within the 24-month construction period assessed in the ES. Requirement 2 of the Draft DCO [AS-032] secures a written scheme setting out the construction phases and their timetable. In response to Dr Berry's query regarding whether the proposed phasing strategy would take account of other projects, Mr Yeates confirmed that this has been considered within the assessment, including cumulative and transport matters, and will be addressed through the discharge process, with controls ensuring that the effects of the Scheme, alone and in combination with other schemes, are suitably managed.
i) Construction compounds (Work No.8)	The ExA asked how the compound locations on ES Volume 2, Figure 4.2 - Indicative Temporary Construction Compound Locations [APP-060] relate to the construction compounds proposed. Mr Douglass explained that they correspond to the Works Plans, under Work No. 6 (Cable Route Corridor) and Work No. 8 (construction compounds within the Site). Asked how long the compounds would be required, Mr Douglass explained that, at present, they would be required for the duration of the construction period (assessed in the ES as two years) and agreed to consider linking this to the phasing strategy. <i>See the Applicant's response to the Actions Point 28, submitted alongside this written summary at Deadline 1.</i> Dr Berry asked about the future replacement of solar panels and which construction compounds would be used.

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	Adam Crompton, on behalf of the Applicant, explained that the replacement of modules would be staged rather than across all fields at once, so the compound areas may be needed again, but not all at the same time. Dr Berry asked how an area identified for ecology could also return to use as a construction compound and Ms Mullett asked how the construction compounds would be restored following construction. <i>See the Applicant's response to the Actions Point 29, submitted alongside this written summary at Deadline 1.</i> Ms Chandler asked about the construction compound proposed within Site 5. Tim Hapgood, on behalf of the Applicant, explained that materials for Site 5 would be brought to Site 4A, near the Hempnall roundabout, where vehicles would wait to be called forward before proceeding.
j) Green infrastructure / mitigation and enhancement areas (Work No.10)	The ExA noted that a number of mitigation and enhancement areas shown on the Indicative Masterplan as retained agricultural land which do not correspond with the Works Plans. Mr Yeates explained that the intention is to reflect the works sought and the areas within which they may take place, and the Applicant would review any inconsistency. The ExA referred to an area at Church Hill, Saxlingham Nethergate shown on the Indicative Masterplan as potential mitigation land but on Sheet 3 of the Works Plans as electrical and communication cabling. Mr Yeates explained that Work No. 10 facilitates habitat management areas, which may include fencing and signage, and that underground cabling is not necessarily incompatible with habitat management. <i>See the Applicant's response to the Actions Points 30 and 31, submitted alongside this written summary at Deadline 1.</i>

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	In response to concerns raised by Mr Jolliffe (South Norfolk Tree Warden Network), Mr Yeates responded that the assessment in ES Chapter 8 [APP-044] follows established guidance and identifies no likely significant adverse effects following mitigation. Mitigation is set out in the oLEMP which is secured under Requirement 7 and the final version will be submitted to the relevant planning authority for approval, following consultation with Natural England. ES Volume 1, Chapter 20 Summary of Residual Significant Effects [APP-056] reports a range of significant beneficial residual effects on Ecology.
k) Design Approach Document [APP-212]	The ExA considered that the Design Approach Document could be enhanced further. Mr Yeates welcomed that observation and invited further engagement on the document, to feed into potential updates to the DPPC and the outline management plans.
4. Applicant's approach on particular examination issues (note that this does not indicate that these are the only key issues: a) Aviation safety	Mr Yeates, on behalf of the Applicant, agreed to respond in full in writing. <i>See the Applicant's response to the Actions Points 32 and 33.</i> In response to Ms Bartaby (GAAC), who stated that aviation risks (including engine failure after take-off from Tibenham) had not been adequately addressed, Mr Yeates referred to the Applicant's Position Statement on Aviation [PDA-006] which draws together the Applicant's approach. Mr Yeates also noted that the Applicant is progressing a SoCG with the GAAC. Mr Yeates summarised that ES Volume 3, Appendix 18.1 Glint and Glare Assessment (Rev 2) [AS-025] to [AS-029] assesses specific environmental effects, whilst other aviation matters are considered in the High-Level Investigative Report [APP-222], prepared by Pager Power. That report applies precautionary assumptions as there is no prescribed methodology or known UK guidance on engine failure after take-off or glider launch failure. The report considers Civil Aviation Authority guidance and concludes that the Scheme would not significantly reduce the space available for emergency landings. On glint and glare, Mr Yeates also reiterated that paragraph 2.10.151 of NPS EN-3 states that there is no evidence that glint and glare impairs aircraft safety and that, unless significant

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	impairment can be demonstrated, the Secretary of State is unlikely to give more than limited weight to such claims. The ExA asked whether a standalone aviation assessment could be provided. Mr Yeates noted that the Position Statement already combines this material and so a separate and standalone assessment is not necessary, but confirmed that the point could be taken away for further consideration. <i>See the Applicant's response to the Actions Point 34.</i> The ExA asked whether the Applicant could engage with the GAAC. Mr Yeates confirmed that the Applicant would engage with the GAAC, including outside the examination process, and that a meeting had been arranged for October.
b) Cumulative effects	The ExA asked the Applicant to explain the content and purpose of the DCO Interrelationships Report to be submitted at Deadline 1. Mr Douglass explained that it is a type of document used on other DCO projects, including in Lincolnshire. It collates information on the proliferation of NSIP projects and highlights potential areas of significant effect by topic (for example, BMV land), but it is not a cumulative effects assessment. Mr Douglass confirmed that the report currently covers Norfolk and that its scope was to be discussed with NCC or SNDC. The ExA considered that the report should not necessarily stop at the county boundary, which is an administrative rather than an environmental boundary. Mr Douglass agreed to engage with the host authorities to consider extending the report beyond Norfolk, and to include other DCO projects that come forward during the Examination. <i>See the Applicant's response to the Actions Point 45, submitted alongside this written summary at Deadline 1.</i> Asked to explain which schemes are included in the cumulative assessment, Mr Yeates explained that a cumulative effects assessment can only consider third-party schemes with a

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	reasonable prospect of giving rise to additional effects. On Tasway Energy Park, Mr Buckley explained that the project is on indefinite hold, having not received a grid offer. The Applicant's position, discussed with SNDC and the Environment Agency for the SoCGs, is that it is not currently a cumulative scheme, having been withdrawn and falling below the Tier 3 threshold as it does not appear on the Planning Inspectorate's website. Mr Yeates added that Tasway is not sufficiently developed to be included, and any future Tasway application would need to undertake its own cumulative assessment, taking account of East Pye. Mr Yeates clarified that the Cumulative Effects Assessment applies a zone of influence around the Scheme in accordance with PINS guidance for carrying out cumulative effects assessments, and is not therefore limited by administrative boundaries. On the other hand, the Interrelationships Report (with precedent from Cottam, West Burton, Gate Burton and Tillbridge) shows more broadly how DCO projects may interact and be brought forward together. In response to specific representations from interested parties, Mr Yeates confirmed that EcoPower Solar Farm (approximately 10km south of Sub-Site 2A) and the BESS proposal approximately 900m north of Sub-Site 1B are both already included in ES Volume 3, Appendix 2.4 Cumulative Schemes [APP-116]. <i>See the Applicant's response to the Actions Point 46, submitted alongside this written summary at Deadline 1.</i>
c) Flood risk and drainage	Isaac Nunn (NCC) raised inconsistencies between the flood risk assessment and the ES, the absence of infiltration testing and the resulting uncertainty on off-site flood risk. Richard Fisher, on behalf of the Applicant, explained that the lead local flood authority had sought multiple infiltration testing points; the Applicant's strategy assesses a worst-case scenario that does not rely on infiltration, pending intrusive investigation. Mr Fisher added that strategic discharge locations are being identified as the drainage strategy is developed. The ExA asked whether infiltration testing would be undertaken during the Examination.

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	Mr Fisher explained that, given the remaining uncertainty on the final design, there is a commitment to undertake infiltration testing at the detailed design stage. The ExA asked whether the absence of infiltration testing could affect the assessment conclusions. Mr Fisher explained that infiltration appears highly unlikely given the underlying geology; the Applicant aims to mimic existing drainage, and assuming zero infiltration provides a contingency, which could be reassessed if infiltration proves feasible. Mr Nunn stated that there were no future meetings in the diary. Mr Yeates explained that engagement centres on the SoCG (shared with NCC on 28 August 2026), which the Applicant has followed up seeking meetings. All reasonable steps are being taken; the areas of disagreement concern substance, not a failure to engage. In any event, Mr Yeates added that paragraph 2(4) of Schedule 15 of the dDCO requires any final details submitted for approval to include a statement confirming whether they would give rise to any materially new or materially different environmental effects from those reported in the ES. The ExA noted an apparent impasse between the local authority and the applicant, to which Mr Yeates reassured that the point would be resolved offline and contact details shared.
d) Health and wellbeing	The ExA asked about the assessment methodology and how the Human Health Summary and Equality Impact Assessment operate together and asked why there was no standalone mental wellbeing assessment and how, within the current application, the Human Health Summary and the ES work together. Mr Buckley explained that the Human Health Summary (in ES Volume 1, Chapter 18 Other Environmental Matters [APP-054]) was prepared because human health had been scoped out in the scoping opinion; following feedback from the Planning Inspectorate, the Applicant was content to not consider human health as a standalone factor. Mr Buckley further explained that the Human Health Summary draws together the health-related effects identified throughout

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	the ES, whereas the Equality Impact Assessment considers those effects from an equality perspective; the documents overlap but approach the assessment from different viewpoints. The ExA asked how the assessment moved from potential adverse effects on some individuals to no significant adverse effects at population level. <i>See the Applicant's response to the Actions Points 41, submitted alongside this written summary at Deadline 1.</i> On perceived risk (for example BESS fire and horse riders on the highway), Mr Yeates responded that each technical topic has been assessed within the ES, with mitigation secured through the Outline Public Rights of Way and Permissive Paths Management Plan (Outline PROWPPMP) [APP-203] and other application documents, as summarised in ES Chapter 18 [APP-054]. Human health had not been scoped into the EIA as a separate topic. <i>See the Applicant's response to the Actions Point 42, submitted alongside this written summary at Deadline 1.</i> On vulnerable groups, Mr Yeates referred to HUM-003 in the Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012], which directs readers to the Equality Impact Assessment [APP-214]. This recognises that effects such as construction noise and vibration may be experienced differently by particular groups including neurodiverse individuals. Dr Berry raised concerns regarding perceptions of safety for women on fenced footpaths, and the safety of horse riders. On female safety, Mr Yeates explained that three new permissive paths are proposed and that the Applicant is engaging with NCC as Highway Authority through the SoCG. On bridleway safety, Mr Yeates explained that the ES chapters assess effects on the relevant receptors, including highway and PROW users, as addressed within ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177], and agreed to cross-refer to the expert equine submissions made in the Sunnica Energy Farm examination.

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	<i>See the Applicant's response to the Actions Point 43, submitted alongside this written summary at Deadline 1.</i> Carolyn Robinson asked what baseline evidence had informed the Human Health and Wellbeing assessment and whether local surveys had been undertaken. Mr Buckley explained that no bespoke local surveys were undertaken for the Human Health Summary, which draws on the ES chapters; because a standalone human health chapter was scoped out, the surveys undertaken were those appropriate to the matters scoped in. The ExA suggested that mental health should be scoped back in, given the level of concern raised. Mr Yeates welcomed specific written questions on what should be assessed further but noted that the scoping process has already established what the application must contain. Mental health was scoped out as a standalone chapter but has been built into each technical chapter, with signposting in ES Chapter 18. He added that concerns about the effects of compulsory acquisition on mental health had not been ignored, and that section 8 of the Statement of Reasons [APP-020] addresses human rights. Mr Yeates agreed to produce a document bringing together the relevant policy context, guidance, assessment and mitigation but denied the need for a standalone assessment as that undermines the purpose of the scoping process. <i>See the Applicant's response to the Actions Point 44, submitted alongside this written summary at Deadline 1.</i> Mr Hook noted that one of the proposed permissive paths, south from Saxlingham Green into Site 7, duplicates an existing public right of way. Mr Yeates explained that new permissive paths are intended to connect with the existing public rights of way network, as an isolated path would serve no practical purpose, and welcomed continued engagement through NCC. The ExA asked whether the proposal to introduce fencing alongside footpaths had been subject to a road safety audit.

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	Mr Yeates responded that, so far as he was aware, it had not. However, the DPPC secures 15-metre offsets from PRoW, giving a corridor of up to 30 metres where a PRoW runs between two fields, and Article 11 of the Draft DCO [AS-32] requires reasonable access for pedestrians to and from premises where a PRoW is temporarily closed. Ms Chandler noted that the proposed Site 5 diversion route would direct walkers onto the B1527, which has no footway. Mr Yeates responded that the Outline PRoWPPMP, which is not yet final and will be updated during the Examination, is the appropriate mechanism for securing such measures, and that the Applicant would continue to engage with NCC as Highway Authority. Asked how often the Applicant meets NCC on highways matters, Mr Hapgood explained that the last meeting took place in June or July, with written correspondence since (including on the draft SoCG), and that a further meeting would be arranged.
e) Transport and access	In response to NCC's concerns about access to Sites 7 to 10, Mr Hapgood, on behalf of the Applicant, stated that the Applicant is in dialogue with NCC on a draft SoCG and has sought to maximise the use of internal haul routes, as described in Table 5.1 of the Outline CTMP (Subsites 7A to 7F using CRC11 and CRC12, Subsites 7G to 7L and Subsites 8A and 8B). Mr Hapgood explained that the internal haul routes are for general construction traffic. Abnormal Indivisible Load (AIL) movements have been assessed on the road network, primarily the Strategic Road Network (SRN), and would not use the internal haul routes, save in relation to the BESS site, Subsite 1B and Site 5. The ExA asked whether any haul routes are proposed between Sites 7 to 10. Mr Hapgood confirmed that internal haul routes are proposed within Site 7 but not within Site 10. Dr Berry queried the permanence of the haul roads and how a haul road would cross the high-pressure gas main at Site 7. Mr Yeates explained that Part 5 of Schedule 14 of the Draft DCO [AS-32] contains bespoke protective provisions for National Gas to protect its apparatus and operations. Mr Hapgood

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	added that the internal haul routes would be removed once construction is complete, and the Applicant would obtain further information. <i>See the Applicant's response to the Actions Points 36, submitted alongside this written summary at Deadline 1.</i> Mr Hook commented on the environmental impact of the haul road proposals. Mr Hapgood responded that the Applicant had sought to internalise the routes as much as possible to limit impacts on the local road network and is in ongoing dialogue with NCC. Liz Williams raised concerns regarding access to Site 7 via The Krons in Hemphall, including whether ecological surveys had been undertaken. Mr Hapgood explained that the Applicant is in dialogue with NCC regarding access arrangements and that The Krons had been put forward by NCC as one of the options under consideration. Mr Yeates added that ES Chapter 8 [APP-044] includes various references to traffic-related ecological effects. <i>See the Applicant's response to the Actions Point 37, submitted alongside this written summary at Deadline 1.</i> Ms Mullett asked about permanent access from the B1134 to the substation and BESS site, including along Hundred Lane. Mr Hapgood explained that permanent access roads would be required for the substation and BESS at the locations identified within the application. Dr Berry asked why no botanical survey had been undertaken for areas of proposed road widening. Mr Yeates explained that this is addressed in the Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] (response to BEPS, 014). As local botanical records are not digitised, he agreed to engage with the botanists concerned.

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	<i>See the Applicant's response to the Actions Points 40, submitted alongside this written summary at Deadline 1.</i> Ms Read asked why Lodge Road, near Site 2, had been included as an access route. Mr Hapgood explained that access A06 on Lodge Road had been included as a prudent additional access for works associated with CRC2, the intended access being A02 on the B1134 Station Road, and that discussions with NCC were ongoing. Mr Yeates confirmed that the draft SoCG with NCC and all other draft SoCGs would be submitted at Deadline 1 and updated throughout the Examination. <i>See the Applicant's response to the Actions Point 38, submitted alongside this written summary at Deadline 1.</i> Mr Bloom (National Highways) explained that additional analysis is required to justify the conclusion of no impact at the A47/A140 junction, including cumulatively with the Norwich to Tilbury project. Mr Hapgood explained that an initial assessment of the A47/A140 junction has been undertaken, that the Applicant is engaging with the Norwich to Tilbury project team on cumulative impacts, and that a technical note responding to National Highways' concerns is at Appendix B4 of ES Volume 3, Appendix 11.1 Transport Assessment (TA)– Part 1 [APP-174]. In response to Ms Pye and Ms Reynolds, Mr Hapgood explained that the route through Saxlingham Nethergate is not proposed for general construction traffic but is a viable AIL route for the 132kV substation in Subsite 7F, assessed by Wynns (site visit and swept path analysis) in Part 3 of the TA [APP-176]. He referred to the AIL management measures in the Outline CTMP and agreed to obtain further information from Wynns. Mr Yeates added that street works under Article 10 must be restored to the street authority's reasonable satisfaction and that the general power cannot be exercised without its consent. <i>See the Applicant's response to the Actions Points 39, submitted alongside this written summary at Deadline 1.</i>

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5. Draft development consent order (DCO) The ExA will seek explanation and ask some initial questions on the content of the draft DCO [AS-032], including: a) Articles b) Schedule 1 - Authorised development c) Schedule 2 – Requirements (including 5 - Detailed design approval) d) Applicant's engagement with interested parties on Draft DCO [AS-32] matters, including articles, requirements and protective provisions	The ExA asked the Applicant for a high level summary of the DCO. Mr Yeates, on behalf of the Applicant, explained that the Draft DCO [AS-32] is the statutory instrument which controls how the Scheme will be constructed, operated and decommissioned. Unlike a planning permission, it also contains statutory powers, including compulsory acquisition powers, reflecting the “one-stop shop” approach under the Planning Act 2008. Within the Draft DCO [AS-32], the Applicant is the “undertaker” and the Scheme is the “authorised development”. The Draft DCO [AS-32] is more akin to an outline planning permission: it sets a consent envelope, and the detailed design will be approved post-consent by the relevant local planning authority (South Norfolk Council) pursuant to the Requirements in Schedule 2. Schedule 1 sets out the works and Schedule 2 sets out the requirements, with many final plans to be approved under those Requirements by using the process in Schedule 15. The Draft DCO [AS-32] will be updated during the Examination. It follows government guidance on Draft DCOs and Planning Inspectorate Advice Note 15 as well as drawing on solar DCO precedent including from Island Green Power's other schemes, including the made Orders for the West Burton Solar Project and Cottam Order Solar Project. Part 1 is preliminary (with definitions listed in Article 2); Part 2 contains the principal powers, with protective provisions for statutory undertakers in Schedule 14; Part 3 deals with streets (Articles 8 to 16, with further detail in Schedules 3 to 7); Part 4 contains supplemental powers; Part 5 contains powers of acquisition and temporary possession (Schedules 8 to 11); and Part 6 contains miscellaneous and general provisions. Each article and schedule is explained in the Explanatory Memorandum (Rev 2) [AS-034] which is the primary document for interested parties to consider to better understand the contents of the DCO. The ExA then asked about an update on the engagement with the parties in respect of the protective provisions.

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	Mr Yeates explained that bespoke protective provisions are included within the Draft DCO [AS-32] and those reflect negotiations with statutory undertakers on other Island Green Power schemes (including Green Hill Solar Farm and The Drovers). The latest position is captured in the Land and Rights Negotiations Tracker (Rev 2) [PDA-003], which will be updated throughout the Examination. Mr Yeates identified that there is an existing point of disagreement with National Gas, arising from negotiations on another project, although agreement is expected to be reached on all protective provisions by the close of the Examination. In response to two specific ExA queries: 1. Mr Yeates confirmed that the permitted preliminary works environmental management plan will be submitted as a final form plan, and that Requirement 13 has already been updated to require those works to be carried out in accordance with that plan. 2. Mr Yeates agreed to share the updated Requirement 5 wording with the councils in advance of its formal submission. Post hearing note: <i>This draft wording was shared with the councils in advance of Deadline 1.</i>
6. Other matters to include: a) Statements of Common Ground b) Outline management plans c) Commitments register d) National Planning Policy Framework 2026	The ExA asked about progress on the SoCGs. Mr Yeates confirmed that all recipients listed in the Rule 6 Letter have received an initial draft SoCG from the Applicant, which will be submitted at Deadline 1. Mr Yeates also explained that Commitments Register (Rev 2) [AS-038] is a signposting tool and is not a secured document. Instead, it identifies where the mitigation measures identified across the environmental statement are secured. In response to Dr Berry, who asked for all commitments to be in one place, Mr Yeates referred to the Guide to the Application (Rev 2) [AS-030] which records which documents are updated at each deadline, and that clean and tracked versions of updated outline management plans will be provided. The Applicant made no oral submissions in respect of the Outline Management Plans or the NPPF 2026.

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7. Actions and closing	The ExA confirmed that the action points would be published and asked those who spoke to provide written summaries by Deadline 1 (6 October 2026).

3 Applicant's Response to Action Points from ISH1

Table 3.1 Applicant's Response to Action Points from ISH1

Number	Party	Action	Response
1	The Applicant	Respond in writing to the query raised by Cllr Catchpole related to the site selection criteria adopted by the applicant.	Cllr Catchpole's comments made within the Issue Specific Hearing 1 (see Transcript of Issue Specific Hearing 1 (ISH1) – Part 1 [EV6-006] (00:56:31:07 - 00:57:32:26) refer to the Applicant's criteria for the National Grid Substation, which was summarised by Mr Yeates within the ISH (00:29:27:25 - 00:30:07:02) and which are set out within Sections 3.1 to 3.4 of the Site Selection Assessment [APP-215] and Section 5.5 of ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. As set out by the Applicant within the ISH, the National Grid Substation site selection assessment was shaped by four main considerations: • The capacity of the grid in accordance with NPS EN-3 Paragraph 2.1.14 (Section 3.2 of the Site Selection Assessment [APP-215]; • The Horlock and Holford Rules (Sections 3.3 and 3.4 of the Site Selection Assessment [APP-215]). • Accessibility for Abnormal Indivisible Loads (Section 3.4 of the Site Selection Assessment [APP-215]),

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			- Proximity to the 400kV Overhead Line (Section 3.4 of the Site Selection Assessment [APP-215]), and Cllr Catchpole states that the Scheme possibly passes the grid connection feasibility criteria, but fails on impacts to landscape and visual, ecological and biodiversity, agricultural land, heritage, highway and construction access, noise and residential amenity and potentially flood risk. The Applicant refers to the Horlock Rules, which are referred to within Paragraphs 2.9.18 and 2.9.19 of NPS EN-5. As set out within Paragraph 3.4.6 of the Site Selection Assessment [APP-215] in brief, Section 3 of the Horlock Rules state that applicants should: - Avoid internationally and nationally designated areas of highest amenity, cultural or scientific value, e.g. Ramsar sites, Site of Special Scientific Interest (SSSI), and National Landscapes; - Care should be taken in relation to all historic sites with statutory protection, e.g. Ancient Monuments, Battlefields and Listed Buildings; - Account should be taken of the Government Planning Policy Guidance and established codes of practice; - Account should be taken of any development plan policies relevant to the siting or design of substations; - Areas of local amenity value, important existing habitats and landscape features, such as ancient woodland, historic hedgerows, surface and ground water sources and nature

Number	Party	Action	Response
			conservation areas, should be protected as far as reasonably practicable; • The siting of substations, extensions and associated proposals should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum; and • The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum. The land use effects of the proposal should be considered when planning the siting of substations or extensions. These guidelines do not establish key pass / fail criteria, as implied by the representation, rather Paragraph 1 of Section 3 states that: '<i>. . . consideration must be given to environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum.</i>' The 'reasonably practicable minimum' is, as recognised within Sections 3.4 and 3.5 of the Site Selection Assessment [APP-215], in part defined by the key operational requirements for the National Grid Substation. The proximity to the overhead line was one such requirement, given the 400kV overhead line was established as having available capacity through discussions with NGET, and that proximity would reduce the length of any potential diversion of the existing overhead line into a new National Grid Substation, thereby minimising construction impacts and capital costs associated with new infrastructure, and reducing the

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			likelihood that diversions would be required through areas of high amenity and environmental value, in line with the Holford Rules (NPS EN-5 Paragraph 2.9.17). The identified location also needed to be accessible for Abnormal Indivisible Loads to deliver the transformers and other equipment associated with a substation from the Strategic Road Network. As set out within Section 3.5 of the Site Selection Assessment [APP-215], consideration of proximity to the Bramford to Norwich 400KV line and the A140, which were potentially appropriate for accommodating a new National Grid Substation, led to the identification of three initial options which were discounted based on accessibility constraints, the potential need to route through residential areas, and proximity to heritage assets, in line with the Horlock Rules. Two locations were identified south of Great Moulton directly beneath the 400kV overhead line, and accessible from the B1134 Station Road. Section 3.5 of the Site Selection Assessment [APP-215] considers both options against the Horlock Rules. Both options were presented within the EIA Scoping Report and were refined within the Preliminary Environmental Information Report. The option within Sub-Site 1B was considered to be preferable against a number of environmental factors, and the location to the south was discounted given that it overlapped with an application for a solar farm (ref. 2024/3817). In summary, the proposed location for the National Grid Substation is suitable for the following reasons, with regard to the Horlock Rules:

Number	Party	Action	Response
			• With respect of the avoidance of internationally and nationally designated areas and historic sites with statutory protection, the proposed National Grid Substation Site is not located within any statutory ecological, landscape, or heritage designations, and sits entirely within Flood Zone 1. The closest statutory ecological designations are the Aslacton Parish Land SSSI, 2.4km north-west, and Forngett Meadows SSSI, 2.82km north; • With respect of care in relation to historic sites, Sub-Site 1B does not overlap with any Conservation Areas, Registered Battlefields, or Registered Parks and Gardens. The closest Listed Buildings are the Grade II Listed Building 'Moulton Farmhouse', 85m south, and the Grade II* Listed 'Wacton Hall', 980m north-east. ES Volume 1 – Cultural Heritage concludes minor adverse and not significant effects to Moulton Farmhouse arising from views of the Project Substation within Sub-Site 1B during the construction, operational, and decommissioning phases. Wacton Hall was scoped out of the assessment. • With respect to relevant planning policies, the Scheme has been developed in accordance with NPS EN-1, EN-3 and EN-5, together with the South Norfolk Local Plan Development Management Policies Document. The National Grid Substation and the works in connection with the existing 400kV overhead line would be located outside the extent of the Rural River Valley policy area defined in South Norfolk Council's Development Management Policies Document (Policy DM4.5);

Number	Party	Action	Response
			• In terms of local amenity value, Sub-Site 1B is not located within close proximity to the Gissing Common County Wildlife Site or Tibbenham Airfield County Wildlife Sites, both over 1km to the west. As shown by ES Volume 1, Figure 8.5 – Priority Habitats [APP-090], there are limited priority habitats within (hedgerow) and surrounding Sub-Site 1B. • In respect of taking advantage of screening from landform and existing features, and keeping visual effects to a minimum, the National Grid Substation is located within the Great Moulton Plateau Farmland LCA, which is described as an area of elevated plateau above the 50m contour with the flatness of the plateau landform and lack of enclosure affording a strong sense of openness with expansive skies and distant views. Limited opportunities in citing the Horlock rules 'to take advantage of the screening provided by landform' exist in this landscape character area, however the design process identified opportunities for 'existing features' to provide landscape screening within Sub-Site 1B through the use of existing boundary vegetation in line with the Horlock rules. T • The Design Approach Document [APP-212] further sets out the refinement of the location of the National Grid Substation from the options presented at Statutory Consultation. At the statutory consultation stage, the National Grid Substation in Site 1B was initially orientated east–west. However, as part of the design evolution, the National Grid Substation was reorientated north–south to

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			enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRoW. While the landscape is generally open, existing boundary vegetation in the north western part of Sub-Site 1B would provide a level of screening. Mitigation is secured within the Design Principles, Parameters and Commitments [APP-213] and the Green Infrastructure Strategy [AS-005]. • In keeping the intrusion into surrounding areas, and visual, noise, and other environmental effects to a reasonably practical minimum, the proximity of the proposed National Grid Substation to the 400kV overhead line means that grid connection infrastructure would not be routed through any residential settlement. The proposed National Grid Substation can be suitably accessed by AILs from the SRN. • Noise effects on nearby sensitive receptors from operational plant at the National Grid Substation, are assessed in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], which concludes that with the implementation of mitigation measures, significant adverse noise and vibration effects at sensitive receptors will be avoided.; • Site 1 is all ALC Grade 2 quality. Given the requirements for the substation to be located close to the overhead line, avoidance of BMV land is therefore not possible.

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2	The Applicant	Point to any information in the application that indicates that site selection was conducted by undertaking environmental screening first, followed by landowner agreement	The Applicant notes that there is considerable overlap between this ISH Action Point and Q1.3.2 of the Examining Authority's Written Questions 1 (ExQ1) [PD-006], which asks the Applicant <i>'to explain the relative influence of environmental assessment, engineering requirements, grid connection considerations, landowner willingness, and land availability in the identification and selection of the Order limits. In particular, the applicant should clarify whether the preferred site was selected principally because it represented the environmentally preferable option or because it offered operational, engineering and grid connection advantages, and whether environmental suitability or land availability was ultimately the determining factor in defining the proposed development.'</i> To avoid duplication, the Applicant refers to the response provided on this in relation to Q1.3.2 in the Applicants Response to EXA's Initial Written Questions [EN0110014/EXAM/9.2].
3	The Applicant	Provide a clarification note to explain how landowner agreement fed into the site selection process	To avoid duplication, the Applicant refers to the response provided on the influence of landowner agreement in the site selection process in relation to Q1.3.2 in the Applicants Response to EXA's Initial Written Questions [EN0110014/EXAM/9.2] .
4	The Applicant	Provide the desktop planning review document that informed the early site selection process	The Applicant has provided the 'Desktop Planning Assessment' Report at Appendix A within this response document.
5	The Applicant	Provide a response to Block East Pye Solar's (BEPS) question	Site Selection Assessment [APP-215] paragraph 3.2.4 describes how the Applicant commenced their search for solar

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		concerning the date when landowner engagement began	sites concurrently to initially considering the Norwich Main substation as the point of connection in 2022.
6	The Applicant	Respond in writing to the question raised by BEPS in respect of land already within a countryside stewardship scheme	As of March 2026, the Applicant was aware of all the Countryside Stewardship (CS) Schemes across the Order Limits not including the CRC. All the CS schemes the Applicant has identified and been made aware of are set to expire ahead of the planned construction date. It is relevant to mention that in the event the terms of a CS scheme have been breached the Rural Payment Authority, who administers the schemes, will liaise with the landowner to recover payments relative to the scale of the breach. The Applicant does not anticipate this to happen for the above reasons. In any case, the CS scheme aims to enhance the natural environment by supporting a variety of activities, including restoring wildlife habitats, creating woodlands, and managing flood risks. Surveys of habitats and plants, sufficient to inform the ES, have been undertaken are reported in ES Volume 3, Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey [APP-152], which has been used to inform ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] which includes assessment of the Scheme on important ecological features including habitats and plants. Any land within a CS scheme was surveyed and so the baseline has been captured and reflect the schemes environmental benefits. The Scheme has been designed to include landscape and ecological enhancement with the landscaping shown in the Green Infrastructure Strategy [AS-

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			005] and the long-term habitat management and monitoring measures described in the Outline LEMP [APP-199] . As set out in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] , the Scheme is not anticipated to result in any significant adverse effects, with significant beneficial effects assessed for native hedgerows and treelines, ponds, rivers, lowland deciduous woodland, scrub, other neutral grassland, ditches, common and widespread habitats of low sensitivity and/or ecological interest, skylark, bats, badger, water vole, and otter.
7	The Applicant	Provide a response to the question raised by BEPS in respect of need for the project and the Clean Power 2030 Action Plan.	The Applicant refers to the response it gave in the Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] to the first bullet point of Representation ID BEPSG-01, which sets out the need for the project including in the context of the Clean Power 2030 Action Plan.
8	The Applicant	Provide a response to BEPS' question regarding the options taken forward in the Preliminary Environmental Information Report (PEIR)	As set out within Section 3.5 of the Site Selection Assessment [APP-215] and ES Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] , the Applicant considered two options for the location for the National Grid Substation within the EIA Scoping Report [APP-113] , a location to the south of Sub-Site 1A, and an area within part of Sub-Site 1B (see paragraph 3.6.7 of the Scoping Report). These options were refined and presented within the Preliminary Environmental Information Report (PEIR) at the statutory consultation stage. A 132kV Project Substation was proposed within Sub-Site 1B.

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			Following statutory consultation, the Applicant amended the proposed grid connection by relocating the National Grid Substation from the previously proposed Site 1 location south of Sub-Site 1A, to Site 1B and replacing the proposed 132kV substation with a 400kV substation to the east of the original location. The revised arrangement removes the need for an additional transformer at the BESS substation, reduces associated overhead line infrastructure, and is stated by the Applicant to provide operational and environmental benefits. This information was presented during the targeted consultation process from October to November 2025. ES Volume 1, Chapter 1 – Introduction [APP-037] provides a short summary of the targeted consultation process. As stated within Chapter 1, the Consultation Report [APP-024] has been produced which provides a more detailed summary of the targeted consultation process. As part of this consultation, the Applicant published on its website a Targeted Consultation Information Change Note (Section 2 of Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]) to provide details of the consultation, present each specific change to the development boundary. The additional areas and associated activities including their nature, extent, and duration had been reviewed as part of the environmental assessment and have been fully assessed within the Environmental Statement (as set out in ES Chapter 4 – The Scheme [APP-040]). The additional areas did not change the likely significant effects of the environmental impact assessment that were set out in the PEIR (the findings from which the Applicant sought views on for the Phase Two

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			(statutory) consultation), which was set out in the Targeted Information Change Note. PINS Advice Note 7 recognises that a PEIR comprises preliminary environmental information prepared whilst the EIA remains ongoing. Paragraph 8.4 states that '<i>There is no prescribed format as to what PEI should comprise and it is not expected to replicate or be a draft of the ES</i>'. The PEIR therefore formed part of an iterative EIA process in which survey work, assessment and design development could continue prior to submission of the ES. It is standard practice for an application of this nature that the detail and extent of surveys progresses as the EIA evolves from Scoping, through PEIR, to the final ES. On this basis, the Applicant considers it reasonable that not all survey information was available at the time of the targeted consultation and that sufficient information was presented at PEIR and targeted consultation for the consultation bodies to develop an informed view of the likely significant effects of the Scheme.
9	The Applicant	Provide plans to clearly show the distance between elements of the proposed development and properties within close proximity. Include the measurements on the Plans.	An additional plan has been provided and submitted at Deadline 1 Indicative Masterplan with Buffers from Proposed Infrastructure [EN0110014/EXAM/9.25] .
10	The Applicant	Provide further explanation of the design parameters for the substation,	The Applicant has updated ES Volume 3, Appendix 4.1 – Illustrative Technical Information [APP-117] to include an

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		including its capacity to accommodate other schemes	illustrative layout of the National Grid substation and submitted this at Deadline 1. The Design Principles, Parameters and Commitments document [APP-213] sets out the maximum dimensions of various aspects of the National Grid Substation which were defined through discussion with National Grid. Work No. 4 in the Draft DCO [AS-032] provides for four feeder bays within the National Grid substation, which could allow for other projects to connect into the overhead line.
11	The Applicant	Provide a written response on the certainty of deliverability of the National Grid substation as the point of connection. Include detail on the timings for both the solar farm and the substation, and confirm how this would be secured.	<u>Certainty of deliverability – DCO powers</u> As explained in the Grid Connection Statement [APP-207], the Applicant has signed a connection agreement with National Grid. The delivery of the connection under that agreement contractually obliges the Applicant to provide the land and gain consent for the proposed new National Grid Substation. In that context, the application has included all of the necessary powers for the delivery of the new substation, giving absolute certainty on the ability of the DCO to facilitate the delivery of the point of connection. For example: • Work No. 4 in Schedule 1 of the Draft DCO [AS-32] includes the necessary powers for the delivery of a new national grid substation; • Article 36(2) (benefit of the Order) confirms that the benefit of Work No. 4 (and Work No. 5) are for the benefit of the undertaker and National Grid, to ensure that the works for the new national grid substation (and connection works to

Number	Party	Action	Response
			the OHL) may be carried out by either the Applicant or National Grid; and Compulsory Acquisition powers over the relevant land are sought as set out on the Land Plans [APP-106] as a fallback to any voluntary agreement(s) entered for that land. Option Agreements have been entered into with the relevant landowners for the elements of the Sites that comprise the Solar PV Arrays, the BESS, the Project Substations and the National Grid Substation. The connection of East Pye Solar Farm is not contingent on NGET obtaining a separate planning permission because the Applicant has made provision for connection via associated development included in the Application. This secures the necessary certainty of deliverability within the scope of powers being sought. The Applicant may take this approach because the new substation is capable of being "associated development" under the PA 2008, as explained in the Explanatory Memorandum [AS-034]. <u>Timing</u> Section 2.7 of the Statement of Need [APP-206] explains that the connection for the solar component of the Scheme has secured a Gate 2 Phase 2 prioritisation (i.e. between 2031 and 2035 inclusive). Section 4.4 of ES Volume 1, Chapter 4 - The Scheme [APP-040] explains that, subject to being granted development consent and following a final investment decision, the construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. On this basis, it is expected that the

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			Scheme could be completed by the end of 2030 and energised in 2031. If the Grid Connection Date was amended to be later within the Gate 2 window, the start of construction may be delayed so as to dovetail with the Grid Connection Date. Section 3.4 of the Grid Connection Statement [APP-207] explains that the new National Grid substation will be a substation constructed and owned by National Grid Electricity Transmission (NGET). The Applicant expects that, subject to being granted development consent, NGET would seek to confirm the location of the new National Grid substation at which the Scheme is contracted to connect (although the Applicant knows of no reasons why the proposed location would be changed); and NGET construction works would be scheduled to dovetail with the confirmed Grid Connection Date. The Applicant does not consider that it would be commercially rational for the Scheme to be constructed and then sit idle while the Grid Connection is delivered. There is therefore a natural check-and-balance within the Scheme, in that construction of both the National Grid substation and the other Works would commence to ensure the efficient construction and operation of the Scheme as a whole. This is also suitably controlled primarily through Requirements 2 and 5, as secured in Schedule 2 of the Draft DCO [AS-32]. Pursuant to Requirement 2, no part of the authorised development may commence until a written scheme setting out the phase or phases of construction of the authorised development has been

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			submitted to the relevant planning authority. This must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing areas, including the National Grid substation works if being delivered under the DCO powers. Further, the Applicant notes paragraph 4.14 of the Secretary of State's decision letter for the made Springwell Solar Farm DCO (EN010149) in which he decided to allow all the works proposed by Springwell Energy Farm Limited to be carried out before the planning permission for the National Grid substation had been granted. The Applicant therefore considers that the DCO as drafted already appropriately secures the construction timelines for the Scheme and includes certainty of deliverability over and above that which is precededented (given that the Draft DCO [AS-32] being sought includes its own powers to deliver the new National Grid substation and therefore the consent is self-sufficient).
12	The Applicant	Provide clarification on the capacity and use of the National Grid substation for future projects and confirm whether there are further cumulative or downstream effects that need to be considered as a result	Section 2.7 of the Statement of Need [APP-206] explains that there is currently an insufficient number of existing transmission system or distribution network substations that are suitably located with available capacity to connect the new solar, onshore wind and offshore wind assets required to meet the government's low carbon aims. Further, that the efficient utilisation of existing networks can defer or negate the need for expensive new infrastructure, which takes time to deliver.

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			The Applicant has demonstrated that its approach to site selection for the National Grid substation, as set out in the Site Selection Assessment [APP-214] has resulted in a location which is suitable for a substation which meets NGET's technical parameters. The Applicant confirms that the electrical infrastructure required to connect the Scheme would fit within the proposed substation area. Seeking and securing consent for infrastructure which would be able to connect other schemes is a rational approach within the context of there being a great need for new schemes to come forward all the way to 2050, and there being a current shortage of suitable connections for them. This approach is supported by the 'Planning Act 2008: Guidance on preparing an application: Part 3 - Contents of a draft Development Consent Order' (3 July 2026). This includes a principle that associated development should be proportionate to the nature and scale of the principal development. However, <i>"this principle should not be read as excluding any associated infrastructure development that is on a larger scale than is necessary to serve the principal development if that associated infrastructure provides capacity that is likely to be required for another proposed major infrastructure project"</i>. The Applicant refers the EXA to the response at Question 10 above. The Applicant is not currently aware of any future projects which are confirmed as coming forwards in the area, and notes that it would be for NGET to confirm the capacity and use of the National Grid substation for future projects.

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			The applicant has assessed all cumulative schemes in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The EIA Regulations require the assessment to take into account 'the cumulation of effects with other existing and/or approved projects...' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's Advice on Cumulative Effects Assessment. Should future projects connect into the National Grid Substation, the cumulative effects of the East Pye Solar and the future projects would need to be assessed in full as a part of the future DCO applications in accordance with the aforementioned guidance.
13	The Applicant	Provide an indicative/ illustrative drawing for the proposed National Grid substation	An illustrative drawing has been provided as an update to ES Volume 3, Appendix 4.1 - Indicative Illustrative Information [EN0110014/EXAM/6.3.4.1] , submitted at Deadline 1.
14	The Applicant	Rectify table 4.1 of Environmental Statement (ES) chapter 4 [APP-040] to ensure the maximum height of the busbars for the National Grid substation is included within the correct scheme component	Table 4.1 of ES Volume 1, Chapter 4 – The Scheme [EN0110014/EXAM/6.1.4] has been amended to clarify that the maximum height for the National Grid Substation is 15m to the top of the busbars.
15	The Applicant	Provide further indicative detail regarding the existing pylons,	The Applicant confirms that Site 1 contains five existing 53m pylons associated with the existing 400kV dual circuit overhead

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		including confirmation of height and what is proposed in respect of these	line (Norwich Main – Bramford), which runs south-west to north-east through the Site. The Scheme proposes to divert the existing dual circuit 400kV overhead line into a newly constructed double busbar National Grid Substation (Work No. 5), with the works delivered in carefully planned stages to maintain safety, minimise disruption and ensure continuity of supply throughout. Up to four new pylons would be installed (of which three would be associated with the repositioning of existing pylons and up to one new pylon), with a maximum height of up to 61m above ground level, alongside up to one temporary pylon to facilitate the transition. Up to three existing pylons would then be removed following the installation of the repositioned new pylons, allowing for the decommissioning and removal of the existing section of overhead line, thereby reducing long term visual and environmental impacts on the local area. Further detail is provided in the ES Volume 1, Chapter 4 – The Scheme [APP-040] and the Design Principles, Parameters and Commitments [APP-213] .
16	The Applicant	Provide an illustrative drawing of the proposed gas insulated substation (GIS)	ES Volume 1, Chapter 4 – The Scheme [APP-040] will be updated at a later deadline to includes illustrative images of AIS and GIS substations to aid reader understanding.
17	The Applicant, Norfolk County Council, South Norfolk	Engage further with the local authorities on the design principles for the proposed development, in particular the design principles for the substations, and the legal	The Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on the design principles for the Scheme. A meeting was held jointly between the Applicant and both local authorities on 28 September 2026 to discuss the level of detail and certainty provided by the Design Principles, Parameters and Commitments [APP-213] document, including

Number	Party	Action	Response
	District Council	controls for the National Grid substation	the design and finishes of infrastructure, the interaction between the National Grid substation and landscape planting, fencing and other mitigation. The Councils agreed to provide some precedent examples of design principles used on other schemes for the Applicant to consider. The legal controls for detailed design, including those applicable to the National Grid substation, are also being considered through ongoing discussions on Requirement 5 of the Draft DCO [AS-032], with further engagement between the parties' legal advisers proposed. The Applicant's updated wording submitted at Deadline 1 was shared with the councils in advance of Deadline 1. Ongoing dialogue will take place between the parties with further meetings scheduled in the next 2 weeks following Deadline 1. Updates relating to design matters will be set out in the Design Principles, Parameters and Commitments [APP-213] document at a later deadline as engagement continues. Discussions are recorded in the SoCG between the relevant parties.
18	The Applicant	Provide further clarification to set out how the differences between air insulated substation (AIS) and GIS have been considered in the application, including where it has been considered for the reasonable worse-case assessment in the ES	The DCO seeks consent with flexibility for either air insulated switchgear (AIS) or gas insulated switchgear (GIS) substation options for the 400kV Project Substations. AIS uses air as an insulation medium, with electrical components exposed to the air. GIS uses gas as the insulation medium, with electrical components within a fully enclosed large metal structure. AIS typically requires a greater footprint to maintain suitable component spacing. ES Volume 1, Chapter 4 – The Scheme [APP-040] will be updated at a later deadline to includes

Number	Party	Action	Response
			illustrative images of AIS and GIS substations to aid reader understanding. For the purposes of the ES and to ensure that the DCO considers the environmental impacts in full a worst-case scenario has been assessed using the maximum parameters set out in ES Volume 1, Chapter 4 – The Scheme [APP-040] and secured through the Design Principles, Parameters, and Commitments [APP-213]. There will be up to three 400kV Project Substations located within the Order Limits within the BESS Site, Sub-Site 5A, and Sub-Site 1B. The maximum parameters assessed for the 400kV Project Substations, as detailed in Table 4.3 of the Design Principles, Parameters, and Commitments [APP-213], have sufficient flexibility to accommodate either AIS or GIS. The maximum parameters of the 400kV Project Substations have been used within the relevant assessments within in the ES such as ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], ES Volume 1, Chapter 7 – Landscape & Visual [APP-043], ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], and ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] with regards to land take and scale, as such there is no difference in assessed effects between AIS and GIS as the maximum worst-case parameter has been assessed. ES Volume 1, Chapter 6 – Climate Change [APP-042] considers the use of Sulphur Hexafluoride within GIS (Sulphur Hexafluoride is not used within AIS). Switchgear equipment is now supplied to minimise leakages. Additionally, through regular checks of the equipment for gas leaks, it can be expected the leaks to be de minimis. See the Applicant's response to the Examining

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			Authority's First Written Questions Q1.5.3 regarding use of Sulphur Hexafluoride. ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] assesses noise from project substations (allowing for both GIS and AIS systems). The assessment focuses on continuous noise generated by the substations. Transformers/reactors and cooling fans are the dominant sources within substations, and continuous noise from switchgear is unlikely to be discernible. The modelled source sound levels presented in ES Volume 2, Appendix 12.2 – Noise Modelling and Calculations [APP-179] therefore take noise from either AIS or GIS into account. Switchgear is likely to be activated very infrequently, typically only a few times a year for outages and maintenance, and in emergencies to protect the substation and electricity network infrastructure from lightning strikes or faults. Noise from switchgear switching is impulsive in character (i.e., of very short duration). No significant effects on noise sensitive receptors are anticipated due to the low noise level and infrequency of operation.
19	The Applicant	Clarify where in the application documents the applicant's consideration of alternatives to the substation proposed at site 5 can be found	As set out within the Grid Connection Statement [APP-207] Paragraph 3.1.3, the location of the 400 kV Project Substation in Sub-Site 5A is directly informed by the technical configuration of the Grid Connection Infrastructure. There is a requirement to accommodate circuits from Sites 3, 4, 5, 7, 8, 9 and 10 to connect into the Site 5 400kV Substation. Circuits will then run from Site 5 down to the 400kV Project Substation and then, via a 400kV cable, into the new National Grid Substation where the Scheme will connect to the NETS.

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			ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], Table 5.1: Summary of Key Design Changes through the Evolution of the Scheme, sets out that, at Stage 1, consideration was given to a 400kV Project Substation in Site 5, with initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context. At Stage 2, the location for the 400kV Project Substation was identified in Sub-Site 5A, with consideration of the High-Pressure Gas Main within the site, potential archaeological remains as indicated by the HER data and the geophysical survey, and consideration of landscape and visual impact. As set out in Paragraph 5.1.10 of the Design Approach Document [APP-212], the siting of the Project Substation in Sub-Site 5A has remained largely unchanged. As set out in paragraph 3.1.3 of the Grid Connection Statement [APP-207], the location of the 400 kV Project Substation within Sub-Site 5A is directly informed by the technical configuration of the Grid Connection Infrastructure. Circuits from Sites 3, 4, 5, 7, 8, 9 and 10 must connect to the Site 5 400 kV Project Substation. From there, the circuits will connect by 400 kV cable to the new National Grid Substation, where the Scheme will connect to the NETS. The central location of the 400kV Project Substation within Site 5 therefore provides an electrically efficient design. From a landscape and visual perspective, the Project Substation has been sensitively sited centrally within Site 5 maximising the screening benefits of existing vegetation and maximising the setbacks from a number of receptors including local PRoW, residential properties and heritage receptors. Collectively these

Number	Party	Action	Response
			measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A Green Infrastructure Strategy [AS-005] has been developed which includes a combination of new hedgerow with trees, tree planting and hedgerow improvements to respond to existing characteristic features and aid visual screening of the Scheme. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is in the Outline LEMP [APP-199] secured by Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The location within Sub-Site 5A was considered to benefit from good accessibility for construction traffic and AILs from the A140 via the B1527. The Project Substation in Sub-Site 5A is located on subgrade 3b quality land and therefore does not comprise BMV, as set out at Paragraph 15.8.44 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The 400 kV Project Substations are subject to design parameters and commitments secured through the Design Principles, Parameters and Commitments [APP-213], including minimum offset distances from watercourses, badger setts, hedgerows, trees, Ancient Woodland, ponds, SSSIs, County Wildlife Sites, PRoW and residential curtilages, together with maximum compound areas and a maximum height of 13m to the top of the busbars. The Design Principles, Parameters and

Number	Party	Action	Response
			Commitments [APP-213] further states that, whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. The Applicant therefore considers that the site selection and design evolution of the 400 kV Project Substations, undertaken as part of the wider environmentally led design process in accordance with NPS EN-1, NPS EN-3 and NPS EN-5, provides a proportionate and criteria-led justification for the chosen location of the 400kV Project Substation within Site 5, which enables an electrically efficient design, and benefits from existing screening and accessibility from the SRN.
20	The Applicant	Confirm the reference point datum used for the vertical height measurements stated in the Design Principles, Parameters and Commitments document [APP-213] for the battery energy storage system (BESS) and other infrastructure. Provide further clarification in an update to the document [APP-213] and any other relevant documents	Vertical height measurements are taken from Above Ordnance Datum (AOD). The Design Principles, Parameters and Commitments document [APP-213] has been updated to confirm the same.
21	The Applicant	Provide a technical note on overplanting. Include details of the panel rating and confirm how this	<u>Overplanting</u> Section 6.6 of the Statement of Need [APP-206] provides an overview of overplanting, which is not repeated here, save for the

Number	Party	Action	Response
		has been assessed in the ES. Provide a comparison of panel ratings proposed for East Pye Solar with other approved solar consents and proposed development consent projects. Provide further clarity on the calculations. Provide figures in hectares per megawatt of output; the Statement of Need [APP-206] refers only to acres	conclusion that an overplanting ratio up to between 1.3 and 1.6 is rational for this scheme. The Applicant has not provided a nameplate capacity (expressed in MWp) in its Application Documents so far but to confirm, the indicative layouts accommodate approximately 600MWp (tracker) or 650MWp (fixed) panels. These equate to overplanting ratios of 1.2 and 1.3 respectively. Paragraph 6.9.95 of ES Volume 1, Chapter 6 - Climate Change [APP-042] explains that: <i>“Renewable energy generation from the Scheme during the first year of operation is estimated to be around 667,760 MWh/year on the assumption of using a tracker system”</i> – which is consistent with the MWp stated above. The indicative design for the Scheme is based on 660 Watt panels. These are representative of panels which are currently commonly available on the market and therefore contribute to a conservative assessment of installed capacity and project benefits. <u>Comparison of panel ratings</u> The Applicant notes that neither panel capacity nor total scheme DC installed capacity are controlled DCO parameters. This is because developers will seek to include the most effective technology available at the final procurement and construction stages (within the scope of the other parameters secured within the application) and therefore will be dependent on ongoing technology advances through the project development period. For this reason, not all DCO applications specify the rating of panels

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			used at the detailed design stage. However, indicative single panel rating ranges were included in Application documents for the following made and proposed schemes: • Cleve Hill (made) 250 – 400 Watts/panel • Longfield (made) 390 – 800 Watts/panel • Sunnica (made) 250 – 400 Watts/panel • Tillbridge (made) 400 – 1000 Watts/panel • Fosse Green (proposed) 670 Watts/panel The use of 660 Watt panels for East Pye therefore aligns with the above precedent, particularly the more recent schemes which are more representative of the latest available technology. <u>Implications for the Scheme</u> By way of illustration, if the indicative layout designs instead used panels which have the same physical dimensions as the indicative 660W panels but have a higher panel power rating (e.g. 800 Watts/panel), overplanting would increase to between 1.5 and 1.6. This would still be within the rational range provided in the Statement of Need. <u>Hectares per MW of output</u> Paragraph 2.10.9 of NPS EN-3 (2025) provides guidance that, along with associated infrastructure, a solar farm currently requires between 1.6 and 2.25 hectares (4-5.6 acres) for each MW of output. The Applicant notes that this is higher (i.e. less

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			land-efficient) than the range of 2-4 acres (0.8 - 1.6 hectares) for each MW of output in NPS EN-3 (2023). NPS EN-1 also states that the ratio <i>"will vary significantly depending on the site, with some being larger and some being smaller"</i>. The Applicant has assessed the Scheme using the same method as was used for the made Mallard Pass DCO (EN010127). The method uses the MWp (installed peak) as a measure of capacity because it reflects more closely the renewable generation benefits delivered by the site (as opposed to the grid connection). In relation to land area, the Examining Authorities Recommendation Report for Mallard Pass Solar Farm explains at paragraph 3.2.101 that <i>"fields earmarked for ... mitigation and enhancement should not necessarily be considered as a negative. Indeed, this area supports the biodiversity net gain objectives"</i>, and paragraph follows with the ExA's agreement with the Applicant's <i>"assumption ... that the range is intended to include 'associated infrastructure' as stated but not mitigation and enhancement areas."</i> The Secretary of State acknowledged the Applicant's methodology for calculating acres / MWp and noted at 4.18 of his Decision Letter that <i>"the Proposed Development is of substantial scale but not significantly larger in terms of acres per megawatt peak when compared with other solar NSIPs"</i>. This method has been used in the following made DCOs: • Mallard Pass Solar Farm (EN010127)

Number	Party	Action	Response
			• East Yorkshire Solar Farm (EN010143) – See Section 6.1 of REP3-038 • Springwell Solar Farm (EN010149) • Beacon Fen Energy Park (EN010151), see Pages 25-28 of REP1-030 Further: • Paragraph 3.1.18 of a Technical Guide ([REP3-036]) submitted during Fosse Green Energy (EN010154) explains that DC capacity has been used to inform the assessment of that project, which is in line with the methodology used and agreed by the ExA and SoS in previous solar NSIPs. • Pages 19 to 20 of Written Summary of Applicant's Oral Submissions (Issue Specific Hearing 1) ([REP1-004]) submitted during the Light Valley Solar (EN0110012) examination confirms the use of the same methodology. <u>MWp</u> The indicative layouts accommodate approximately 600MWp (tracker) or 650MWp (fixed) panels <u>Area</u> The Planning Statement [APP-209] Para 1.1.4 explains that the total area of the Order limits is 1,212.3 hectares (2,995.7 acres).

Number	Party	Action	Response
			The area of the solar sites (1-10) and the BESS site is 1,053.8 hectares. Within those sites, the area of land excluding all land which, post-construction, is mitigation or enhancement land, is 631.9 hectares (1,561.5 acres). For the avoidance of doubt, this includes Work No 1, 2 & 3 and adjusts appropriately for any Work area overlaps. Approximately 14% of the order limits is for CRCs between the Solar Sites and the PoC. Post construction, this land will be not be used for solar panels and its associated infrastructure and has therefore been excluded from the calculation (following installation of the cable route, the area would be reinstated). Therefore, delivering a scheme of indicative 600 – 650 MWp would utilise land at 2.4 - 2.6 acres, or 1.0 - 1.1 hectares for each MW of output, i.e. utilises land more efficiently than the EN-3 (2025) range and utilises land within the NPS EN-3 (2023) range. Calculations (acres / MW) • 1561.5 acres / 600 MWp = 2.60 acres/MW • 1561.5 acres / 650 MWp = 2.40 acres/MW Therefore: • 2.60 acres/MW / 2.471 acres / hectare = 1.052 hectares/MW (rounded to 1.1 hectares/MW above) • 2.40 acres/MW / 2.471 acres / hectare = 0.971 hectares/MW (rounded to 1.0 hectares/MW above)

Number	Party	Action	Response																																																																																											
			The Applicant has provided the following table of made DCOs where the public record enables a calculation of acres used for each MW of output, based on the methodology described above. <table><tr><th>PINS Ref</th><th>Name</th><th>MWp</th><th>Solar Area (hectares)</th><th>Hectares / MWp</th><th>Solar (Acres)</th><th>Acres / MWp</th></tr><tr><td>EN010085</td><td>Cleve Hill Solar Park</td><td>373</td><td>176</td><td>0.5</td><td>436</td><td>1.2</td></tr><tr><td>EN010101</td><td>Little Crow Solar Park</td><td>175</td><td>153</td><td>0.9</td><td>379</td><td>2.2</td></tr><tr><td>EN010106</td><td>Sunnica Energy Farm</td><td>627</td><td>621</td><td>1.0</td><td>1535</td><td>2.4</td></tr><tr><td>EN010118</td><td>Longfield Solar Farm</td><td>371</td><td>275</td><td>0.7</td><td>680</td><td>1.8</td></tr><tr><td>EN010123</td><td>Heckington Fen Solar Park</td><td>500</td><td>417</td><td>0.8</td><td>1031</td><td>2.1</td></tr><tr><td>EN010127</td><td>Mallard Pass Solar Project</td><td>350</td><td>420</td><td>1.2</td><td>1038</td><td>3.0</td></tr><tr><td>EN010131</td><td>Gate Burton Energy Park</td><td>531</td><td>474</td><td>0.9</td><td>1171</td><td>2.2</td></tr><tr><td>EN010132</td><td>West Burton Solar Project</td><td>661</td><td>734</td><td>1.1</td><td>1814</td><td>2.7</td></tr><tr><td>EN010133</td><td>Cottam Solar Project</td><td>871</td><td>879</td><td>1.0</td><td>2173</td><td>2.5</td></tr><tr><td>EN010149</td><td>Springwell Solar Farm</td><td>800</td><td>656</td><td>0.8</td><td>1621</td><td>2.0</td></tr><tr><td>EN010159</td><td>One Earth Solar Farm</td><td>1048</td><td>945</td><td>0.9</td><td>2335</td><td>2.3</td></tr><tr><td>EN010151</td><td>Beacon Fen Energy Park</td><td>400</td><td>479</td><td>1.2</td><td>1184</td><td>3.0</td></tr></table> This data shows that the Scheme’s land utilisation is consistent with that of other made DCOs. <u>Environmental Statement</u> As noted in paragraph 4.3.6 of ES Volume 1, Chapter 4 – The Scheme [APP-040], the Applicant does not propose a limit on the generating capacity of the Scheme in the DCO Application as the environmental effects associated with the Scheme are determined by the relevant design parameters and not capacity. The extent of panels assessed in the ES aligns with Work No.1 as defined on the Works Plans [AS-002 and AS-003]. The parameters and commitments as set out in Table 4.1 of the Design Principles, Parameters, and Commitments [APP-213] have been used to inform a reasonable worst-case assessment of the Solar PV Modules and Mounting Structures within the EIA.	PINS Ref	Name	MWp	Solar Area (hectares)	Hectares / MWp	Solar (Acres)	Acres / MWp	EN010085	Cleve Hill Solar Park	373	176	0.5	436	1.2	EN010101	Little Crow Solar Park	175	153	0.9	379	2.2	EN010106	Sunnica Energy Farm	627	621	1.0	1535	2.4	EN010118	Longfield Solar Farm	371	275	0.7	680	1.8	EN010123	Heckington Fen Solar Park	500	417	0.8	1031	2.1	EN010127	Mallard Pass Solar Project	350	420	1.2	1038	3.0	EN010131	Gate Burton Energy Park	531	474	0.9	1171	2.2	EN010132	West Burton Solar Project	661	734	1.1	1814	2.7	EN010133	Cottam Solar Project	871	879	1.0	2173	2.5	EN010149	Springwell Solar Farm	800	656	0.8	1621	2.0	EN010159	One Earth Solar Farm	1048	945	0.9	2335	2.3	EN010151	Beacon Fen Energy Park	400	479	1.2	1184	3.0
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Number	Party	Action	Response
22	The Applicant	Respond to the points raised by BEPS, including: • Clarify why it is not possible to determine the type of panels and their locations at this stage, given the applicant's assessment in the ES and information concerning landform. • Confirm the minimum separation distances between the panels and how secured. • Confirm whether the application could ultimately be delivered with a greater maximum capacity in the absence of a cap on maximum capacity. • Noting The Drovers Solar Farm includes a standoff distance from homes of 250m, clarify why the standoff distances proposed for East Pye Solar are 50m.	<u>Bullet Point 1</u> The Applicant has used a Rochdale Envelope approach to designing and proposing the Scheme for consent. The indicative design is consistent with the physical parameters specified in and controlled by the DCO / secured documents. This approach provides the Applicant with flexibility to design a scheme at the detailed design stage, which maximises the benefits delivered by the Scheme through optimising the use of available technology in the later stages of procurement and prior to construction, without causing rise to any unassessed impact. In some cases, the requirement for Single Axis Tracker Panels or Fixed Panels will be informed by further surveys to inform the final siting of panel rows, which would be programmed as part of the detailed design stage. Other factors, including supply chain factors, may also influence the selection of panel orientation and layout. Therefore, and in order to be able to deliver a scheme which maximises its benefits, the Applicant seeks flexibility in the DCO to be able to install either panel configuration across the sites. The Design Principles, Parameters, and Commitments [APP-213] confirms that the lowest edge of the Solar PV Panels will be set at a minimum of 0.4m above ground level. Where Solar PV Panels are situated in areas of 'low' to 'high' surface water flood risk, the Solar PV Panels will be raised higher where practicable, or the use of Single Axis Tracker panels will be considered.

Number	Party	Action	Response
			<u>Bullet Point 2</u> As explained by Mr Yeates in ISH1, and as set out in the Written Summary of the Applicant's Oral Submissions made at ISH1, the Design Principles, Parameters and Commitments [APP-213] sets out that the minimum separation distance between solar modules will be 2.5m (in the event that either Single Axis Tracker Panels or Fixed Panels are used). The maximum separation distance between solar module centrelines will be 15m (Single Axis Tracker Panels) or 14m (Fixed Panels). These commitments are secured through Requirement 5 which provides that no part of Work No. 1 (solar PV) may commence until details relating to that part have been submitted to and approved by the relevant planning authority. The details submitted must accord with the design principles, parameters and commitments (Requirement 5(2)) of the Draft DCO [AS-032]. <u>Bullet Point 3</u> Yes, provided that the control parameters set out in the DCO are met. This would increase the benefits of the Scheme without increasing any impacts arising (because the control parameters have been used to assess the impacts of the Scheme). Delivering the greatest decarbonisation, energy security and affordability benefits from the Scheme is consistent with the Government's policy approach to achieving a Clean Power system on the way to Net Zero. To artificially limit the benefits of the Scheme (for example by capping capacity in the DCO) could prevent the

Number	Party	Action	Response
			Scheme from delivering incremental benefits without causing any additional impacts over those assessed. DCO precedent consistently demonstrates that capacity limits should not be imposed where greater generating capacity can be delivered within the assessed environmental envelope. A capacity cap in those circumstances would serve no planning purpose and would unnecessarily restrict renewable energy generation. Paragraph 2(4) of Schedule 15 (procedure for discharge of requirements) secures this by providing that any application made to the relevant planning authority for discharge must include a statement to confirm whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement and if it will then it must be accompanied by information setting out what those effects are. This ensures that to the extent that the design documents include flexibility for maximum parameters, the scheme to be delivered will ultimately be delivered within the environmental scope of the assessed Scheme. <u>Bullet Point 4</u> The minimum offset distance from the curtilage of residential properties is 50m, as set out in the Design Principles, Parameters and Commitments [APP-213]. To clarify, the Doves sets out that Standalone Conversion Units will be located at least

Number	Party	Action	Response
			250m away from residential properties but does not have a similar limitation for the panels themselves. In any event, a buffer from residential properties is assessed on a case-by-case basis, taking into account factors such as landform, the availability of screening vegetation, and other intervening features. While the 50m offset is generally considered effective in flat landscapes, where existing vegetation and proposed landscape mitigation can screen views, it may be less effective in valley landscapes due to differences in elevation. In such circumstances, additional design measures are applied where necessary. For example, solar panels have been removed from Sub-Site 8B to avoid significant effects on the visual amenity of nearby residential properties. The Scheme's design evolution in response to landscape and visual considerations is set out in the Design Approach Document [APP-212], which demonstrates how the design has been refined to minimise landscape and visual effects where required. Although the Applicant's LVIA [APP-034] identifies significant visual effects from some viewpoints, the Residential Visual Amenity Assessment [APP-148] concludes that no residential properties within the defined study area would experience visual effects of such magnitude that it reaches the RVA threshold, due to the nature of the Scheme, the availability of existing screening vegetation and landscape features, and the evolution of the design.

Number	Party	Action	Response
23	The Applicant	Provide more detail on the proposed switchrooms, including an indicative design and potential locations. This could include further detail within the Indicative Masterplan [APP-059]	An illustrative drawing of a switch room has been provided as part of ES Volume 3, Appendix 4.1 - Indicative Illustrative Information [EN0110014/EXAM/6.3.4.1]. However, the Applicant needs to retain full flexibility at this stage of detailed design for the switch rooms to be located anywhere within the scope of Work No. 1 as shown on the Works Plans [AS-002 and AS-003]. The Applicant is unable to provide more specificity in terms of location at this stage. Where relevant to the environmental topic, this flexibility has been assessed accordingly within the EIA. For example, a height of 4.5 m has been assumed across the entirety of Work No.1 within ES Volume 1, ES Chapter 7 - Landscape and Visual [APP-043]. The switch rooms have also been considered with regards to agricultural land, see paragraph 15.8.23 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The function of the 33 kV Sub-distribution Switch Rooms are principally used to collect and route generated power to the Project Substations. As such, they would be expected primarily to contain switchgear and associated protection and control equipment, rather than substantial continuously operating noise-generating plant. On that basis, operational noise emissions would be expected to be limited. The Outline OEMP [APP-197] secures the commitment of controlling noise levels. Noise emitting plant will be selected with consideration of noise emissions where practicable. In addition, the following measures will apply:

Number	Party	Action	Response
			At receptors NSR2A, NSR2B, NSR3A and NSR3B, which are near to the BESS: - The overall night-time and early morning period free-field rating level from the Scheme at receptor facades shall not exceed the sound levels set out in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], or 30 dB $L_{Ar,Tr}$, whichever is higher. - The overall daytime and evening free-field rating level from the Scheme at receptor facades shall not exceed the sound levels set out in the Evening Noise Assessment or 30 dB $L_{Ar,Tr}$, whichever is higher. At all other receptors: - The overall sound level from the Scheme along the PRoW will not exceed 55 dBA, and mitigated where practicable to not exceed 50 dBA. - Equipment will be mitigated to ensure that the overall free-field rating level from the Scheme at receptor facades shall not exceed the background sound level or 30 dB $L_{Ar,Tr}$, whichever is higher. The detailed design will therefore be required to achieve the assessed and secured noise limits.
24	The Applicant	Clarify the reason for the cable corridor connecting parcels 7G/ 7H with site 6	The cable corridor connecting parcels 7G/7H to with Site 6, is to route the cables from Site 8 and Site 9 into the 400kV substation in Site 5. Although it is possible to route the cable through Site 7, this would be electrically inefficient and would impose on the

Number	Party	Action	Response
			constructability of this section of the Scheme. As such, this section of the CRC is necessary from a technical and commercial feasibility perspective in accordance with NPS EN-1, paragraph 4.3.15.
25	The Applicant	Engage further with the local authorities regarding the type and design of the proposed fencing within and surrounding the proposed development	The Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on the design principles for the Proposed Development. A meeting was held on 28 September 2026 to discuss the level of detail and certainty provided by the Design Principles, Parameters and Commitments [APP-213] document, including the design and finishes of infrastructure, including fencing. Ongoing dialogue will take place between the parties with further meetings scheduled in the next 2 weeks following Deadline 1. Updates relating to design matters will be set out in the Design Principles, Parameters and Commitments [APP-213] document at a later deadline as engagement continues. In any event, Requirement 10 of the Draft DCO [AS-32] ensures that no part of the authorised development may commence until written details of all proposed temporary or permanent fences, walls or other means of enclosure have been submitted to and approved by the relevant planning authority. Therefore, the oversight of the relevant local authority for the final design is already secured.
26	The Applicant	Confirm the approach to site 6 and its use as a construction compound.	The Applicant can confirm the construction compound referred to ('temporary construction and decommissioning laydown area')

Number	Party	Action	Response
		Confirm whether site 6 would only be used as a compound during construction and, following reinstatement, whether it would be subsequently reused as a compound during operation and maintenance	(Work No. 6)) is not located in Sub-Site 6. It is located on the north side of the B1527 aligned with CRC8. As set out in Point 2.7.3 of the Outline Cable Route Construction Statement [APP-216] the land used for the compound / laydown area will be reinstated following completion of the construction works. It is not intended to reuse the compound / laydown area during operation and maintenance.
27	The Applicant	Respond to the comments of David Hook (Hempnall Parish Council, Campaign to Protect Rural England (CPRE)) in respect of lighting proposals: 1. Misuse of the CPRE interactive light pollution and tranquillity map 2. Request for the Applicant to confirm whether lighting on-site during construction and operation will be enclosed in full cutoff flat glass fitments that are pointed directly downwards to ensure there's no upwards or outwards light spillage? 3. Will the Applicant ensure that lighting will not be controlled by dusk to dawn sensors, i.e. no	The Applicant notes the comments made by Mr Hook, recorded within the Transcript of Issue Specific Hearing 1 (ISH1) Part 4 [EV6-009] (00:23:21:10 - 00:23:44:10). The Applicant's response to the points made by Mr Hook are summarised below: 1. The CPRE data has been reproduced with the permission of CPRE to use the GIS shapefiles provided by them. The mapping has been clipped to the Site boundary & study area and presented using a colour scheme consistent with this assessment; however, the underlying datasets remain unchanged and have not been modified, manipulated or reinterpreted. 2. Any new external lighting will be mounted horizontally and directed downwards towards the intended area of illumination. Luminaires with full-cut off optics and a zero upward light ratio (ULR) will be used to ensure no direct upward light is emitted. 3. All new light fixtures will be controlled via motion sensors and will only activate when movement is detected within the relevant area. The lighting will remain switched off under normal conditions and will not be operated continuously overnight.

Number	Party	Action	Response
		permanent overnight lighting at any time? 4. Request for the Applicant to confirm that on-site lighting will be operated and only on when needed for operation purposes. 5. Highlighted concerns about the use of PIR sensors being triggered by animals and the importance of a sensitive lighting strategy in a rural dark landscape, which is treasured locally, nationally and internationally.	4. All new lighting will remain off as default, and will only be operational when the Site is occupied by maintenance personnel. 5. Motion sensors will be carefully positioned and oriented to detect human and vehicle movement approaching the access points and immediate perimeter. Sensor sensitivity will be appropriately calibrated to avoid activation from small heat signatures and activity beyond the intended detection area. Where triggered, the lighting will remain illuminated only for a short, appropriate period following the last detected movement before automatically switching off. Paragraph 2.6.1 of the Outline CEMP [APP-196] states '<i>Lighting will be required during construction for safety reasons but will be temporary in nature and predominantly limited to the core working hours. Any requirement for lighting outside standard working hours will be set out within the detailed CEMP and implemented in accordance with the Requirement of the Draft DCO [EN0110014/APP/3.1]. The principles for lighting relating to construction activities, as set out in ES Volume 3, Appendix 7.11 – Lighting Strategy [EN0110014/APP/6.3.7.11], will be adhered to.</i>' Paragraph 2.7.4 of the Outline Operational Environmental Management Plan (OEMP) [APP-197] states that '<i>Lighting for the operational phase will be substantially in accordance with the principles for lighting as set out in ES: Volume 3, Appendix 7.11 – Lighting Strategy [EN0110014/APP/6.3.7.11]</i>'. Approval of the detailed CEMP and OEMP by the relevant planning authority is sought under Requirements 13 and 14 of the DCO, and as described above, controls on lighting (as set out in

Number	Party	Action	Response
			ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] will be included as part of these plans. As such the Applicant considers sufficient controls are in place to ensure the type of lighting measures described above will be delivered. It is not necessary for the controls to be duplicated in the DPPC because the lighting measures are already subject to the approval of the relevant planning authority in discharging the CEMP and OEMP.
28	The Applicant	Confirm the phasing for construction compounds	The exact phasing of the laydown areas / compounds will be aligned with the final sequencing of the construction programme which is subject to detailed design, secured through Requirement 2 (Commencement of the authorised development). An indicative construction programme is provided in Figure 2.1 in the Outline CTMP [APP-201] .
29	The Applicant	Confirm the approach to the use of site 6 as a construction compound with reference to its proposed use as a biodiversity area for a period of 25 years	Please see response to point 26 above. As the construction compound falls outside of Site 6, the proposed use as a biodiversity area is unaffected.
30	The Applicant	Correct discrepancies between the Indicative Masterplan [APP-059] and the Works Plans [AS-002] [AS-003], including but not limited to areas shown as retained agricultural land, proposed mitigation areas, and biodiversity areas. Clarify potential further discrepancies in respect of areas shown as both cabling works	The Works Plans [AS-002 and AS-003] reflect securing mitigation and enhancement for the purposes set out in the Outline LEMP [APP-199] , including for skylark and Biodiversity Net Gain. Main broad habitat areas are represented by Work 10. Work 10 comprises areas that: (a) Are not, or would no longer be, arable farmland for agricultural purposes; or

Number	Party	Action	Response
		and mitigation areas, for example on sheet 3 of the Works Plans [AS-002].	(b) Arable farmland that would continue to be farmed for agricultural purposes, but which would include skylark mitigation in the open farmed area of the field (e.g. unseeded areas), and/or other mitigation/enhancement in the field margins. This distinction between (a) and (b) above is shown in the illustrative masterplan since ongoing farming practices will be visible in the retained agricultural areas, but such methods would not continue in the areas shown solely for potential mitigation and enhancement. Since both approaches contribute to mitigation and enhancement, they are shown as a common Work number. For clarity the key in the Indicative Masterplan [EN0110014/EXAM/6.2.4.1] has been changed to replace the existing: <u>“Proposed Planting, Ecological Mitigation and Enhancement*</u> <i>Key item 1:</i> Area for potential mitigation and enhancement <i>Key item 2:</i> Retained agricultural land” With: <u>“Proposed Planting, Ecological Mitigation and Enhancement*</u> <i>Key item 1:</i> Area for potential mitigation and enhancement <i>Key item 2:</i> Mitigation and enhancement aligned with continued arable agricultural use”

Number	Party	Action	Response
			The existing footnote amended by adding “and ecology”, as follows: “*for further details of proposed landscape and ecology measures refer to Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4]” Works 10 is intentionally coexistent with cabling works, which are compatible with it, in a number of locations, e.g. the southwest portion of Site 9 (Works 1(d) and 6B) and the central portion of Site 8A/B (again Works 1(d) and 6B). Sites are as numbered on the Indicative Masterplan [EN0110014/EXAM/6.2.4.1]. Works 11 (creation of permissive paths) also coexists with compatible cabling works in various sheets of the Works Plan, including in the central portion of Site 8A/8B and in Site 4B. The extent of Works 1(d) and 6B is intended to provide flexibility and efficiency in the ultimate cabling arrangement at detailed design stage. Separately, in the Draft DCO [AS-032], Works 4B (works in connection with the new National Grid substation), 5B (works in connection with a connection to the existing overhead transmission line) and 7 (other works), include reference to “<i>landscaping and biodiversity mitigation and enhancement measures including planting</i>”. These Works also include reference to electrical/telecommunications connections. Work No 7 in particular is also intended to allow for future flexibility during detail design to include additional mitigation and enhancement

Number	Party	Action	Response
			measures, as set out in paragraph 3.5.6 of the Outline LEMP (Rev 2) [EN0110014/EXAM/7.4]. The co-location of cabling and mitigation and enhancement measures reflects the opportunity within the engineering works to implement a coherent landscape and ecological approach in line with both the Outline LEMP (Rev 2) [EN0110014/EXAM/7.4] and its appended Green Infrastructure Strategy, both by considering areas that are not ultimately used for cabling, or which may merely be restricted by cabling installation. The intent to create a seamless landscape and ecological approach over cabling, regardless of Works items containing cabling is indicated in the Indicative Masterplan [EN0110014/EXAM/6.2.4.1].
31	The Applicant	Clarify whether biodiversity areas would also be used as access for maintenance activities, such as washing of panels	The Applicant has sought to use existing site accesses where practicable. Once operational the Scheme will be subject to the controls as set in the relevant management plans. Regarding this issue on vegetation and maintenance the relevant plans include the Outline OEMP [APP-197], Outline LEMP [APP-199] and Outline OTMP [APP-202]. As defined on the Green Infrastructure Strategy [AS-005] the Scheme includes a range of environmental measures, which as features will all be subject to their own management as defined in the Outline LEMP [APP-199] and secured in the subsequent LEMP and Requirement 7 of the Draft DCO [AS-032]. Areas of biodiversity creation such as Retained Agricultural Land including areas for Skylark Mitigation, Arable Field Margins

Number	Party	Action	Response
			(Priority Habitat), and Ghost Pond creation all exclude solar development or other infrastructure and therefore will not be subject to maintenance activities associated with that infrastructure. Likewise, areas of hedgerow, individual trees, liner tree belts and woodland creation, and areas where existing hedgerow improvements are proposed do not contain solar or other infrastructure and therefore would not be subject to subject to maintenance activities associated with that infrastructure. Beneath the solar panels Modified Grassland creation is proposed, and within these areas there would be a low-level requirement for occasional access for maintenance activities. The Biodiversity Net Gain Statutory Metric [APP-219] calculates the post-construction value of all habitats within the operational sites, rather than habitats managed for biodiversity alone. This includes areas where operational activities will be undertaken (such as cleaning panels within areas of land used for Solar PV). BNG is secured through Requirement 9 of the Draft DCO [AS-032].
32	The Applicant	Clarify why a standalone aviation assessment was not undertaken	The EIA Scoping Report considered the effects on aviation receptors with regards to glint and glare. This was agreed through the Scoping Opinion and as such ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025 to AS-029] served as a basis to identify aerodromes that could be potentially impacted by the Scheme. Following further consultation and dialogue, concerns were raised from stakeholders with regards to aviation safety (the detail of this dialogue is set out in Applicant's Position Statement on

Number	Party	Action	Response
			Aviation [PDA-006]. In February 2026) a High Level Investigative Report [APP-222] was undertaken that investigated the impact to Engine Failure After Take-Off (EFATO) and Glider Launch Failure (GLF), thermal updrafts, and wind shear and turbulence, upon aviation activity associated with Norfolk Gliding Club at Tibenham Airfield, which concluded that there was no significant effects with regards to those three items. The Applicant therefore considers that it has assessed impacts on aviation receptors. See the Applicant's Written Summary of Oral Submissions at ISH1 which responded to this.
33	The Applicant	Confirm to what extent other aviation matters, beyond glint and glare, were scoped out of the assessment and provide justification	See the response to Action Point 32. In any event, the Applicant has assessed all concerns raised by the aerodromes, which included glint and glare [AS-025 to AS-029] , land available in the event of an emergency landing [APP-222] , wind shear [APP-222] , turbulence [APP-222] and thermal updrafts [APP-222] .
34	The Applicant	Provide a standalone document on aviation safety to the examination	The Applicant's position in respect of aviation safety is already set out in the Applicant's Position Statement on Aviation [PDA-006]. The Applicant does not consider that a standalone aviation safety document is necessary at this stage, as the relevant information on aviation safety has already been provided to the Examination through that document. The Applicant remains committed to ongoing engagement on aviation matters and has arranged a meeting with the Norfolk Gliding Club (NGC) and the General Aviation Awareness Council (GAAC) on 14 October 2026 to discuss the issues raised during the Examination. Any matters arising from those discussions can

Number	Party	Action	Response
			be reported at subsequent Examination deadlines, where appropriate. In addition, the Statements of Common Ground with NGC and GAAC, submitted at Deadline 1, can be updated at future deadlines to reflect the outcomes of ongoing discussions and record any areas of agreement or disagreement reached between the parties.
35	Ann Bartaby	Provide a reference for the appeal referred to in your hearing representation	N/A
36	The Applicant	Detail how the proposed development would cross the high-pressure gas pipeline within the order limits	The proposed development crosses the National Gas Transmission Feeder Main FM05 (Yelverton to Stowmarket) high-pressure gas pipeline, shown on ES Volume 2, Figure 18.1 - Utilities Plan [APP-110]. The pipeline passes through Sub-Sites 5A, 5B, 7B, 7E, 7F and CRC7, meaning crossings occur via interconnecting cables and access/haul routes within these Sub-Sites, and via the Cable Route Corridor at CRC7, which links the north of Sub-Site 5B to the south-east edge of Sub-Site 7B. Within the Sites, the Applicant has provided / applied an easement for identified utilities, which are at risk of causing a major accident or disaster. The easement has been provided to reduce interaction between the Scheme and identified utilities, with refinement of buffers to take account of the High Pressure Gas Main within the site applied at Sub-Site 5A, 5B, 7E and 7F. For CRC7, trenchless techniques would be undertaken, meaning the cable would be installed underground without open trenching

Number	Party	Action	Response
			through the most sensitive landscape features, with the appropriate trenchless technology (which may include tunnelling, HDD, Pipe Jacking and Horizontal Auger Boring) confirmed at detailed design stage through the Outline Cable Route Construction Statement [APP-216]. Protection is secured through Part 5 of Schedule 14 of the Draft DCO [AS-032], which requires that at all times when carrying out any works authorised under the Order National Gas must comply with National Gas's policies for safe working in proximity to gas apparatus "<i>Specification for safe working in the vicinity of National Gas, High pressure Gas pipelines and associated installation requirements for third parties T/SP/SSW22</i>" and HSE's "<i>HS(~G)47 Avoiding Danger from underground services</i>". For site accesses and access roads the works would be subject to published best practice for works within the highway, through the request of asset information from utility company and diversion of services where necessary. Where these impact existing services in areas off highway this would be subject to the existing way leave agreements associated with the assets across private land. If there are any specific utilities within the order limits that are of a concern, early notification of these to the Applicant would help assist works planning and inform the design. There is ongoing dialogue with National Gas regarding the form of the protective provisions and the Statement of Common Ground will be updated to reflect these discussions as they progress.
37	The Applicant	Provide clarification as to why The Krons was chosen as an access	The Applicant had dialogue with Norfolk County Council (NCC) as Local Highway Authority regarding construction vehicle routeing to

Number	Party	Action	Response
		point, with reference to ecological assessment and discussions with NCC highway authority	reach the internal haul route for Sub-Sites 7A-F. The original proposal was to use a short section of Fairstead Lane from the A140 to the access point for Sub-Site 7A. However, after dialogue with NCC the preferred route was identified as via the B1527, The Krons and Fairstead Lane to reach access A31 for Sub-Site 7C and the internal haul route. The dialogue can be found in the notes from a meeting on 09 December 2025 in part four of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-177]. The Applicant and NCC are continuing dialogue to agree a suitable vehicle management regime to avoid ecology impacts. It is likely that pruning of vegetation and canopy raising will be required on sections of The Krons to allow for safe vehicle manoeuvring along with the introduction of new or improved existing passing places.
38	The Applicant	Submit copies of draft statements of common ground (SoCGs)	The Applicant has submitted draft Statements of Common Ground with all of the relevant parties set out in the Examining Authorities Rule 6 letter [PD-005] at Deadline 1.
39	The Applicant	Provide further information on abnormal indivisible loads (AIL) routes	Abnormal load specialists Wynns have undertaken vehicle swept path work of the proposed abnormal load routes based on the transformer and cable drum specification and associated abnormal load vehicle configuration. The drawings and associated commentary are provided in part three of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-176]. AIL Management Measures are set out in point 6.4 of the Outline CTMP [APP-201] and summarised below.

Number	Party	Action	Response
			All AIL movements will be managed by a specialist haulage contractor to ensure safety and compliance. Traffic management arrangements will be agreed in advance with National Highways, LHA and other relevant local highway authorities, structures' owners and the police, where necessary, before any AIL movements take place. Requirement 15 (Construction Traffic Management Plan) secures that no part of the authorised development may commence until a construction traffic management plan has been submitted to and approved by the relevant planning authority, in consultation with the relevant highway authorities. Application for notification of AIL deliveries must be made by transport (haulage) operators, preferably through the Electronic Service Delivery for Abnormal Loads (ESDAL2) system. If the ESDAL2 system is not used, an application for AIL movement must be submitted in adequate time to allow consultation, planning and further notification. These arrangements are likely to include: • Notification to the LHA, structures' owners and police prior to each movement; • Planning and approval of the route with relevant authorities; • Advance communication with stakeholders along the route regarding timing and details of the movement; • Use of appropriate vehicle markings, plates, and lighting for visibility and safety; • Escorting vehicles to the Sites where required; and

Number	Party	Action	Response
			Implementation of rolling road closures if necessary to maintain safe passage. These measures will help ensure that AIL are transported efficiently while minimising disruption to the SRN and LRN.
40	The Applicant	Consider opportunities to engage with local botanists with regards to records of rare plant species	The Applicant is willing to consider opportunities to engage with local botanists to better understand the data referred to, if contact details can be provided to the Applicant.
41	The Applicant	Explain how the assessment moved from acknowledging the potential for adverse effects on some individuals to concluding that significant adverse effects would not occur at the population level	The Applicant's approach within the Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] is consistent with ISEP (2022) guidance on '<i>Effective Scoping of Human Health Assessments in EIA</i>' and '<i>Determining Significance for Human Health in EIA</i>', which promotes a proportionate assessment of population and human health effects and the integration of health considerations across relevant environmental topics. The Human Health Summary Statement was therefore prepared to draw together health-related findings from the Environmental Statement rather than duplicate the detailed technical assessments. In accordance with that approach, the assessment identified potentially sensitive and vulnerable groups and considered receptor sensitivity, pathways of effect, significance and mitigation. While it recognised that some individuals may experience adverse effects differently from others, significance was assessed by reference to effects on the affected population as a whole. This accords with the approach set out in Chapter 5 of the ISEP (2022)

Number	Party	Action	Response
			<i>'Guide to Determining Significance for Human Health in EIA'</i> which promotes a population health level assessment. The assessment therefore distinguished between potential effects experienced by individual receptors and likely significant effects on population health. Having regard to the scale, extent, duration and severity of effects, together with the embedded and secured mitigation measures, it concluded that the Scheme would not result in any likely significant adverse effects on population and human health.
42	The Applicant	Confirm whether any separate consideration was given to the effects of concern or anxiety arising from perceived risks irrespective of the likelihood of the risks materialising	The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and the Equality Impact Assessment [APP-214] considered the ways in which perceived risk can influence wellbeing, recognising that concerns regarding environmental change, safety and loss of place attachment may affect people. The assessments considered matters such as perceived safety, access to nature, visual amenity, neighbourhood character, and concerns regarding property and business impacts. While acknowledging that these issues may cause stress or anxiety for some individuals (see sections 18.6.251 to 18.6.256 of the Human Health Summary Statement and Table 8.2 of the Equality Impact Assessment and summarised in section 9.1), the assessment concluded that they would not be likely to give rise to significant population-level health effects when considered alongside the mitigation secured as part of the Scheme. The Applicant has submitted a Mental Health and Wellbeing Addendum at Deadline 1 to provide further detail on these

Number	Party	Action	Response
			wellbeing pathways, including uncertainty, perceived environmental change, place attachment, access to nature and cumulative wellbeing effects. No likely significant population-level health effect has been identified.
43	The Applicant	In a response to a question from BEPS regarding the safety of horse riders using bridleways, the applicant committed to submit to the East Pye Solar examination a cross reference to the findings of relevant equine safety experts that directly address the matters raised in BEPS' question	The reference made in Examination was to the Sunnica Energy Farm, where the applicant for that project engaged horse behavioural specialists in respect of glint and glare. See the Applicant's Response to ExA Second Written Questions [REP5-056], specifically Q2.7.1. To summarise, this sets out that the advice received was that " <i>glint and glare are natural phenomena that horses experience in all sorts of settings</i> " and in that context, " <i>glint and glare... would not introduce a hazard for equestrian user</i> ".
44	The Applicant	Submit a standalone summary document bringing together all assessment, mitigation and supporting evidence relating to potential mental health and wellbeing effects, including the relevant policy and guidance framework and responses to matters raised during the examination	The Applicant has submitted a Mental Health and Wellbeing Addendum at Deadline 1 in response to matters raised during the Examination. The Addendum has consolidated and provided further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. It is intended to supplement, rather than replace, the assessments submitted with the Application.
45	The Applicant	Consider other Nationally Significant Infrastructure Projects beyond the boundary of the county of Norfolk within the proposed DCO Interrelationships document. Agree	The Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on the Interrelationships document. This includes the scope of the report and the NSIP projects to be included. A meeting was held jointly between the Applicant and

Number	Party	Action	Response
		approach with relevant local authorities	both local authorities on 28 September 2026, the Interrelationships report being an agenda item. Ongoing dialogue will take between the parties with further meetings scheduled shortly after Deadline 1. The Applicant proposes to submit the Interrelationships report into the Examination once the approach is agreed.
46	The Applicant	Confirm whether the EcoPower Suffolk Solar project has been considered in the cumulative effects assessment. Provide an update to the cumulative effects assessment	The Applicant confirms that EcoPower Suffolk Solar EN0110019 is already included within the cumulative developments list, as detailed in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-058] .

Appendix A Desk Top Planning Assessment



Desktop Planning Assessment

Site Name: Long Stratton

Site Address: Various Land Parcels

Development: Proposed Solar PV Farm and Battery Storage

Client: Island Green Power

Date: 06/03/2024

Legend	
	No constraints identified.
	Constraints identified which require investigation and/or mitigation.
	Significant constraint which is likely to affect the viability of the proposed development.

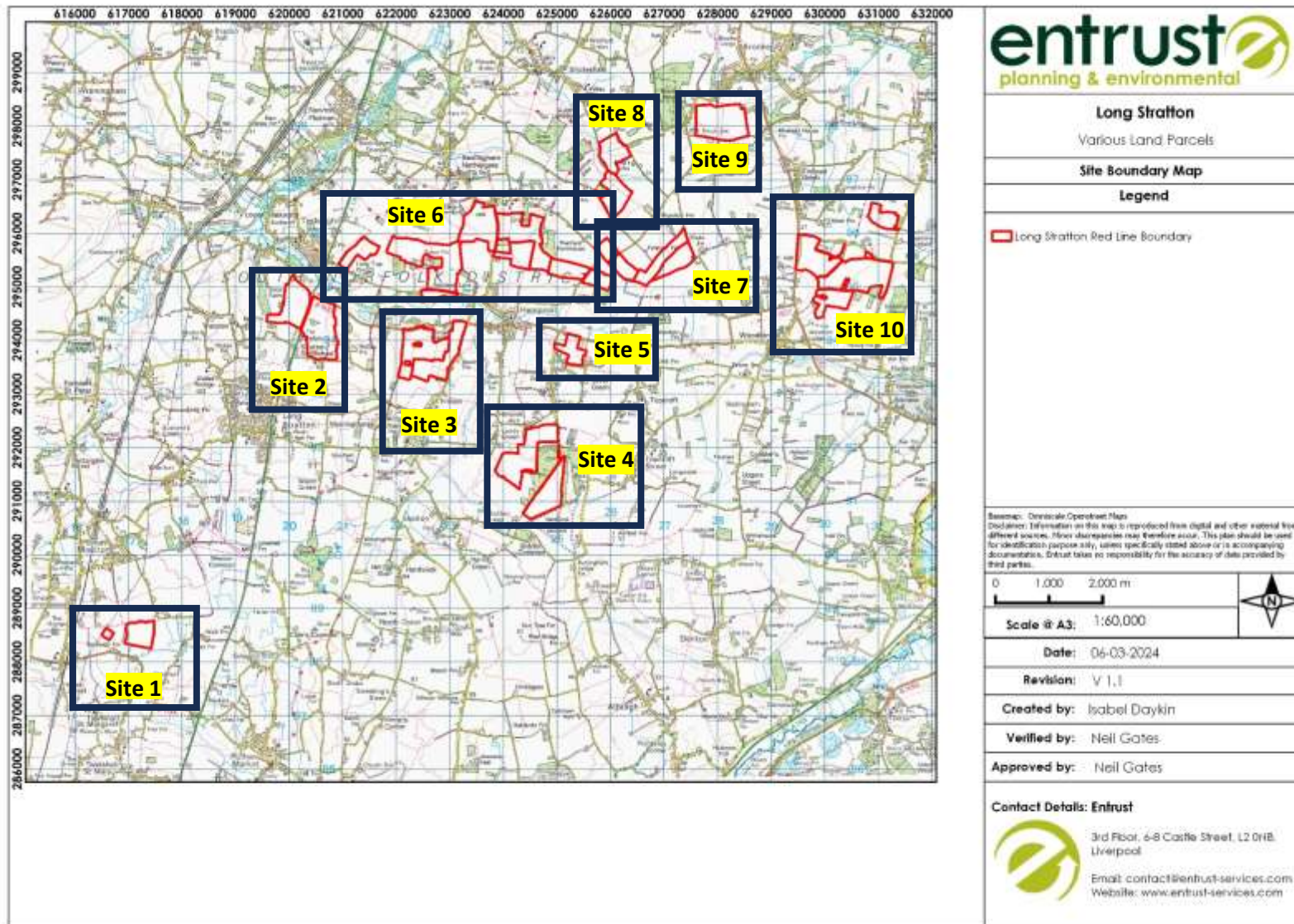
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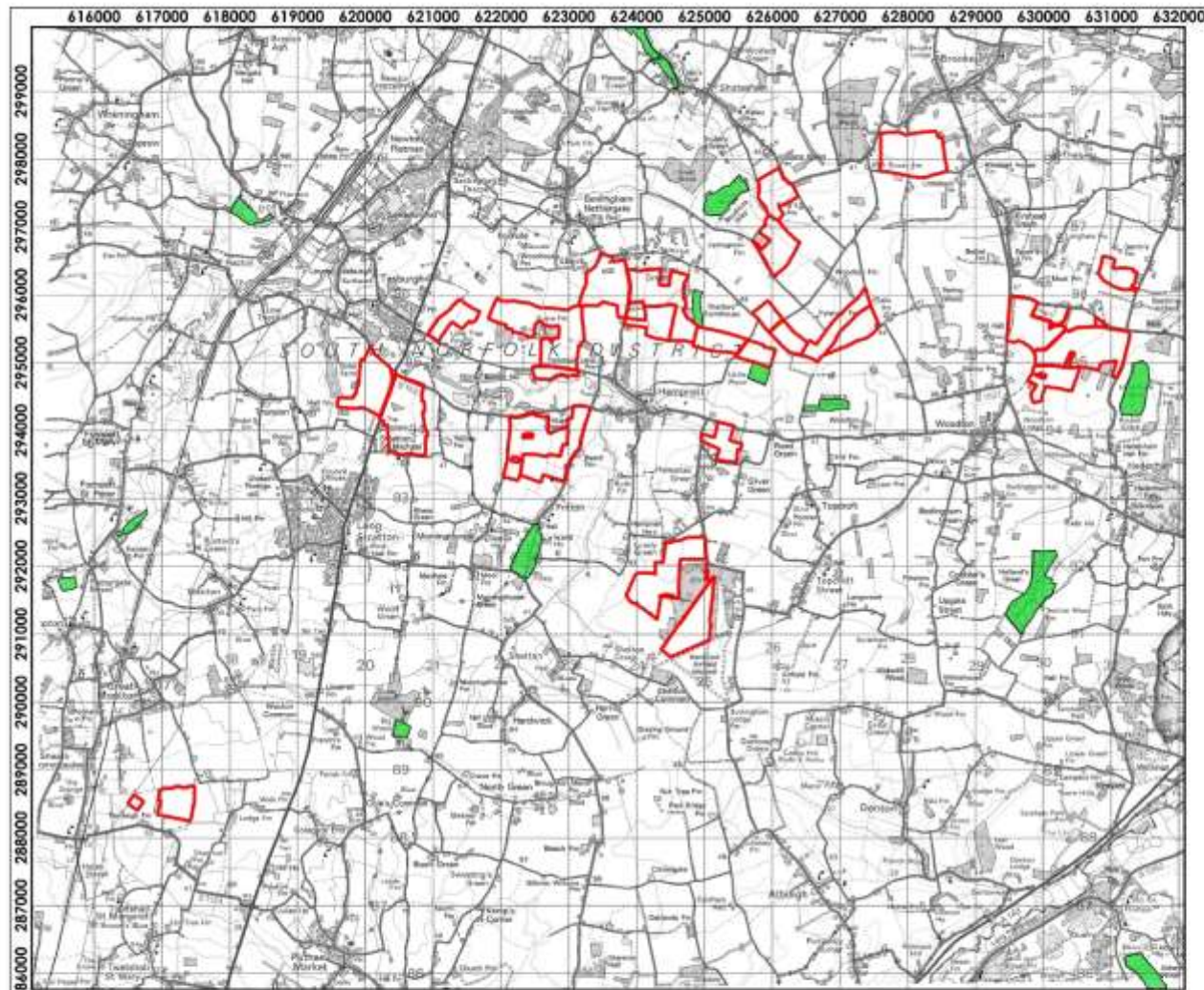
Entrust Professional Services Ltd.
6-8 Castle Street, Liverpool, L2 0NB

Website: www.entrust-services.com

Telephone: +44 (0)151 458 3345

Email: contact@entrust-services.com





Long Stratton

Various Land Parcels

Ecological Designations

Legend

- Long Stratton Red Line Boundary
- SSSI

Basemap: OpenStreetMap
Disclaimer: Information on this map is reproduced from digital and other material from different sources. Minor discrepancies may therefore occur. This plan should be used for identification purposes only, unless specifically stated above or in accompanying documentation. Entrust takes no responsibility for the accuracy of data provided by third parties.

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Scale @ A3: 1:60,000



Date: 06-03-2024

Revision: V 1.1

Created by: Isabel Daykin

Verified by: Neil Gates

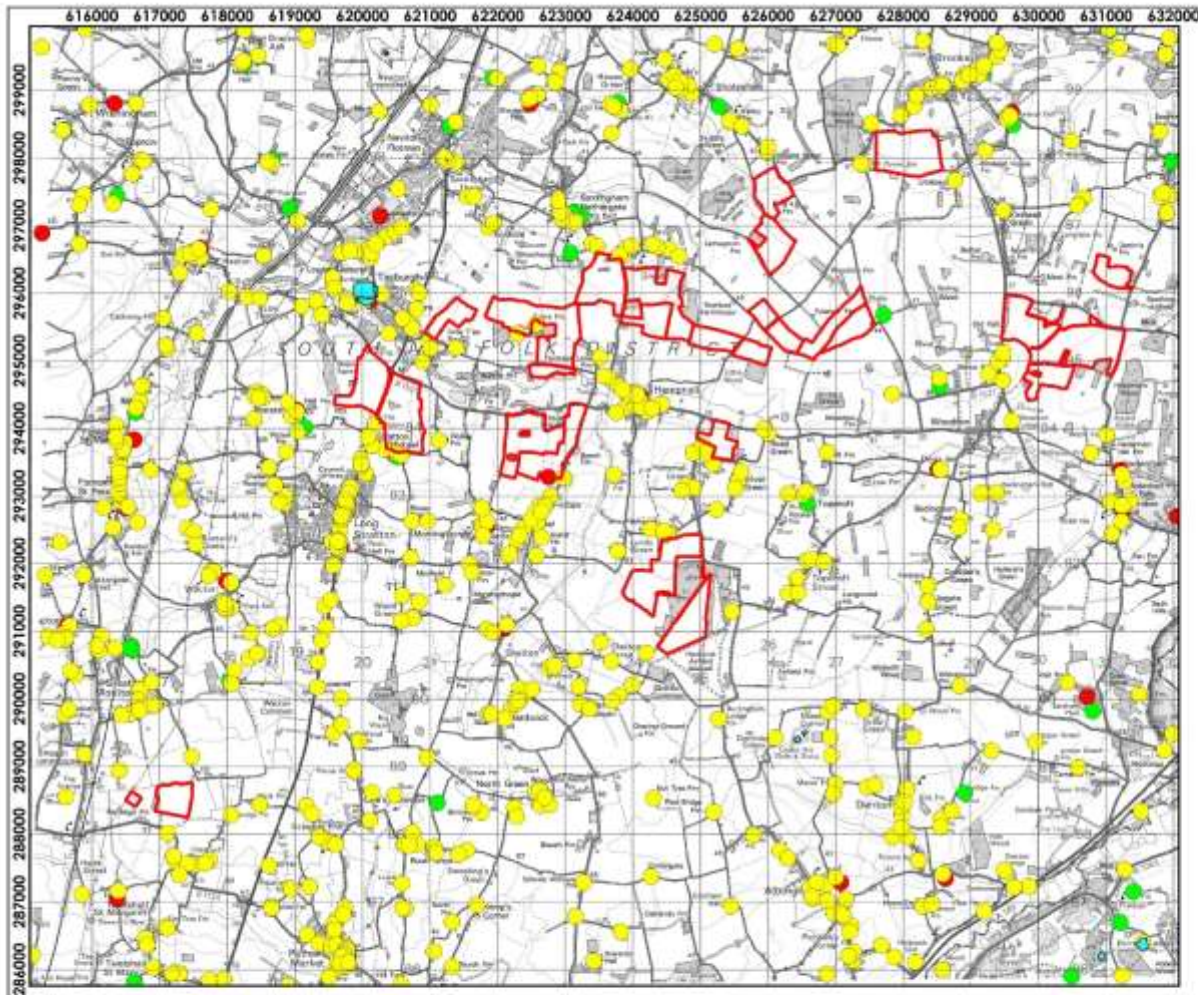
Approved by: Neil Gates

Contact Details: Entrust



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Long Stratton

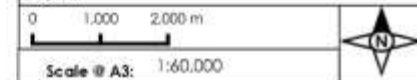
Various Land Parcels

Build Heritage

Legend

- Long Stratton Red Line Boundary
- Scheduled Monument
- ListedBuilding Grade II
- ListedBuilding Grade II*
- ListedBuilding Grade I

Disclaimer: Ordnance Survey Maps
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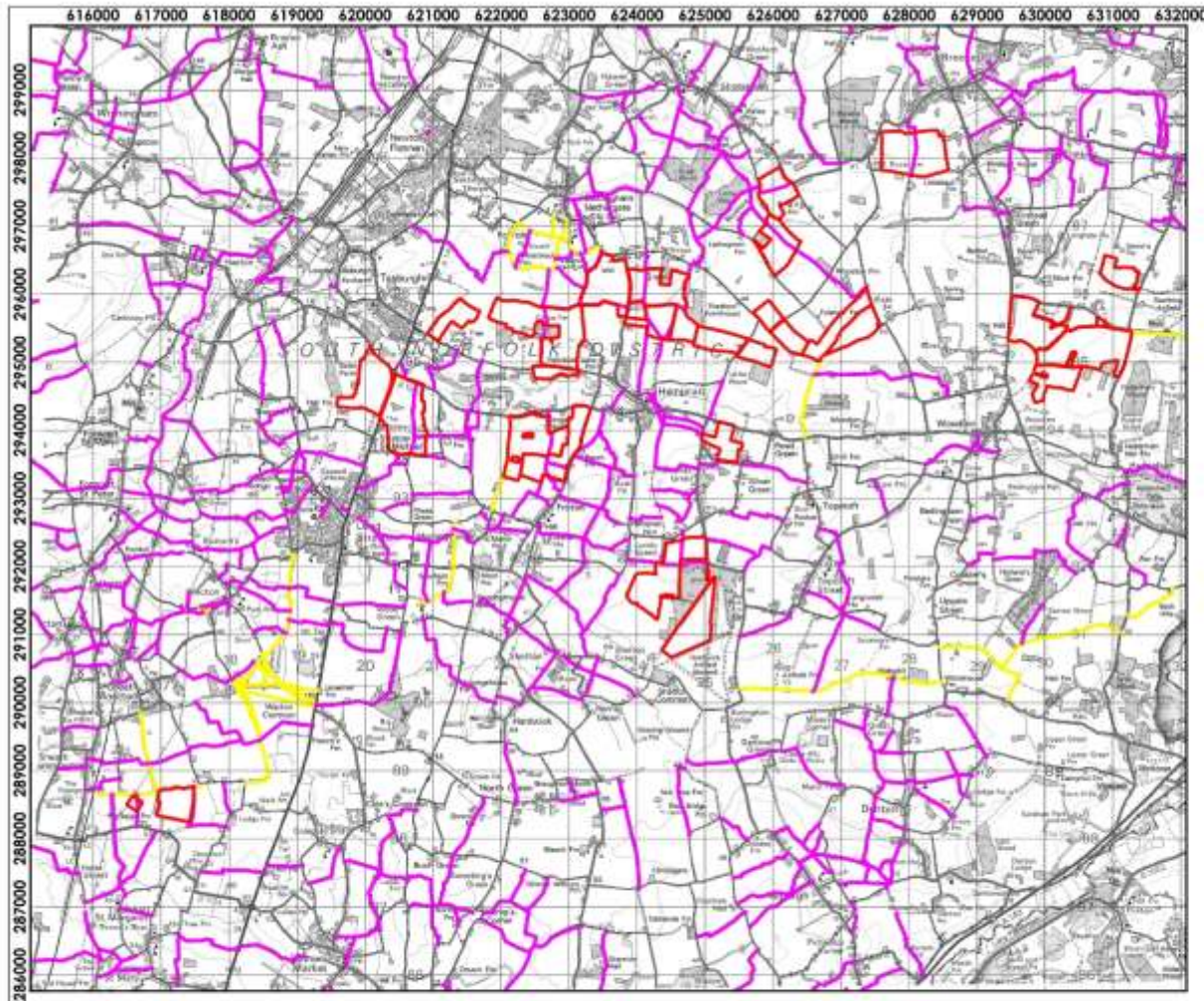
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Long Stratton

Various Land Parcels

PROW

Legend

- ▬ Long Stratton Red Line Boundary
- ▬ Buffers
- ▬ PROW_Footpath_Norfolk
- ▬ PROW_Byway_Norfolk

Basemap: Osmoscale OpenStreet Maps
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Scale @ A3: 1:60,000



Date: 06-03-2024

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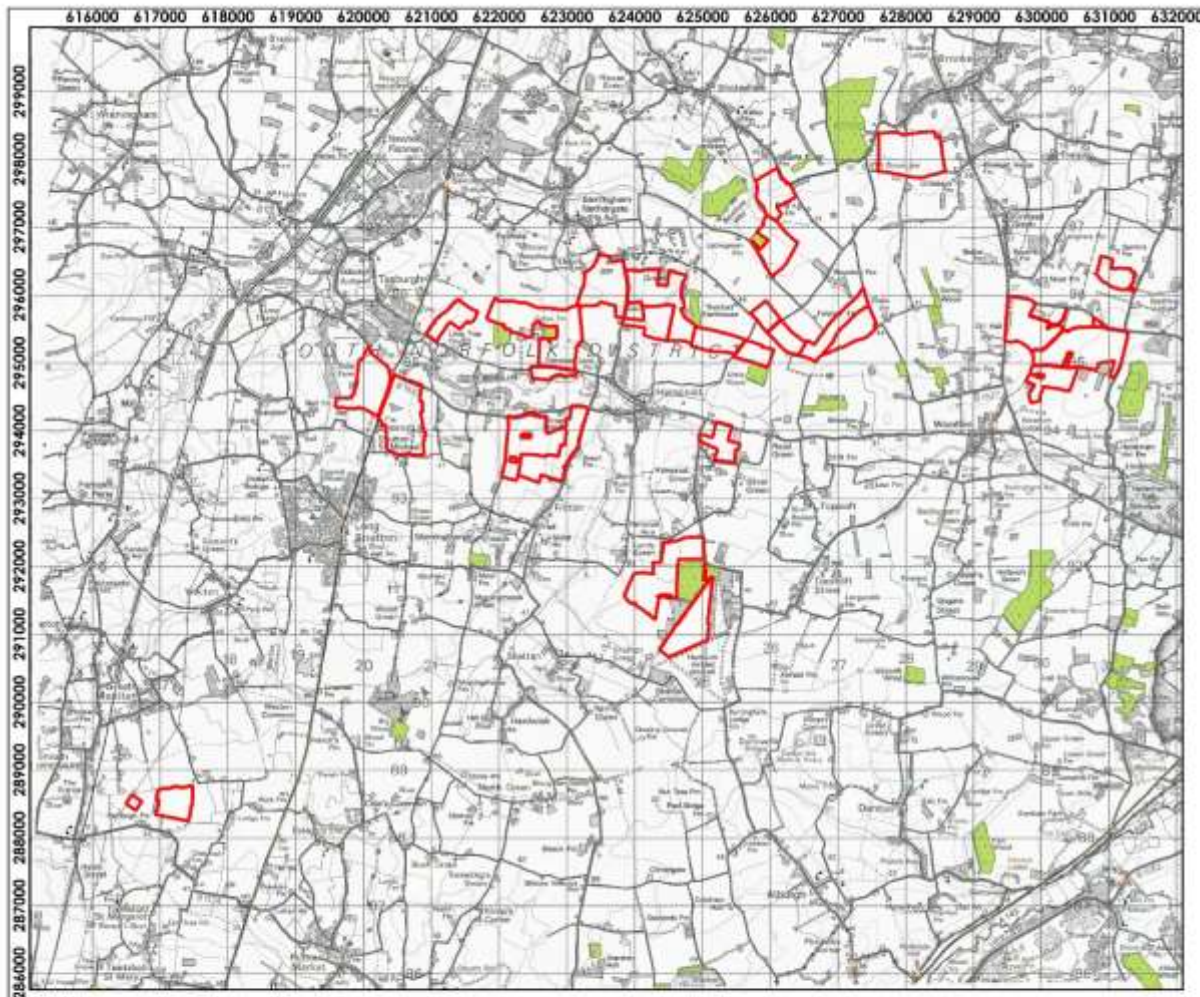
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Long Stratton

Various Land Parcels

Landscape Designations

Legend

- Long Stratton Red Line Boundary
- Ancient Woodland

Base map: Ordnance Survey Maps
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Scale @ A3: 1:60,000

Date: 06-03-2024

Revision: V 1.1

Created by: Isabel Daykin

Verified by: Neil Gates

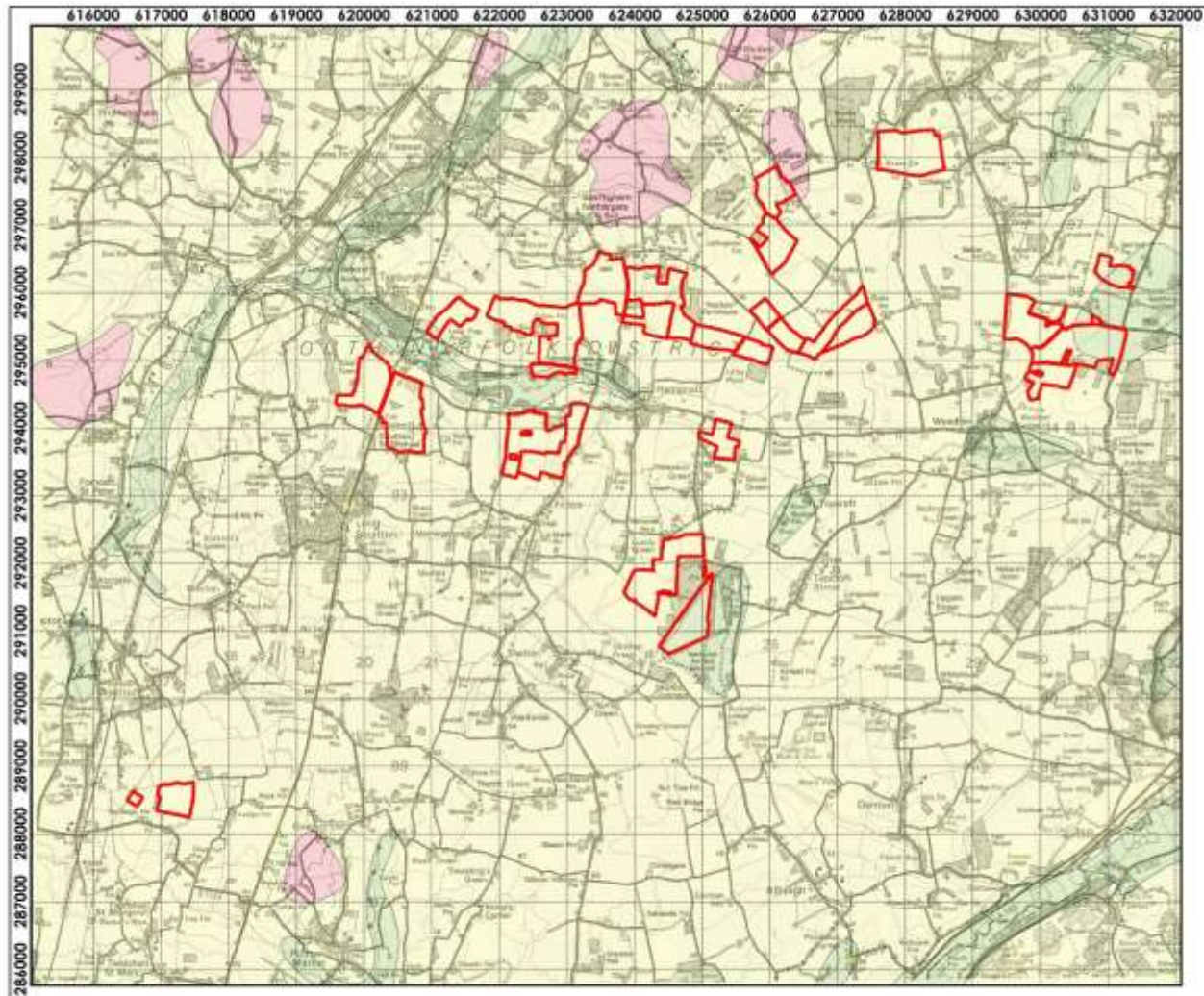
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Long Stratton
Various Land Parcels

Agricultural Land Classification

Legend

- Long Stratton Red Line Boundary
- Agri_Land_G4_England_Norfolk
- Agri_Land_G3_England_Norfolk
- Agri_Land_G2_England_Norfolk

Source: Ordnance Survey Maps.
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Scale @ A3: 1:60,000



Date: 06-03-2024

Revision: V 1.1

Created by: Isabel Daykin

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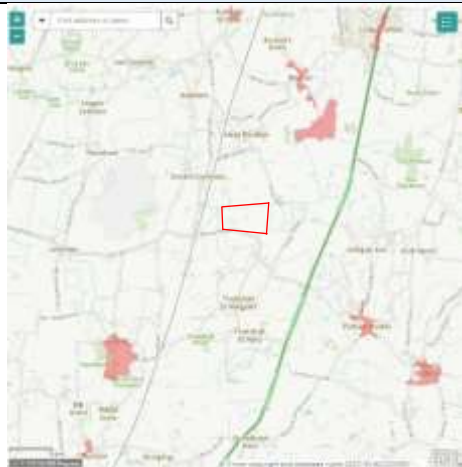
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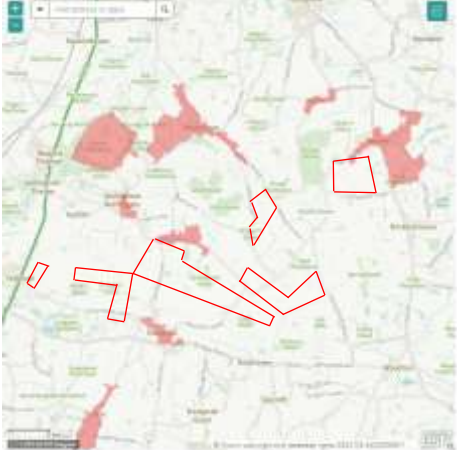
Ecological Designations

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
Site of Special Scientific Interest (SSSI)				ASLACTON PARISH LAND 1067531 approximately 3200m to the north west of Site 1 border. PULHAM MARKET BIG WOOD 1067567 approximately 3100m to the north east of Site 1 border. FRITTON COMMON 1067537 approximately: - 2000m to the south west of Site 2; - 770m to the south of Site 3; - 1450m to the west of Site 4. SHOTESHAM-WOODTON HORNBEAM WOODS 1067758 approximately 570m to the south of Site 7. SHOTESHAM-WOODTON HORNBEAM WOODS 1067757 adjacent to the southern border of Site 6. SHOTESHAM-WOODTON HORNBEAM WOODS 1067756 adjacent to the northern border of Site 6. SHOTESHAM-WOODTON HORNBEAM WOODS 1004534 approximately 200m from western border of Site 8. SHOTESHAM COMMON 1067533 approximately 3000m from north western border of Site 9. HEDENHAM WOOD 1067732 approximately 180m from eastern border of Site 10. TINDALL WOOD, DITCHINGHAM 1067568 approximately 2100m from eastern border of Site 10. SEXTON WOOD 1067324 approximately 1950m from southern border of Site 10.
Special Protection Area (SPA)				BROADLAND UK9009253 approximately 8800m from eastern border of Site 10.

				BROADLAND UK9009253 approximately 7200m from eastern border.
Special Area of Conservation (SAC)				THE BROADS UK0013577 approximately 7200m from most northern border. WAVENEY & LITTLE OUSE VALLEY FENS UK0012882 approximately 13400m from most southern border. BRECKLAND UK0019865 approximately 28500m from most western border of Site. NORFOLK VALLEY FENS UK0012892 approximately 2100m from most western border of the Site.
RSPB Reserve				
RAMSAR Site				BROADLAND UK11010 approximately 9700m from most northern border. REDGRAVE & SOUTH LOPHAM FENS UK11056 approximately 13500m from most southern border. MINSMERE-WALBERSWICK UK11044 approximately 25000m from most eastern border.
Important Bird Area				
National Nature Reserve				
Local Nature Reserve				

Built Heritage Designations

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
Conservation Area				 Site 1: -Pulham Market Conservation Area approximately 2600m to the south east. -Pulham St Mary Conservation Area approximately 4000m to the south east. -Gissing Conservation Area approximately 3000m to the south west. -Forncett St Peter Wacton Conservation Area approximately 3000m to the north.  Sites 2-3-4-5 -Long Stratton Conservation Area approximately 650m from Site 2.

			-Fritton Conservation Area in proximity of south border of Site 3. -Hempnall Conservation Area approximately 400m north of Site 3 and 700m from Site 5.  Sites 6-7-8-9 -Hempnall Conservation Area approximately 900m to the south of Site 6. -Saxlingham Nethergate Conservation Area approximately 3200m to the north of Site 7 and adjacent to Site 6. -Shotesham Conservation Area 2600m to the north of Site 6. -Howe Conservation Area approximately 1270m to the north of Site 9. -Brooke Conservation Area in proximity of north of Site 9. Site 10
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				 -Hedenham Conservation Area approximately 1600m to the south. -Seething Conservation Area approximately 1600m to the north. -Brooke Conservation Area -Bergh Apton Conservation Area approximately 3600m to the north. Source: https://www.southnorfolkandbroadland.gov.uk/conservation-areas-2/conservation-6
Grade I Listed Structure				Site 1 – 1480m away from 1373033 Site 2 – 50m away from 1304267 Site 2 - 533m away from 1373411 Site 2 & 6 – within 1km of 1302231 Site 3 – Near site boundary of 1373281 Site 3, 5 & 6 – Within 1km of 1050328
Grade II* Listed Structure				Site 2 – 60km away from 1373264 Site 6 – List Entry 1152354, 1050665, 1050666, 1050667 within 700m away from site. Site 7 – List Entry 1170906
Grade II Listed				Site 1 • MOULTON FARMHOUSE 1373270 approximately 370m to the north. • BROADGATE WAY 1050318 approximately 350m to the north. • BARN COTTAGES 1050010 approximately 280m to the south.

			• THE LODGE 1301853 604m to the east. Cluster approximately 600m to south: • AYLMER'S HALL WALK FARMHOUSE 1301881. • BECK GREEN FARMHOUSE 1179692 • SCHMETTERLING HOUSE 1050006 • THE VALLEY FARMHOUSE 1050809 • CHESTNUT FARMHOUSE 1050808 • STAR GREEN FARMHOUSE 1050007 • FRIENDS' MEETING HOUSE 1179618 • PRANGLE FARMHOUSE 1050008 Site 2 THE HOLLIES 1373282 approximately 230m to the east. Cluster of Listed Buildings found within Stratton St Michael: • CHURCH FARMHOUSE 1153545 approximately 76m to the south. • BARN NORTH OF THE OLD RECTORY 1050306 approximately 76m to the south. • COTTAGE OCCUPIED BY MR AND MRS WOODS, NORTH-WEST OF CHURCH OF ST MICHAEL 1050305 adjacent to south boundary
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			• PAIR OF HOUSES OWNED BY MR B R WEEDEN 1153535 approximately 170m to south • COTTAGE OCCUPIED BY MRS RYE 1050315 approximately 170m to south • THE RED COTTAGE 1153675 approximately 200m to south. • THE CEDARS 1304177 approximately 70m to south Cluster of Listed Buildings found within Tharston (approximately 700m to the west): • BODEN HOUSE 1302085 • PICTON FARMHOUSE 1302032 • The Old Rectory 1050020 • CHURCH FARM COTTAGE CHURCH FARMHOUSE 1179208 • WILLOW FARMHOUSE 1179328 • CASA MIA 1373374 • HAWTHORN HOUSE 1179322 • THE LAURELS 1050026 Cluster of Listed Buildings within Low Tharston (approximately 1280m to the north west): • LIME KILN 1179216 • VITTORIA 1050025 • MONUMENT ON CHAPEL HILL 1050018 Site 3
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			Cluster of Listed Buildings to south of site in Morningthorpe: BARN ADJOINING WEST OF THE RECTORY 1050258 approximately 300m to south THE RECTORY 1373280 approximately 300m to south Cluster of Listed Buildings to the south of Site 3 in Fritton: FRITTON RECTORY 1303982 approximately 56m to south of Site. BARN IMMEDIATELY NORTH-WEST OF CHURCH FARMHOUSE 1050260 approximately 70m to the east. CHURCH FARMHOUSE 1050259 approximately 70m to the east. Cluster of buildings found within Hempnall (approximately 460m to the east of the proposal) DISUSED WINDMILL (NOW PART OF HEMPSTALL MILL CENTRE) 1050338 COTTLESTON 1050337 KRONS MANOR 1373237 Site 6 Cluster of Listed Buildings in Tasburgh approximately 300m from Site 6: • BARN NORTH-WEST OF TASBURGH HOUSE 1050015 • TASBURGH HOUSE 1373406 • THE COUNTRYMAN PUBLIC HOUSE 1373407 • HILL FARMHOUSE 1050016 • NO 1 INCLUDING GARDEN WALL NORTH-EAST AND NORTH-WEST 1050047
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			• MISTLETOE COTTAGE 1050017 (approximately 400m to the north of Site 2). FAIRSTEAD LANE FARMHOUSE 1304377 approximately 300m to the east. GROVE FARMHOUSE 1050330 adjacent to southern boundary. WOOD FARMHOUSE 1373238 approximately 50 from southern border. LIMETREE FARMHOUSE 1304378 approximately 370m to the south. FORMER QUAKER MEETING HOUSE 1178892 approximately 100m to the south. Cluster of buildings within Saxlingham Green, approximately 200m to the north: • HOLLY COTTAGE 1373081 • SAXLINGHAM HALL 1050673 • CANNON COTTAGE AND ADJOINING COTTAGE 1050674 • HALL FARMHOUSE 1152330 • GREEN FARMHOUSE 1304805 • ORCHARD COTTAGE 1373082 • Queen Margaret Cottage 1152339 • MANOR FARMHOUSE BARN 1152344 • MANOR FARMHOUSE 1050675 • Manor Cottage 1373079
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			• Hill Cottages 1373062 • Hill House 1152265 Cluster of Listed Buildings within Saxlingham Nethergate approximately 1200m to the north of Site 6. Site 8 Cluster of Listed Buildings within Shotesham, the nearest are: • OUTHOUSE IMMEDIATELY TO NORTH OF UPGATE GREEN FARMHOUSE 1304804 approximately 200m to the north • UPGATE GREEN FARMHOUSE 1050681 approximately 200m to the north Site 9 Cluster of Listed Buildings with Brooke, the nearest to the site are: • LITTLEBECK FARMHOUSE 1051154 approximately 170m to the south • BARN AT OLDHOUSE FARM 1051155 approximately 200m to the west • OLDHOUSE FARMHOUSE 1372864 approximately 200m to the west • WATERFIELD COTTAGE 1372865 approximately 230m to the north • 66, HIGH GREEN 1051160 approximately 170m to the north • THE WARREN 1051158 approximately 190m to the north. • Cluster of Listed Buildings to the east approximately 1000m away (Six Acre Plantation, Park
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				Plantation and other trees provide suitable buffer between buildings and proposal). • KIRSTEAD HOUSE FARMHOUSE 1170567 approximately 600m to the east (Park Plantation provides buffer) • LITTLEBECK FARMHOUSE 1051154 200m to the south (it does present screening) Site 10 • Cluster of Buildings to the west approximately 360m away: • BEULAH BARN 1305841 • BEULAH HOUSE 1051115 • MANOR FARMHOUSE 1051114 • OLD RECTORY 1051116 • WOODTON LODGE 1305739 approximately 460m to the south west • Cluster of Listed Buildings approximately 840m to the south west, the nearest ones: • HILL FARMHOUSE 1050590 • HILL HOUSE 1153556 • WOOD FARMHOUSE 1373120 • Cluster of Listed Buildings within Thwaite St Mary: • WHITE HOUSE FARMHOUSE • Camp in Village 1003984 approximately 1000m from north west border of Site 6 • Castle Hill, Hangman's Hill and adjoining earthworks, Darrow Green 1003994 approximately 2000m from southern border of Site 2
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				Moated site, Hales Hall 1003754 approximately 5600m from north east border of Site 10.
Scheduled Monuments (SAM)				Newton Flotman Bridge 1002885 approximately 2000m from north west border of Site 6. Camp in Village 1003984 approximately 1000m from western border of Site 6. Castle Hill, Hangman's Hill and adjoining earthworks, Darrow Green 1003994 approximately 2050m to south east of Site 4.
Registered Park / Garden				Rainthorpe Hall approximately 1500m to the north western border of Site 6. Ditchingham Hall approximately 2000m from the southern eastern border of Site 10. Langley Park approximately 4600m to the north east
Entrust Professional Services Limited always recommends that an Archaeological Survey is undertaken at an early stage to establish whether the viability of the proposed development could be compromised.				

Residential Amenity

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
Financially Involved Dwelling				It is unlikely that any dwellings will be immediately affected by the proposed development, however this should be investigated further.
Non-Financially Involved Dwellings				It is unlikely that any dwellings will be immediately affected by the proposed development, however this should be investigated further.

Flood Risk

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	

Within Identified
Flood Zone?

As is visible from the maps, apart from Site 8, all sites are within Flood Zone 1. Site 8 only has a minor part in Flood Zone 2 and 3. As all the sites are over 1ha, a FRA will be required in any case.

Flood Zone Maps



Figure 1: Flood Zone 1 (Site 1)



Figure 2: Flood Zone 1 (Site 2)



Figure 3: Flood Zone 1 (Site 3)

Figure 6: Flood Zone 1 (Site 6)

A map of the Brookwood area in Surrey, showing the proposed Brookwood North site highlighted in pink. The map includes labels for 'Brooke Wood', 'Park Bungalow', 'Littlebeck Farm', 'Hightfield Farm', 'Old House Farm', and 'Brooke'. A legend in the bottom left corner shows 'Brookwood North' in pink and 'Brookwood South' in green.

Figure 9: Flood Zone 1 (Site 9)



Figure 10: Flood Zone 1 (Site 10)

Public Rights of Way (PROW)

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
Public Right of Way				Site 1: PROW along perimeter of Site. PROW also found within site boundary. Site 2: PROW crossing the eastern portion of the site. It is likely to require additional screening. Site 3: PROW crossing the eastern portion of the site. It is likely to require additional screening. Site 4: PROW crossing the northern portion of the site. It is likely to require additional screening. Site 5: PROW not found within site boundary, however there are some in vicinity of the red line boundary. Site 6: PROW found along the site boundary. A few cross the site, however due to the large area of the site this should not compromise the proposal. Site 7: PROW found along Site boundary. Site 8: 2 PROW found crossing the site, they are likely to require additional screening. Site 9: 1no. PROW crossing the middle of the Site, which may require additional screening. Site 10: 2no. PROW found along Site boundary. 1no. PROW along southern boundary has screening (mature trees and hedgerows). 1no PROW to the north will require additional screening.
Open Access Land				

Landscape Designations

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
National Park				
Green Belt				
Country Park				
Area of Outstanding Natural Beauty				
Ancient Woodland				Site 4 Spring Wood Ancient Replanted Woodland outside the red line boundary, in between the two sections. Site 6 Popes Wood Ancient Replanted Woodland adjacent to part of the southern border. Doylys Grove Ancient Replanted Woodland adjacent part of the southern border. Saxlingham Grove Ancient and Semi-Natural Woodland adjacent northern border. Little Wood Ancient and Semi-Natural Woodland adjacent southern border. Site 7 Winters Grove Ancient and Semi-Natural Woodland 600m from southern border. Becketts Wood Ancient and Semi-Natural Woodland 600m to south east of southern border.

			Privet Wood Ancient and Semi-Natural Woodland 700m to south east of southern border. Ancient & Semi-Natural Woodland 800m to east of border. Site 8 Ringers Grove Ancient and Semi-Natural Woodland adjacent to western border. Little Wood Ancient and Semi-Natural Woodland approximately 600m to west of border. Great Wood Ancient Replanted Woodland approximately 700m to the west. Green Farm Grove Ancient and Semi-Natural Woodland approximately 200m to the east of the site boundary. Site 9 Brooke Wood Ancient Replanted Woodland 200m to the west of the boundary. Howe Grove Ancient Replanted Woodland 1117292 1800m to the north west of the site. Site 10 Hedenham Wood approximately 170m to the east of the site boundary. Long Row approximately 1000m to the east of the site boundary. Tindall Wood approximately 3600m to the east of the site boundary.
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Agricultural Land Classification (England Only)

Designation	Presence of Constraint			Comments
	Yes	Investigate	No	
Grade 3 or Higher				Site 1: Grade 3 Site 2: Grade 3 Site 3: Grade 3 Site 4: Grade 4 and Grade 3 Site 5: Grade 3 Site 6: Grade 3 Site 7: Grade 3. Site 8: Grade 3, northern slither of land is Grade 2. Site 9: Grade 3 Site 10: Grade 3. Eastern portion is Grade 4.

Recommendations

Constraint Type	R A G	Comments
Ecological Designations		There are mapped ecological constraints found outside of the Site boundary. SSSI are adjacent to Site 6 in some areas of the red line boundary, other SSSI are in close proximity to the Site boundary (such as Site 7, Site 8 and Site 10). As the proposal consists of a solar scheme with a footprint of over 0.5ha and falls within SSSI Impact Risk Zones, the impact on the SSSIs/SACs/ SPAs and Ramsar sites will need to be assessed. The LPA will therefore likely need to consult with Natural England on the impact of the proposal.
Built Heritage Designations		There are many mapped heritage assets in proximity of the Sites. It will be necessary to conduct a site walkaround to determine the impact the proposal will have on the Listed Buildings and Conservation Areas in proximity of the Site boundary. It is advisable to undertake an archaeological survey and to consult with the Council's heritage officer at a planning pre-application stage. Photomontages are also recommended to demonstrate the level of impact from Listed Properties, Conservation Areas and SAMs. Site 1: There are Listed Buildings in proximity of the boundary of the site, which could be impacted by the proposal. Additional screening may be required to screen the proposal and avoid impact to the visual amenity. Site 2: Additional screening is likely to be required due to the proximity to Listed Properties along the boundary, such as those found in Stratton St Michael. Site 3: Additional screening is likely to be required due to the proximity to Listed Properties along the boundary, such as those found in Fritton to the south east of Site boundary, and those found in Hempnall to the north east. Site 4: There are Listed Buildings to the north of the Site adjacent to the boundary which may require additional screening. The eastern section has Ancient Woodland providing screening against the Listed Buildings, which is beneficial for the proposal. Site 5: There are heritage assets to the south in proximity to the boundary which do present buffers such as trees between them and the red line boundary, however additional screening may be required. Site 6: Due to the large area of this site additional screening will be required. There are some Listed Buildings in proximity of the Site boundary.

		Site 7: At a distance away from any Heritage assets, apart from one Grade II* Listed Building 180m to the east. The northern portion of the site is approximately 3200m from Saxlingham Nethergate Conservation Area, therefore it is unlikely that it will impact any heritage assets. Site 8: Due to the Listed Buildings located around 200m to the north from the boundary, additional screening may be required. Site 9: Due to the boundary's proximity to Brooke Conservation Area, additional screening is highly recommended as the field does not present hedgerows/trees. The site benefits from Ancient Woodland to the west providing screening against the Heritage Assets found further west. Site 10: There are blocks of woodland which provide some screening for Hedenham Conservation Area to the south, however additional screening may still be required.
Residential Amenity		There are a small number of residential dwellings adjacent and outside of the site boundary, which may require additional screening. There are residential dwellings which are situated within the villages found in between the various sites in proximity of the sites may be impacted by the proposal, additional screening is therefore recommended. Siting of equipment and sufficient screening / mitigation measures should be implemented. Pre-consultation engagement with a Planning Officer is recommended.
Flood Risk		The majority of the Sites are in Flood Zone 1, apart from a small portion of Site 8 being in Flood Zone 3. It is essential that a flood risk assessment is undertaken and that discussions with the Council's hydrologist and planning officer take place to see whether the proposed development is viable and to agree any mitigation if required.
Public Rights of Way		There are footpaths in and around the site according to the Council's PRoW map. The fields of the various Sites do present screening in certain areas thanks to trees and hedgerows, however additional screening may be required along some PROW and roads. Some roads present high hedgerows, such as within Site 2; Norwich Road has a high hedgerow. Others however present less or no screening and therefore may require additional planting.
Landscape Designations		There are no mapped Landscape Designations within the site boundary. There are patches of Ancient Woodland outside of the site boundaries which will provide screening from certain directions. They are unlikely to be impacted by the proposal. It may be useful to confirm this within a planning pre-application submission.

Agricultural Land Classification		All of the sites have Grade 3 or Grade 4 soil, apart from Site 8, which presents Grade 2 in the northern portion. On-site soil tests are recommended.
Further Information		For Solar PV proposals, Entrust recommends that a Glint and Glare Assessment is undertaken prior to any planning submissions to ensure the design will not adversely affect any neighbouring property or transport routes.

National Policy

All the text has been taken from the National Planning Policy Framework (NPPF) (Ministry of Housing and Local Government, 2021)

Constraint Type	Comments
Flood Risk	ESSENTIAL INFRASTRUCTURE • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood. • Wind turbines and solar farms are identified as essential infrastructure.
Public Rights of Way	Paragraph 100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Upcoming National Law

Constraint Type	Comments
Biodiversity Net Gain	"Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before – protecting existing habitats and ensuring that any impacts on biodiversity are compensated for with natural habitat and ecological features over and above what is affected." (UK Government, 2022) "Developments will have to be delivered in a way which helps to reduce and restore any biodiversity loss during the building phase, and crucially also deliver a 10% boost to the area's biodiversity. It will help deliver thriving natural spaces for local communities and is a key plank of the Government's plans to build back better from the pandemic and to help level up all parts of the country." (UK Government, 2022).

Local Policy

All text has been taken from South Norfolk Council, Draft Plan.

Constraint Type	Comments
Ecological Designations	Policy 1: Addressing climate change and protecting environmental assets To address climate change and promote sustainability, all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather. Development will therefore: • improve the resilience of ecosystems to environmental change The environmental assets of the area will be protected, maintained, restored and enhanced and the benefits for residents and visitors improved. Development and investment will seek to expand and link valuable open space and areas of biodiversity importance to create green networks. Where there is no conflict with biodiversity objectives, the quiet enjoyment and use of the natural environment will be encouraged and all proposals should seek to increase public access to the countryside. All new developments will ensure that there will be no adverse impacts on European and Ramsar designated sites and no adverse impacts on European protected species in the area and beyond including by storm water runoff, water abstraction, or sewage discharge. They will provide for sufficient and appropriate local green infrastructure to minimise visitor pressures. Development likely to have any adverse affect on nationally designated sites and species will be assessed in accordance with national policy and legislation. In areas not protected through international or national designations, development will: • minimise fragmentation of habitats and seek to conserve and enhance existing environmental assets of acknowledged regional or local importance. Where harm is unavoidable, it will provide for appropriate mitigation or replacement with the objective of achieving a longterm maintenance or enhancement of the local biodiversity baseline • contribute to providing a multifunctional green infrastructure network, including provision of areas of open space, wildlife resources and links between them, both off site and as an integral part of the development • help to make provision for the longterm maintenance of the green infrastructure network • protect mineral and other natural resources identified through the Norfolk Minerals and Waste Development Framework.
Built Heritage Designations	Policy 1: Addressing climate change and protecting environmental assets The built environment, heritage assets, and the wider historic environment will be conserved and enhanced through the protection of buildings and structures which contribute to their surroundings, the protection of their settings, the encouragement of

	high-quality maintenance and repair and the enhancement of public spaces.
Design	Policy 2: Promoting good design All development will be designed to the highest possible standards, creating a strong sense of place. In particular development proposals will respect local distinctiveness including as appropriate: • the historic hierarchy of the city, towns and villages, maintaining important strategic gaps • the landscape setting of settlements including the urban/rural transition and the treatment of 'gateways' • the landscape character and historic environment, taking account of conservation area appraisals and including the wider countryside and the Broads area • townscape, including the city and the varied character of our market towns and villages • provision of landscaping and public art • the need to ensure cycling and walking friendly neighbourhoods by applying highway design principles that do not prioritise the movement function of streets at the expense of quality of place • the need to increase the use of public transport, including through 'public transport oriented design' for larger development • designing out crime • the use of sustainable and traditional materials • the need to design development to avoid harmful impacts on key environmental assets and, in particular SACs, SPAs and Ramsar sites This will be achieved by ensuring that: • major development areas providing over 500 dwellings or 50,000m² of non residential floorspace, and areas of particular complexity will be masterplanned using an inclusive, recognised process demonstrating how the whole scheme will be provided and ensuring that it is well related to adjacent development and infrastructure • all residential development of 10 units or more will be evaluated against the Building for Life criteria published by CABI (or any successor to this standard), achieving at least 14 points (silver standard) • Design and Access Statements for non residential development will show how the development will meet similar high standards
Flood Risk	Policy 1: Addressing climate change and protecting environmental assets To address climate change and promote sustainability, all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather. Development will therefore: • be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage • minimise water use and protect groundwater sources
Public Rights of Way	Policy 1: Addressing climate change and protecting environmental assets Development and investment will seek to expand and link valuable open space and areas of biodiversity importance to create green networks. Where there is no conflict with biodiversity objectives, the

	quiet enjoyment and use of the natural environment will be encouraged and all proposals should seek to increase public access to the countryside.
Proposal Specific Policy	Policy 3: Energy and water Energy Development in the area will, where possible, aim to minimise reliance on nonrenewable high-carbon energy sources and maximise the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies. To help achieve this: • all development proposals of a minimum of 10 dwellings or 1,000m² of non residential floorspace will be required (a) to include sources of 'decentralised and renewable or low-carbon energy' (as defined in the glossary) providing at least 10% of the scheme's expected energy requirements and (b) to demonstrate through the Design and Access Statement for the scheme whether or not there is viable and practicable scope for exceeding that minimum percentage provision • in addition to the above requirement, detailed proposals for major developments (minimum of 500 dwellings or 50,000m² of non residential floorspace) will be required to demonstrate through the Design and Access Statement that the scheme has seized opportunities to make the most of any available local economies of scale to maximise provision of energy from sources of 'decentralised and renewable or low carbon energy sources' • all development proposals of a minimum of 10 dwellings or 1,000m² of non residential floorspace will be required to demonstrate, through the Design and Access Statement, that all viable and practicable steps have been taken to maximise opportunities for sustainable construction Other Development Plan Documents will allocate land for renewable energy development. Provision will be made for strategic enhancement of the electricity and gas supply networks to support housing and employment growth. This will include major investment in existing electricity substations in central Norwich and to the east of Norwich.

Summary

Summary and Recommendations
To summarise, the Site presents a few constraints, which are not considered to be major issues and are not likely to compromise the proposal, however some sites are more viable than others. Flood risk is not considered to be a major issue with any of the sites, however, it is essential to conduct a Flood Risk Assessment (FRA) as part of the planning application as the areas which are in Zone 1 are over 1ha in size, so an FRA is required in any case. Agricultural Land Classification is not considered to compromise the proposal, as none of the sites have Grade 1 Agricultural Land. Site 8 however does have a northern portion in Grade 2 Agricultural Land, which may mean the development is unviable in that area. Site 4 and Site 10 have Grade 3 and 4 Agricultural Land which is favourable for this proposal. Therefore, Site 8 may not be viable due to its middle portion being in Flood Zone 3, and northern portion being Grade 2 Agricultural Land. The topography of the land is flat consisting of a patchwork of fields interspersed with blocks of woodland. There are villages found in proximity of the sites, which may be visually impacted by the proposal, however most of them do present buffers such as vegetation around them. It is worth noting that adjacent to the north eastern border of Site 2 there is an existing solar farm which demonstrates a propensity in this area towards this kind of development. An issue could be the presence of many Built Heritage assets in proximity of the sites, including Listed Buildings and Conservation Areas found within the villages which may be impacted visually by the proposal. It is therefore important to establish the effect the proposal will have on the different heritage assets, and which already have a degree of screening in place. Therefore, a Heritage Assessment is recommended due to the proximity to Listed Buildings. Additional screening may be required in any case on all Sites, through hedgerows and additional planting. A site walkaround is recommended to establish the impact on the various Sites. The Sites benefit from patches of Ancient Woodland, which offers long term screening, as it is protected. In particular it is worth noting these sites which benefit from Ancient Woodland screening them: -Site 4 presents Ancient Woodland in between the two sections. -Site 8 and Site 9 have Ancient Woodland to the west. A few sites present PROW which are found on the boundary lines and inside the red line boundary. These will need to be considered in the design of the proposal and screened via hedgerows. This could lead to some sites being unviable as they are reduced in size, as may be the case for the west section of Site 1. However, it is not likely to compromise other sites particularly.

Photomontages and landscaping schemes should be undertaken once the scope of the development has been confirmed with the LPA by way of a pre-application request. A glint and glare assessment is likely to be needed pertaining to local airfields (such as Tibenham Airfield in proximity of Site 1) and transport networks. Hardwick Airfield in proximity of Site 4 appears to be disused however, further investigation is recommended to ensure there are no plans of it reopening.

There are ecological designations however they are located outside of the boundaries and at quite a far distance, it is therefore unlikely that they will be affected. It is suggested to also undertake an Archaeological Assessment, a Phase I Ecological Assessment and produce photomontages from nearby sensitive receptors, such as Listed Buildings, dwellings and PRow.

It is also advisable to request pre-application feedback from South Norfolk Council to gather planning input on the scheme. The layout should be careful to avoid visual impact on nearby dwellings and heritage assets, identified along the perimeter of the Site and in the various villages.

Biodiversity enhancement measures should also be incorporated into the design wherever possible. This could also be implemented when screening the PRow and residential dwellings with vegetation. This should be considered in the financial assessment of the viability of the scheme as from 12th February 2024, it is a requirement for all developments in England to enhance biodiversity by at least 10% from the current baseline for at least 30 years of the duration of the operation of the site.

The requirement for net-biodiversity gain is a requirement of Local Planning Authorities and this should be discussed at pre-application discussions or at least in the planning application. Discussions with the LPA are strongly recommended.