



East Pye Solar
Written Summary of the Oral Submissions at the
Open Floor Hearing 1 and the Applicant's
Responses

Revision 1

October 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/9.18

The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8 (1) (c)

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides East Pye Solar Limited's (the 'Applicant's') response to oral submissions made at Open Floor Hearing 1 (OFH1), held on 15 September 2026 at Dunston Hall, Norwich, and virtually via Microsoft Teams. OFH1 provided registered Interested Parties (IPs) and local residents with the opportunity to make oral representations. Each IP making an oral submission was requested to provide a written summary to the Examining Authority (ExA) for Deadline 1 (DL1) (6 October 2026).
- 1.1.2 This document sets out the Applicant's response to comments made at OFH1, grouped by speaker. Where multiple representations cover the same topic, a detailed response is provided only for the first occurrence, with relevant application documentation identified. This document also summarises the oral submissions made on behalf of the Applicant at OFH1.
- 1.1.3 References to the application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's East Pye Solar Examination Library.

1.2 Summary of the Applicant's Oral Submissions at OFH1

- 1.2.1 Toby Yeates, Associate at Pinsent Masons LLP, on behalf of the Applicant, thanked the IPs for attending and for their representations, recognising the commitment and personal matters involved in making oral submissions.
- 1.2.2 Mr Yeates confirmed that all matters raised will be responded to in the Applicant's written submissions and, where relevant, at future hearings including Issue Specific Hearing 1.
- 1.2.3 Mr Yeates confirmed that no part of the registered title of the War Memorial or the Old Rectory at Saxlingham Nethergate falls within the Order limits, and that no compulsory acquisition or acquisition of rights is sought over either property.
- 1.2.4 Mr Yeates also emphasised that the Applicant is not seeking to acquire any residential properties. He explained that residents may have received communications referring to compulsory acquisition because the Applicant's land agents, Dalcour Maclaren, served legal notices on behalf of the Applicant on owners of land or property over which other powers may be sought, for example rights for a cable route, as recorded in the **Book of Reference [APP-022]**. Voluntary negotiations are ongoing with each affected landowner as a

fallback to compulsory acquisition. This is explained in more detail in the **Statement of Reasons [APP-020]**.

- 1.2.5 Mr Yeates stated that, with the exception of consultation (which has been addressed through the acceptance of the application for Examination), the Applicant will continue to engage with and address each substantive issue raised across Examination.

2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 1 and the Applicant's Responses

Table 2.1 Adrian Ramsay MP

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Waveney Valley constituents				
AR-001	General Matters	Opportunity to be heard	Adrian Ramsay, Member of Parliament for Waveney Valley, stated that he supports renewable energy and reaching net zero, but that this must be achieved with community support and minimum disruption to the countryside. He noted that Sites 1 and 2, near Great Moulton, fall within his constituency. Mr Ramsay raised concerns that some people wishing to speak at or attend the hearing had been unable to do so. The ExA confirmed that the case team had worked to ensure all those wishing to speak could do so, either at OFH1 or at Open Floor Hearing 2 (OFH2).	The Applicant notes this comment. Further detailed responses are provided within comment IDs AR-002 to AR-008.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
AR-002	Soils and Agricultural Land	Loss of BMV land and food security	Mr Ramsay stated that high grade agricultural land should be protected for food security, noting that a large proportion of the land within the Order limits is Grade 2 and Grade 3a, and asked the ExA to analyse the land type and whether development here is in the national interest.	The land quality of the land within the Order Limits is set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] and ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]. Chapter 15 sets out an assessment of the likely significant effects on land quality. Chapter 15 includes an assessment of the policy, national and local implications for food production and food security (for which there is no policy). Government's position is that the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly. This will all need to be considered by the ExA.
AR-003	General Matters	Ownership and compulsory acquisition	Mr Ramsay noted that Island Green Power is owned by Macquarie Asset Management, an Australian asset management company, and raised concerns that farmland in South Norfolk could be permanently acquired by foreign investors with no interest in the local community or sustainable farming.	The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs. The Funding Statement [APP-021] provides details of the corporate structure of the Applicant, East Pye Solar Limited, and how the Scheme is being funded.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant, East Pye Solar Limited, is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure schemes and helps fund the transition to clean energy at the scale required. The Applicant has sought voluntary agreements to lease the land required to deliver the Scheme and as such is not seeking to permanently acquire land to deliver the Scheme.
AR-004	Transport and Access	Narrow lanes	Mr Ramsay noted that Great Moulton is recorded in the Domesday Book and stated that Hundred Lane is culturally significant and should not be crossed by heavy vehicles. Likewise, Mr Ramsay stated that single-track roads, such as Lodge Road in Tivetshall St Margaret, are not suitable for the Heavy Goods Vehicles (HGVs) associated with the Scheme.	The Applicant acknowledges the concerns raised regarding Hundred Lane, Lodge Road and other local roads by construction traffic. Access across Hundred Lane is required to allow vehicles to reach Sub-Site 1B and the National Grid substation. Lodge Road is identified as a construction access route to reach access A06. A06 is a contingency access for works to CRC2. The priority would be to use access A02 on B1134. Subject to detailed design and the final sequencing of works in the BESS site and 1B it was considered prudent to provide an alternative option. The use of A06 and Lodge Road is subject to further dialogue with NCC.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The effects of construction traffic on the local highway network have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177] . Construction traffic would be managed in accordance with the Outline Construction Traffic Management Plan [APP-201] , which includes traffic management and mitigation measures intended to minimise impacts on local roads and other users of the highway network.
AR-006	Battery Safety	Emergency access to the BESS	Mr Ramsay asked the ExA to assess whether locations accessed by narrow lanes are suitable for a Battery Energy Storage System (BESS) and substations, raising concerns that the fire service may be unable to reach the site in an emergency.	The Applicant acknowledges the concerns raised regarding emergency access to the proposed BESS. Vehicle tracking has been undertaken which demonstrates that a fire appliance can access the BESS in the event of an emergency. This assessment informed the design of the site access and internal road layout to ensure emergency vehicles can access the site if required.
AR-007	Water Environment	Private water supplies	Mr Ramsay stated that a number of residents take their drinking water from wells and that the aquifer must be kept clean and full.	The mitigation measures set out in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] and secured through the Outline CEMP [APP-196] , Outline OEMP [APP-197] and Outline DEMP [APP-198] demonstrate there will be no detrimental impact

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in water quality, and the scheme will not impact on water quantity as it will mimic existing natural drainage arrangements.
AR-008	Aviation	Tibenham Airfield	Mr Ramsay raised two concerns regarding gliders using Tibenham Airfield: the removal of emergency landing areas in the event of engine failure after take-off; and glint and glare from panels limiting pilots' ability to see other aircraft. He confirmed he would share information received from Tibenham Airfield.	The Applicant has assessed the impacts upon Engine Failure After Take-Off (EFATO) and Glider Launch Failure (GLF), thermal updrafts, and wind shear, and turbulence specifically for Tibenham Airfield (High Level Investigative Report [APP-222]). In addition to applicable guidance set out by the Combined Aerodrome Safeguarding Team (CAST) Advice Note 5, the Applicant has undertaken consultation with Norfolk Gliding Club, who operate at Tibenham Airfield, to inform the operational sensitivity to determine the impact upon the concerns listed. The assessment concludes that no significant effect are predicted due to: • The Scheme not significantly reducing the available space for an emergency landing following EFATO and GLF • The weak nature of thermals as a result of wasted energy from solar panels, and the expected vertical separation between pilots in vicinity of the Scheme and the solar panels • The vertical distance between the Scheme and Tibenham Airfield. Given that at its

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				closest, the Scheme measures 1.5km from threshold 26, the Applicant has assessed a conservative distance of 2km. This is considered conservative as a pilot would need to achieve a climb ratio of 1:16.4 to reach a height of 300ft within a 1.5km (4921.3ft) lateral distance. Given that there are existing roads and dwellings between Tibenham Airfield and the Scheme, it would not be appropriate for a pilot to fly a 1:16.4 climb ratio.

Table 2.2 Cllr Kabeer Kher

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Norfolk County Council (NCC)				
KK-001	General Matters	Norfolk County Council position	Cllr Kabeer Kher, Cabinet Member for Business, Skills and Agriculture, spoke on behalf of NCC in its roles as local highway authority and lead local flood authority. Cllr Kher stated that NCC objects to the Scheme due to the loss of high quality agricultural land, cumulative impacts and unresolved issues, but will continue to engage constructively with the Applicant throughout the Examination.	The Applicant notes this comment.
KK-002	General Matters	Scale and duration	Cllr Kher noted the size of the Scheme and that the operational period of 60 years is not "temporary" as understood by residents or farming businesses.	The temporal scope of the assessment is set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038] , which identifies reversible long-term effects which endure throughout the 60 year operational lifetime of the Scheme, but which cease once the Scheme has been decommissioned, and permanent effects which cannot be reversed following decommissioning.
KK-003	Soils and Agricultural Land	Loss of BMV land	Cllr Kher noted that the Applicant's own figures identify 68% of the site as Best and Most Versatile (BMV) agricultural land, and stated that the loss of this	The land quality of the land within the Order Limits is set out in ES Volume 1, Chapter 15 [APP-051] and the Agricultural Land Classification [APP-182] . Chapter 15 sets out

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			productive farmland should carry substantial weight given its implications for food production, agricultural resilience and farming businesses.	an assessment of the likely significant effects on land quality. Chapter 15 includes an assessment of the policy, national and local implications for food production and food security (for which there is no policy). Government's position is that the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly. This will all need to be considered by the ExA.
KK-004	Cumulative Effects	Other solar schemes and NSIPs	Cllr Kher referred to other Nationally Significant Infrastructure Projects (NSIPs) affecting South Norfolk and asked that cumulative effects on residents and businesses receive consideration.	Cumulative schemes were identified and assessed in ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116] . The Applicant continues to discuss the list of cumulative schemes with the host local authorities as the examination progresses.
KK-005	Alternatives and Energy Need	National Grid substation location	Cllr Kher stated that the chosen National Grid substation location at Great Moulton would bring a substantial new substation and up to four pylons closer to the village, and that NCC had previously supported a more southerly option consolidating infrastructure further from residents.	The Applicant refers to response NCC-004 within The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008] which responds to NCC's concerns on the National Grid Substation location.
KK-006	Transport and Access	Construction traffic strategy	Cllr Kher stated that NCC cannot support the current construction traffic strategy for Sites 7 and 10 because	The Applicant notes the comments regarding Sites 7 and 10 and the ongoing dialogue with Norfolk County Council.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
		for Sites 7 and 10	significant highway constraints and mitigation requirements remain unresolved, and that construction traffic should use roads capable of accommodating it safely and, wherever possible, internal haul routes and cable corridors. In response to a question from the ExA, Cllr Kher confirmed that the highway authority remains in active dialogue with the Applicant regarding Sites 7 and 10.	The Applicant will continue to engage with Norfolk County Council regarding the proposed construction traffic strategy for these sites.
KK-007	Water Environment	Surface water and flood risk	Cllr Kher stated that NCC remains concerned that the application does not yet demonstrate through clear and consistent evidence that surface water can be managed without increasing flood risk. In response to a question from the ExA, Cllr Kher confirmed that NCC officers are in active dialogue with the Applicant on this matter.	Flood (from all sources) and surface water risk has been considered in ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and AS-019], which identifies areas at risk of flooding, taking into consideration climate change. The water environment is also assessed in ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] and ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]. An outline drainage strategy has also been developed in ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and AS-019]. Requirement 11 of the Draft DCO [AS-

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				032] requires written details of the surface water drainage scheme to be submitted to and approved by the relevant planning authority. Further design commitments and mitigation measures for flood risk and drainage are set out in the Design Principles, Parameters and Commitments [APP-213], the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032].
KK-008	General Matters	Landscape, PRow and mitigation	Cllr Kher raised concerns about longer-term effects on landscape character, Public Rights of Way (PRow) and community wellbeing, and asked the ExA to ensure that mitigation or compensation measures are clear, enforceable and effective.	The Applicant acknowledges the concerns raised regarding Public Rights of Way and community wellbeing and notes the importance of ensuring that mitigation measures are clear, effective and deliverable. In relation to transport matters, the effects of the Scheme on Public Rights of Way have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. An Outline PRowPPMP [APP-203] has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The final PRowPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme. The Scheme's effects on landscape character and visual amenity are assessed during the construction phase, Operational Year 1, Operational Year 15, and the decommissioning phase in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032].

Table 2.3 Cllr Daniel Elmer

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of South Norfolk Council (SNDC)				
DE-001	General Matters	Scale, location and cumulative impact	Daniel Elmer, Leader of South Norfolk District Council (SNDC), remains strongly opposed to the Scheme due to its scale, location and cumulative impact. He echoed NCC's concerns regarding agricultural land.	The Applicant's notes this comment.
DE-002	Cumulative Effects	Existing energy infrastructure	Mr Elmer stated that South Norfolk already makes a significant contribution to nationally important energy infrastructure, including multiple solar and battery storage schemes. Mr Elmer encouraged the ExA to visit the areas around Dunston Hall and Norwich Main to observe the cumulative pressures already being experienced.	The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at Deadline 1. This has considered all requests for site visits and set out a rationale behind their inclusion or exclusion.
DE-003	Cultural Heritage	Setting of heritage assets	Mr Elmer stated that the Scheme would fundamentally alter the settings of historic buildings and landscapes, including listed buildings such as Moulton Farmhouse and Hillside House, and that proposed woodland planting may be inconsistent with the historic landscape character.	The Applicant acknowledges the comments and would like to refer to its response to South Norfolk District Council [RR-1795] in The Applicant's Response to Relevant Representations - Part 1 [PDA-008] under comment ID SNC-007.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
DE-004	Landscape and Visual	Landscape character and fencing	Mr Elmer raised concerns that the Tas and Great Moulton Plateau landscapes would be subject to an unprecedented amount of industrial-scale infrastructure, and objected in particular to the proposed close-boarded fencing as wholly out of character with the rural environment.	The Applicant acknowledges the respondent's concerns regarding the introduction of new infrastructure within the Tas Tributary Farmland and Great Moulton Plateau Farmland landscapes, and the potential effects on rural character and visual amenity. The likely effects of the Scheme on landscape character and visual amenity, including effects on the Tas Tributary Farmland and Great Moulton Plateau Farmland Landscape Character Areas, are assessed in Chapter 7, Landscape and Visual [APP-043]. The design approach seeks to utilise and reinforce existing landscape features, including hedgerows, tree belts and woodland, together with the provision of additional planting where appropriate, to assist with landscape integration and the reduction of visual effects. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensated for, through the design process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				DEMP [APP-198] and Outline LEMP [APP-199].
DE-005	Ecology and Biodiversity	Trees, BNG and protected species	Mr Elmer raised concerns about impacts on ancient trees and hedgerows, stating that insufficient certainty has been provided on their long-term protection, and on delivery, monitoring and maintenance for Biodiversity Net Gain (BNG). He raised further concerns about protected species, including barbastelle bats and white-clawed crayfish, and called for stronger safeguards and robust long-term monitoring.	The Applicant commits to no loss or deterioration of ancient or veteran trees and hedgerows. The ancient trees and hedgerows will be protected by the minimum offset distances set out in the Design Principles, Parameters and Commitments [APP-213]. Measures detailed within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEM [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] are designed with the objective of securing the relevant ecological mitigation. These documents also set out monitoring and reporting arrangements to ensure mitigation measures remain effective. The Green Infrastructure Strategy [AS-005] demonstrates the proposed landscape and ecological measures, with the prescriptions, management and monitoring of ecological measures set out in the Outline LEMP [APP-199] For White Clawed Crayfish, The Applicant notes the Examining Authority's (ExA) request, in the Rule 6 letter [PD-005]. The

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant has provided an update on this at Procedural Deadline A within the Applicants Position on White Clawed Crayfish document [PDA-007]. If in the unlikely event that the species was recorded within watercourses within the Order Limits, adopted precautionary avoidance measures already mitigate impacts upon the species, and as a consequence the impact assessment conclusions would remain unchanged.
DE-006	Noise and Vibration	Operational noise	Mr Elmer stated that there is insufficient reassurance regarding noise from battery storage and other operational equipment.	Assessment of noise and vibration effects are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The Applicant notes the concerns raised regarding substations, transformers and inverters. Noise from these elements of the Scheme have been considered within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. 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:

ID	Theme	Issue	Comments/Issue Raised	Applicant's 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 50d BA. - 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.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The detailed design will therefore be required to achieve the assessed and secured noise limits. The assessment of low frequency sound has been undertaken at receptors closest to the Project Substations, new National Grid Substation and BESS areas. Noise levels at receptors located further away have been reviewed, but impacts have not been reported unless they were determined to have a greater than negligible impact. The assessment has been undertaken at receptors: • NSR2A • NSR2B • NSR3A • NSR3B • NSR21 • NSR29 • NSR44 • NSR77 The assessment results are presented in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. The assessment concludes that low

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				frequency sound levels at the above receptors are below the NNR45 criterion and therefore require no modification to the outcome of significance.

Table 2.4 Sandra Mullett

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Block East Pye Solar (BEPS)				
SM-001	Alternatives and Energy Need	Regional solar targets	Sandra Mullett, a member of BEPS and a Great Moulton resident, objects to the Scheme. Ms Mullett stated that Ofgem's TMO4+ Impact Assessment (April 2025) demonstrated that East Anglia had already exceeded its combined transmission and distribution regional solar targets for 2030 and 2035, and that the Applicant's Statement of Need [APP-206] confirms that the Scheme is not required to meet any identified regional shortfall, and in any case not at the cost of the mental wellbeing of local communities.	The Applicant notes that Ofgem's TMO4+ Impact Assessment was published in (April 2025), which was prior to the completion of NESO's prioritisation and the publication of those results (December 2025). The Applicant refers to its response to representation ID BEPSG-003, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010], which explains that the Scheme is included within the list of schemes which have been prioritised by NESO to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met).
SM-002	Alternatives and Energy Need	Selection of Great Moulton	Ms Mullett asked the ExA to consider why constraints which ruled other locations out were considered acceptable at Site 1. She questioned whether the priority had simply been a willing landowner and proximity to the transmission line, and why a new	As set out in the Site Selection Assessment [APP-215] , Site 1 was not selected on the basis of a willing landowner and proximity to the transmission line alone. A staged, criteria-led approach was followed, having regard to the Horlock Rules, and three alternative Siting Zones along the Bramford to Norwich 400kV

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			National Grid substation was required for this project alone when other projects are awaiting connection to a new substation on the proposed new transmission line.	line were assessed on a RAG basis against environmental, planning and operational constraints. The chosen location within Sub-Site 1B was found to avoid major designated areas of ecological, cultural or heritage value, sits entirely within Flood Zone 1, benefits from suitable access from the Strategic Road Network via the A140 and B1134, and provides opportunities for screening from existing vegetation. The alternative Siting Zones were discounted due to constraints including operational conflict with the railway line, proximity to Norwich Main Substation and other consented/proposed infrastructure, heritage designations, residential proximity, and areas of flood risk and priority habitat. The Applicant refers to its response to representation ID SUC-004, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010], which explains the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Further, due to the urgent need for an unprecedented capacity of new low-carbon generation facilities, any other proposals (such as those

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				"awaiting connection to a new substation on the proposed new transmission line" are needed alongside rather than as an alternative to the Scheme.
SM-003	General Matters	Permanence of grid infrastructure	Ms Mullett stated that if infrastructure is expected to remain beyond year 60, its effects should be assessed as permanent, and asked the Applicant and National Grid to confirm if the proposed substation would be a permanent fixture.	The National Grid Substation has been assessed as permanent infrastructure. The Outline DEMP [APP-198] confirms it would remain in situ following decommissioning of the remainder of the Scheme, and the Planning Statement [APP-209] identifies permanent loss/downgrading of BMV land associated with the National Grid Substation and Grid Connection Infrastructure, resulting in significant (moderate adverse) residual effects.
SM-004	Soils and Agricultural Land	Permanent loss of Grade 2 land	Ms Mullett asked why Grade 2 BMV arable land was selected for permanent transmission infrastructure, contrary to government and Strategic Spatial Energy Plan (SSEP) advice, and whether sufficient weight had been given to its permanent loss.	The land quality of the permanent infrastructure is considered in ES Chapter 15 [APP-051], and losses due to permanent infrastructure and tree planting are qualified and quantified. The location of the fixed infrastructure on Grade 2 land was considered carefully, including the effect on agricultural land quality, and a decision was made based on operational needs and environmental balance. This loss is assessed in the ES Chapter as an adverse effect.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SM-005	Water Environment	Groundwater and private water supplies	Ms Mullett raised concerns about the limitations of the Applicant's water assessments and stated that BEPS had commissioned an independent report from Hannah Fraser Consulting Limited, to be submitted at DL1. She stated that Site 1 lies on a principal aquifer within the catchment of the River Waveney and is surrounded by private water supplies, which should be properly tested before consent is granted.	The mitigation measures set out in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] and secured through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] demonstrate there will be no detrimental impact in water quality, and the scheme will not impact on water quantity as it will mimic existing natural drainage arrangements.
SM-006	Cumulative Effects	Combined effects at Site 1	Ms Mullett stated that the Applicant's assessments are dispersed across numerous documents and that the combined effects at Site 1, including construction traffic, abnormal loads and PRow, have not been brought together.	All topics chapters within the Environmental Statement consider the project as a whole, as defined in ES Volume 1 Chapter 4 – The Scheme [APP-040] . The in-combination effects between the significant effects identified in individual topic chapters in ES Volume 1 Chapter 19 – In-Combination Effects Assessment [APP-055] . As such, interactions such as effects on construction traffic, abnormal loads and PRow have been considered.

Table 2.5 David Hook

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Hempnall Parish Council				
DH-001	Landscape and Visual	Extent of development around Hempnall	David Hook, Chair of Hempnall Parish Council and a trustee of CPRE Norfolk, stated that Dunston Hall would be negatively affected by cumulative industrialisation. Mr Hook stated that Hempnall would be surrounded by Site 7 to the north, Site 3 to the south, Site 5 to the west and Site 10 to the east.	The Applicant acknowledges that there will be some significant landscape and visual effects as a result of the Scheme, as presented in Section 7.8 of ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The Applicant does not agree that the Scheme would result in industrialisation of a rural landscape area around Hempnall. While the Scheme would introduce solar infrastructure into a predominantly agricultural landscape, the Site would remain largely undeveloped in character, with the majority of land retained as open grassland and available for continued agricultural management, including grazing. Unlike conventional industrial development, the solar arrays are lower in height, non-permanent, and do not involve extensive built form, large buildings, or significant areas of hardstanding. A Green Infrastructure Strategy [AS-005] has been developed which strengthening / reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and the Outline DEMP [APP-198] respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
DH-002	Land and Rights	Letters to residents	Mr Hook stated that many residents had received letters stating that their land may be required and referring to compulsory purchase powers, causing real concern and affecting wellbeing. He stated that when the Parish Council sought clarification,	The Applicant does not intend to seek compulsory acquisition powers for any homes, gardens and buildings and this has never formed part of the proposal. The scope of the powers sought on the Land Plan [APP-006] shows that powers for compulsorily acquiring land or rights do not extend to such matters. In

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the reply did not give a firm assurance that the property would not be required in future.	addition, Article 31(2) makes it expressly clear that the general power of temporary possession under the Draft DCO [AS-032] does not authorise the undertaker to take temporary possession of any house or garden belonging to a house; or any building (other than a house) if it is for the time being occupied.
DH-003	Planning Process	Community opposition	Mr Hook mentioned that two public meetings had been held in Hempnall, each attended by over 200 people, and that only one person had spoken in favour of the Scheme across both meetings.	The Applicant notes this comment.
DH-004	Alternatives and Energy Need	Rooftop solar potential	Mr Hook referred to research by the UCL Energy Institute for CPRE showing that 117GW of solar could be delivered on roofs and artificial surfaces by 2050, exceeding the 85GW recommended by the Climate Change Committee, and that the Government's statement that solar would cover only 0.4% of land does not reflect the local position.	The Applicant refers to its response to representation ID CJC-014, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] , which explains that large-scale solar schemes are required to achieve net zero and that smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, larger-scale solar schemes.
DH-005	Socio-Economics	Tourism	Mr Hook stated that tourism contributes £3 billion to the Norfolk economy, more than agriculture, and	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] provides an assessment on local tourism assets.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that the Scheme, together with other renewable schemes, would make the area unattractive to visitors.	The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry. The Applicant does not therefore consider that the Scheme would make the area unattractive to visitors. The Applicant recognises the importance of Norfolk's visitor economy, but notes that the £3 billion figure (which we understand to be based on a 2024 economic impact report using

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the Cambridge Model) relates to expenditure rather than GVA and extends well beyond the vicinity of the Scheme. Chapter 14 includes analysis on the size of the tourism industry in South Norfolk and finds that: • In 2024, 2,580 people were employed in the tourism industry. At 4.2% of total employment, this is lower than Norfolk (6.1%). In the local area surrounding the Order Limits, this falls to just 3.3% (Table 14.14). • Tourism GVA amounts to £99.5m per annum (2019-2023 average). • Visit Britain data identifies that average annual expenditure (2017-19) associated with tourism day visits and overnight tourism stays was £84 million and £11 million respectively; circa £100 million total (paragraph 14.6.33).

Table 2.6 Alyson Read

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Tivetshall Parish Council				
ALR-001	General Matters	Rural character	Alyson Read, Chair of Tivetshall Parish Council, stated that the rural nature of Tivetshall makes it unsuitable for solar arrays, cabling, a BESS and a 400kV project substation, together with associated lighting, noise, road changes and traffic.	The Applicant refers to response TPC-008 within The Applicant's Response to Relevant Representations Part 4: Parish and Town Councils, and Parish Meetings [PDA-011] .
ALR-002	Planning Process	Adequacy of consultation	Ms Read stated that consultation had been inadequate, with no direct interaction with the Parish Council and digital exclusion of many residents. She stated that targeted consultation on Station Road referred to widening and vegetation removal without explaining how homes and farms would be affected, and that later letters referred to compulsory purchase without further detail. The ExA asked Ms Read to confirm whether the Parish Council had been consulted by the Applicant; Ms Read confirmed it had not.	The Applicant's Approach to Targeted Consultation, as presented in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033] sets out the parties the Applicant notified of the targeted consultation in October 2025. This includes a list of parish councils, environmental and socio-economic groups, MPs and local authorities. Moreover, the Applicant complied with the commitments in the published SoCC for the targeted consultation by notifying: All prescribed consultees under Section 42 of PA2008, all host and neighbouring local authorities (aligning with section 43 of PA2008), and any new land interests

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				relating to the additional land (aligning with Section 44 of PA2008) • All parties representing the interests of the localised communities, including relevant ward members, parish councils, MPs, community groups, and gateway organisations. This approach aligned with consultation under the SoCC and involved the same list of non-prescribed groups consulted during the Phase Two consultation. • Over 8,400 properties within the Scheme's Core Consultation Zone, (presented in Section 7 of the SoCC) with additional properties added to account for the revised boundary. • Any parties that had registered to be kept informed by the Applicant. Tivetshall Parish Council and community members of the parish were consulted alongside other parish areas within the Scheme area at all stages of consultation. This is outlined in the Applicant's outline of the core consultation zone in Consultation Report, Appendix 5: Statement of Community Consultation Materials [APP-029].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ALR-003	Transport and Access	Station Road, Lodge Road and the A140	Ms Read stated that widening Station Road (B1134) would lead to faster vehicles on a road bisecting the village and its PRow network. She stated that Lodge Road should be ruled out, except potentially for crossing points. Ms Read disputed the Applicant's statement that transport impacts would be negligible, stating that construction would affect all A140 commuters. In response to a question from the ExA, Ms Read explained that the Parish Council owns two speed awareness devices recording vehicle numbers and speeds, and that this data is shared with the police.	The Applicant acknowledges the concerns raised regarding Station Road (B1134), Lodge Road and the potential effects of construction traffic on local communities, including concerns relating to vehicle speeds and the interaction of traffic with the Public Rights of Way network. The effects of construction traffic have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]. The Applicant notes the comments regarding local traffic conditions and the Parish Council's collection of traffic speed and volume data. Construction traffic would be managed in accordance with the Outline CTMP [APP-201], which includes traffic management and mitigation measures intended to minimise impacts on local highway users and surrounding communities. All construction vehicles would be required to comply with the applicable speed limits and highway regulations. Where highway alterations are proposed as part of the Scheme, these would be designed and implemented to ensure the safe operation of the highway network for all users.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ALR-004	Design	Project substation	Ms Read stated that the project substation was initially described as 132kV, was then omitted, and reappeared as 400kV in the draft DCO. She stated that no information had been provided on its size or height, and that the Parish Council's email asking the Applicant for its distance from homes had not been answered.	The Applicant provided information on the change from a 132kV to a 400kV Project Substation in Site 1B during the Targeted Consultation (see Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]). The Applicant has provided comment on the scope of this Targeted Consultation at ALR-002.
ALR-005	Arboriculture	Loss of mature oak trees	Ms Read stated that widening single-track lanes would require the removal of numerous 200 to 250-year-old oak trees, and asked how the loss of their carbon capture would be mitigated.	As set out in the Outline CEMP [APP-196], where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Veteran/Ancient trees will not be removed. The removal of mature oak trees for road widening or maintaining visibility splays would be avoided where practicable. The Applicant will seek to agree traffic management measures with the Local Highway Authority along roads and at site accesses that avoid the need for removal of vegetation. This could include temporary speed reductions, use of traffic marshals and vehicle booking systems to manage and control vehicle movements. Proposed management measures are set out in section 7 of the Outline Construction Traffic Management Plan [APP-201]

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [APP-017].
ALR-006	Battery Safety	Fire and rescue access	Ms Read asked the Applicant to identify exactly how the two promised fire and rescue service access points would operate and to amend the draft DCO accordingly, stating that it is not currently possible to determine whether fire safety arrangements have been translated into access plans and enforceable DCO requirements.	The Applicant has submitted an Outline Battery Safety Management Plan [APP-200] (BSMP) using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). Section 4 covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. Requirement 6 in the Draft DCO [AS-032] requires a detailed BSMP to be approved by the relevant planning authority in consultation with Norfolk Fire and Rescue Service and the Environment Agency. The detailed BSMP must

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be substantially in accordance with the Outline BSMP [APP-200] .
ALR-007	Socio-Economics	Rural economy and recreation	Ms Read stated that the Scheme would harm the rural economy, hospitality and recreational use of the Boudicca Way, the Rebellion Way, byways and footpaths, as well as the area's clean air, dark skies and natural environment.	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry. The Applicant does not therefore consider that there will be significant adverse effects on the local tourism industry. Moreover, for skills and the labour market, a Moderate Beneficial impact – which is

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				significant in EIA – is assessed for all three phases. This is shown in Table 14.4 of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. ES Volume 1, Chapter 13 – Air Quality [APP-049] provides an assessment of potential air quality effects of road traffic emissions on sensitive human and ecological receptors during construction and decommissioning phases of the Scheme. Effects on human and ecological receptors during both construction and decommissioning are negligible and not significant. ES Volume 3, Appendix 7.11 – Lighting Strategy sets out the measures to minimise the effects of artificial lighting on dark skies. The interaction between the Scheme and the PRoW network has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] and the Outline PRoWPPMP [APP-203]. The assessment considered the effects of construction traffic, temporary PRoW closures, diversions and managed crossings on users of the PRoW network.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ALR-008	Landscape and Visual	Residential visual amenity	Ms Read stated that the proposed BESS would be sited on the fields behind the property, with the 400kV project substation between the BESS and the home, changing the outlook from rural to industrial. She stated that landscaping could not recreate the existing landscape, and noted that the Applicant's own assessment recognises the impact on the property.	The Applicant recognises that there would be a change in the outlook experienced from properties in proximity to the BESS and associated substations. Tree Belt planting is proposed around the BESS and 400kV substation to mitigate the views. The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032].
ALR-009	Battery Safety	Fire risk and emergency access	Ms Read stated that the household is concerned about a serious battery fire. She noted that ES Volume 1 Chapter 11 – Transport and Access [APP-047] states that emergency vehicles would access the BESS compound from two locations using an internal road network, but it is not possible to determine whether this has been incorporated into the access plans and enforceable DCO requirements.	Please refer to the Applicant's response at ALR-006.

Table 2.7 Kathy Thomson

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Topcroft Parish Council				
KT-001	General Matters	Impact on local economy	Kathy Thomson, speaking on behalf of Topcroft Parish Council, stated that the Scheme would disfigure the countryside, destroy productive agricultural land at a time of national food insecurity, compromise rural infrastructure and adversely affect local business and tourism. She highlighted brownfield sites and rooftops as preferred alternative sites.	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant does not therefore consider that the Scheme would have significant adverse impacts on tourism. Previously developed land, including brownfield land, was considered during site selection, as reported in the Site Selection Assessment [APP-215]. In relation to the potential for rooftop solar as an alternative to the Scheme, please refer to the response provided at DH-004 of this document.
KT-002	Ecology and Biodiversity	Barbastelle bats and wildlife movement	Ms Thomson stated that the removal of trees and hedgerows and addition of artificial lighting and solar arrays would affect barbastelle bat habitats and disrupt flight lines, and that fencing would impede animal movement through the countryside.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the Core Sustainance Zones (CSZ's) of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits. Habitat creation will be undertaken within these buffers. These measures will reduce the current baseline disturbance events associated

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				with agricultural practices (currently right up to the woodland edges), and provide enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status. In relation to animal movement, minimum offset distances from key ecological features are secured through the Design Principles, Parameters and Commitments [APP-213], and habitat corridors across the farmed landscape are reinforced. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors.
KT-003	Battery Safety	Thermal runaway and emergency response	Ms Thomson raised concerns about the risk of thermal runaway from lithium battery containers, stating that narrow lanes and local emergency services are ill-equipped to deal with such incidents. She added that construction traffic	The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: "<i>Final BESS design and site layout will have been validated through mandatory</i>

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			would also damage the local road network. In response to a question from the ExA, Ms Thomson confirmed that the Parish Council had not been in direct contact with the emergency services, but that she had attended a meeting at which a fire service representative was present.	<i>Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> A plume study has been undertaken as presented in Appendix B of the Outline BSMP [APP-200]. The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the BESS compound in the event of a BESS fire. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail. The Outline BSMP [APP-200] includes mitigation measures, including the preparation of an Emergency Response Plan (ERP) at detailed design stage that will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. The ERP could also contain measures such as notification of potentially affected residents and temporary closure of PRow. By way of a Requirement 6 of the Draft DCO [AS-032] prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the EA. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				planning, as guidance continues to develop in the UK and internationally.
KT-004	Planning Process	Accessibility of documentation	Ms Thomson asserted "procedural injustice", stating that the volume and technical nature of the application documents is beyond the time and resources of local residents.	The Applicant's Community Relations team has also been available to assist members of the public via a series of free-to-use communication channels (phone, post and email). These channels were publicised through newspaper adverts and press release, on the Applicant's website, in consultation materials and on-site notices. The application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice [OD-003], which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents.

Table 2.8 Carol Bailey

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of Great Moulton Parish Council				
CB-001	Alternatives and Energy Need	Need for Sub-site 1B	Carol Bailey, Chair of Great Moulton Parish Council, raised concerns regarding Land Parcel 1 and Sub-site 1B. Ms Bailey stated that national need does not justify this location, and that the Applicant must demonstrate why Sub-site 1B is necessary when the area already contains competing renewable energy proposals and the proposed 400kV Norwich to Tilbury overhead line, which appears not to have been chosen as a connection point. She stated that the assessment of alternatives must show that less harmful locations were genuinely considered, and that land availability must not substitute for a proper assessment of impacts.	The Applicant refers to the Site Selection Assessment [APP-215] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], which set out the staged, criteria-led approach to the selection of Sub-Site 1B for the National Grid Substation. The site selection had regard to the Horlock Rules and considered planning, environmental and operational factors, including proximity to the existing Bramford to Norwich 400kV overhead line, accessibility from the Strategic Road Network, and the avoidance of designated ecological, landscape and heritage assets. Three alternative Siting Zones along the Bramford to Norwich 400kV line were assessed on a RAG basis and discounted for reasons including operational conflict with the railway line, concentration of other consented and proposed energy infrastructure around Norwich Main Substation, heritage constraints, residential proximity and flood risk. As set out in the Grid Connection Statement [APP-207], a grid connection offer was received from NESO in October 2022, which contracts the Applicant to provide the land and

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				gain consent for the new Long Stratton 400kV National Grid Substation. Land availability has not substituted for the assessment of impacts; rather, the likely significant effects of the Scheme, including at Sub-Site 1B, have been assessed within the Environmental Statement [APP-036 to APP-195] and the planning balance considering those effects is set out in the Planning Statement [APP-209]. The Applicant refers to its response to representation ID SUC-004, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010], which explains the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand.
CB-002	Cumulative Effects	Land Parcel 1	Ms Bailey stated that Land Parcel 1 is a cumulative impact hotspot where substations, 400kV overhead lines, cables, construction traffic, transformer deliveries, lighting, drainage, noise and battery infrastructure combine, and asked the ExA to consider the real-world cumulative effect on Great Moulton rather than a piecemeal assessment.	All topics chapters within the Environmental Statement consider the project as a whole, as defined in ES Volume 1 Chapter 4 – The Scheme [APP-040]. The in-combination effects between the significant effects identified in individual topic chapters in ES Volume 1 Chapter 19 – In-Combination Effects Assessment [APP-055]. As such, all effects at any given location are considered holistically.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
CB-003	General Matters	Detailed design	Ms Bailey stated that too much is left to detailed design and later mitigation, with commitments qualified by "where practicable", including on fire safety, drainage, contaminated firewater, ecology, construction access, noise and archaeology. She raised concerns about low frequency noise from transformers, corona discharge, cooling fans and oil pumps, and asked how the ExA could be satisfied that impacts are acceptable when major safeguards remain undetermined.	Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205]. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the Draft DCO [AS-032] .
CB-004	Water Environment	Groundwater and private water supplies	Ms Bailey stated that scarce groundwater and private water supplies on the Great Moulton Plateau could be affected by piling, drainage, pollution pathways, transformer oils and contaminated firewater.	The mitigation measures set out in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] and secured through the Outline CEMP [APP-196] , Outline OEMP [APP-197] and Outline DEMP [APP-198] demonstrate there will be no detrimental impact in water quality, and the scheme will not impact on water quantity as it will mimic existing natural drainage arrangements. The Outline BSMP [APP-200] sets out measures to deal with firewater at section 4.3.
CB-005	Ecology and Biodiversity	Barbastelle bats	Ms Bailey stated that the evidence on barbastelle bats, including habitat connectivity, lighting and disturbance,	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			requires particular scrutiny given the species' sensitivity to environmental change.	[APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
CB-006	Soils and Agricultural Land	Permanent loss of BMV land	Ms Bailey stated that the Scheme would result in the permanent loss of Grade 2 BMV land, including at least 6.1 hectares for the National Grid substation alone.	The land quality of the permanent infrastructure is considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] [APP-051] , and losses due to permanent infrastructure and tree planting are qualified and quantified.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The location of the fixed infrastructure on Grade 2 land was considered carefully, including the effect on agricultural land quality, and a decision was made based on a variety of factors, as set out in the Applicant's response in reference CB-001. The ES assesses the potential for adverse effects. The likely scenario is that all but the BESS and substation, and the woodland planting, will be restored, and the effect will be 'not significant'. However, the ES also includes a worst-case assessment which concludes that if all the areas disturbed are not restored there will be an adverse effect which is 'significant adverse' (ES Chapter 15 [APP-051] para 15.8.78).
CB-007	Battery Safety	Thermal runaway and abnormal loads	Ms Bailey raised concerns about thermal runaway, toxic releases, contaminated firewater and possible evacuation of people and livestock, and about whether the highway network and emergency arrangements can safely accommodate abnormal load movements. She confirmed that the Parish Council unanimously opposes the application.	Please refer to the Applicants response at KT-003. 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,

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. 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. 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;

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 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 • 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.

Table 2.9 Ross Jolliffe

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of the South Norfolk Tree Warden Network				
RJ-001	Planning Process	Readiness of the application	Ross Jolliffe, on behalf the South Norfolk Tree Warden Network, stated that Planning Act 2008 applications should be front-loaded and ready for consent. He said this application is not, noting the ExA's direction for an update on white-clawed crayfish.	The acceptance of the Applicant's DCO application for Examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties and that the Application is Examination ready. For White Clawed Crayfish, the Applicant has provided an update on this at Procedural Deadline A within the Applicants Position on White Clawed Crayfish document [PDA-007].
RJ-002	Arboriculture	Trees, hedgerows and woodland	Mr Jolliffe stated that impacts on trees, hedgerows and woodland remain unclear, with even tree counts differing between documents. Further pre-construction surveys and arboricultural method statements demonstrate information gaps. He cited Natural England's request for further information on ancient woodland and ancient or veteran trees, and a commitment to follow Natural England and Forestry Commission standing advice.	The impacts on trees, hedgerows and woodland are clearly shown on the Annex D Tree Impact Plan within the ES Volume 3: Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150] . Further pre-construction tree surveys and arboricultural method statements will be provided due to the time gaps between planning submission and construction, therefore these can ensure the tree survey data is up to date prior to the construction to inform the tree protection zones to be applied for the retained trees during construction. The Applicant is committed to follow Natural England and Forestry

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Commission standing advice on ancient woodland, ancient trees and veteran trees including the buffer zones applied for ancient woodlands and ancient or veteran trees as set out in the Design Principles, Parameters and Commitments [APP-213] .
RJ-003	Environmental Assessments	Rochdale Envelope and worst case	Mr Jolliffe disputed that the environmental assessment is sufficient or assesses a realistic worst case within the Rochdale Envelope, given about two years' construction, up to 60 years' operation and then decommissioning.	The Environmental Statement assesses the anticipated effects of the Scheme throughout all phases in accordance with the relevant legislation and industry good practice.
RJ-004	Planning Process	Legislative compliance	Mr Jolliffe stated that compliance with the Habitats Regulations, the Water Framework Directive and the Wildlife and Countryside Act 1981 is not optional, and requested that the Examination proceeds on that basis.	Compliance with the Water Framework Directive is set out in ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment . Compliance with the Habitats Regulations Directive is set out in the Shadow Habitats Regulations Assessment [AS-038] . Compliance with the policies of the Wildlife and Countryside Act is set out in ES Chapter - Ecology and Biodiversity [APP-044] .

Table 2.10 Robert Hazell

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
RH-001	Transport and Access	Church Hill AIL route	Robert Hazell, of Adelaide Cottage, Saxlingham Nethergate, stated that the Applicant has not demonstrated that Church Hill is a safe, workable or acceptable Abnormal Indivisible Load (AIL) route. He referred to NCC's position in The Applicant's Response to Relevant Representations Part 1 [PDA-008] that the transport strategy for Sites 7 and 10 cannot be supported, and to National Highways' comments at NH-011 and NH-012 of The Applicant's Response to Relevant Representations Part 2 [PDA-009] that the AIL route has not been determined and a workable strategy should be established before a decision is made.	The Applicant acknowledges the concerns raised regarding the proposed AIL route and the ongoing discussions with Norfolk County Council and National Highways. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [EXAM/9.2].
RH-002	Transport and Access	Access locations and CTMP	Mr Hazell stated that access locations remain unfixed and the Applicant used a 30m assumption instead of requested receptor numbers. A CTMP cannot replace proof that a route works, while The Applicant's Response to Relevant Representations Part 3 [PDA-010] confirms that vegetation and	The Applicant acknowledges the concerns raised regarding the level of detail currently provided within the Application for the proposed AIL strategy and associated highway mitigation measures. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			street-furniture removal and over-sail or over-run works remain undefined.	Responses to the Examining Authority's First Written Questions [EXAM/9.2].
RH-003	Cultural Heritage	Vibration effects on listed buildings	Mr Hazell stated that his Grade II listed home directly abuts Church Hill, but traffic-vibration effects on heritage assets were scoped out (CUL-12, The Applicant's Response to Relevant Representations Part 5 [PDA-012]) and no property-specific structural or vibration assessment was undertaken. Church Hill is within a conservation area; he cited the Planning (Listed Buildings and Conservation Areas) Act 1990 and EN-1's requirement to give great weight to heritage conservation.	The Applicant notes the comments made regarding traffic vibration effects on heritage assets. The publication <i>Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from groundborne vibration</i> (British Standard BS7385- 2:1993) states in paragraph 7.5.2 that “a building of historical value should not (unless it is structurally unsound) be assumed to be more sensitive”, and as such, the conclusions of the noise and vibration assessment (see ES: Chapter 12 – Noise and Vibration [EN0110014/APP/6.1.12]) apply regardless of a building's designation.
RH-004	Public Rights of Way	Footway beside the war memorial	Mr Hazell stated that the footway beside the war memorial is the only pedestrian route to school for most of the village, and that its removal would force pedestrians, including children, onto the carriageway.	The Applicant acknowledges the concerns raised regarding the footway adjacent to the war memorial and its role in providing pedestrian access through the village, including access to local facilities and schools. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [EXAM/9.2].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
RH-005	General Matters	National Gas Transmission asset	Mr Hazell noted that National Gas Transmission (NGT) confirms FM05 is essential high-pressure national transmission infrastructure (NGT-03, [PDA-009]) and remains an objector because protective provisions are not agreed.	The Applicant is currently in discussion with National Gas Transmission and will continue to do so throughout the development of the Scheme to agree protective provisions.
RH-006	Transport and access	Church Hill	Mr Hazell requested a defined route, binding controls, vibration evidence, protection of the school footway and agreed NGT provisions. If Church Hill cannot be shown acceptable, he asked that it be removed from the AIL route and requested an accompanied site inspection.	The Applicant acknowledges the concerns raised regarding the proposed AIL route, associated mitigation measures and pedestrian access. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [EXAM/9.2]. Section 6 of the Outline CTMP [APP-201] sets out the framework for the management of AIL movements, including the safety measures that would be implemented to facilitate these movements. Further detail regarding the management of AIL movements would be provided within the detailed Construction Traffic Management Plan, which would be secured through the requirements of the Draft DCO [AS-032].

Table 2.11 Helen Pye

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
HP-001	Cultural Heritage	Listed buildings and conservation area	Helen Pye, stated that her Grade II listed, timber-framed home dates from at least the 16th century, has no foundations and stands behind the listed war memorial. The AIL route would permanently widen the street, removing street furniture, ancient hedges and an 18th-century wall and encroaching on the memorial and green, irreversibly harming the conservation village. Ms Pye raised concerns about vibration from AILs affecting her home and similar buildings, and the 13th century stained glass at St Mary's Church, Church Hill, which she stated is the oldest in Norfolk.	The Applicant notes the comments and would like to refer to its response to Helen Pye [RR-0749] in the Applicant's Response to Relevant Representations - Part 5 [PDA-012] under comment ID CUL-009. Regarding traffic vibration effects on heritage assets, the publication <i>Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from groundborne vibration</i> (British Standard BS7385- 2:1993) states in paragraph 7.5.2 that “a building of historical value should not (unless it is structurally unsound) be assumed to be more sensitive”, and as such, the conclusions of the noise and vibration assessment (see ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]) apply regardless of a building's designation. The Applicant acknowledges the concerns raised regarding the proposed AIL route through Saxlingham Nethergate. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [EXAM/9.2].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
HP-002	Socio-Economics	Property values	Ms Pye stated that the works would make homes unsaleable for the foreseeable future.	In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in Part 5 – Thematic Response to Relevant Representations [PDA-012] .
HP-003	Transport and Access	Alternative AIL routes	Ms Pye stated that alternative routes could avoid homes, including the original route via Fairstead Lane.	The Applicant acknowledges the comments regarding alternative AIL routes. The proposed route was developed by a specialist abnormal load transport consultant following an assessment of alternative route options and relevant constraints. Alternative routes, including via Fairstead Lane, were considered but were not determined to be suitable for accommodating vehicles of the size and dimensions associated with the proposed AIL movements.
HP-004	Water Environment	Flooding in Saxlingham	Ms Pye stated that Saxlingham has a known flooding issue, with the dip outside her home filling within 45 minutes of heavy rain. Heavy vehicles could damage roadside and underground drains, increasing risk; the council has recently installed three leaky dams.	ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] has been developed based on the requirements of the NPS' and NPPF, which requires that development can have no detrimental impact on flood risk to third parties. The development will not impact on the pattern or quantity of runoff arising from the site. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Responses to the Examining Authority's First Written Questions [EXAM/9.2].

Table 2.12 Jane Garrec

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
JG-001	Water Environment Transport and access	Infilling of dykes and weak crossings	Jane Garrec, of Spring Hill, Norwich Road, Saxlingham Nethergate, stated that road widening for AILs would infill flood-prevention dykes. AILs would also cross two waterways where the road forms thin bridges that may not bear their weight. The village centre already floods despite maintained dykes. She also stated that works for AILs would affect Grade I and II listed buildings within the conservation village	The Applicant acknowledges the concerns raised regarding the proposed AIL route. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [EXAM/9.2]. AIL management measures are set out in point 6.4 of the Outline Construction Traffic Management Plan [APP-201].
JG-002	Noise and Vibration	Vibration and road damage	Ms Garrec stated that AIL weight and vibration could destabilise and devalue her hillside home. Heavy traffic has already caused two Anglian Water pipe bursts, and an oil tanker entered a manhole outside her drive; she holds photographs.	Spring Hill is approximately 14 m from the edge of the carriageway of Norwich Road. An assessment of construction traffic vibration is presented within Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. At distances of approximately 10 m or more, the vibration level is expected to be 1 mm/s PPV or below during HGV passbys, which is below the Significant Observed Adverse Effect Level (SOAEL). High sensitivity receptors which are 10 m or more away from access roads would therefore experience short-

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				term negligible to minor adverse effects, which are not significant. Based on traffic data obtained at ATC6 and ATC7 as reported within ES Volume 1, Chapter 11 - Transport and Access [APP-047], a number of rigid vehicles with four or more axles or articulated lorries passed along The Street and Broaden Lane during the traffic survey. Properties which front these roads are therefore already likely to be exposed to comparable levels of vibration which would be generated by AIL required for the Scheme.
JG-003	Human Health	Loss of green space	Ms Garrec stated that losing green agricultural land and wildlife would seriously harm mental wellbeing.	The Applicant acknowledges the concern that changes to green agricultural land, wildlife and the rural environment may affect mental wellbeing, particularly through impacts on people's connection to nature, sense of place and enjoyment of the countryside. The Human Health Summary Statement presented in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that landscape character, visual amenity and access to nature are important determinants of health and wellbeing, and that perceived environmental change can be a pathway through which wellbeing effects may occur. Equality Impact Assessment [APP-214] also considered issues including access to

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				nature, visual amenity, place attachment and mental wellbeing and concluded that, with mitigation in place, significant negative equality impacts are unlikely at a population level. The Scheme includes a range of embedded landscape, ecological and green infrastructure measures secured through the Design Principles, Parameters and Commitments [APP-213] and the Outline Landscape and Ecology Management Plan [APP-199]. These include substantial landscape planting, habitat creation and enhancement, reinforcement of hedgerows, woodland planting and the retention of green corridors, which are intended to strengthen biodiversity, support habitat connectivity and assist the integration of the Scheme within the landscape. The Human Health Summary Statement concludes that, although landscape and visual effects would occur, they are generally expected to reduce over time as mitigation planting matures and are not anticipated to result in significant long-term adverse effects on human health. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments.

Table 2.13 Suzanne Clarke

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SC-001	Transport and Access	Lodge Road access	Suzanne Clarke, a Lodge Road resident for 49 years adjoining Site 2A, stated that the PEIR proposed one Station Road (B1134) access, with vehicles crossing Lodge Road and Frith Way at CRC2 and CRC3. A later link from CRC2 to Lodge Road creates another B1134 access. Citing NCC's preference for A- or B-road access, she requested removal of the Lodge Road access from the DCO.	Lodge Road is identified as a construction access route to reach access A06. A06 is a contingency access for works to CRC2. The priority would be to use access A02 on B1134. Subject to detailed design and the final sequencing of works in the BESS site and 1B it was considered prudent to provide an alternative option. The use of A06 and Lodge Road is subject to further dialogue with NCC.
SC-002	Public Rights of Way	Bridleway safety	Ms Clarke stated that the road beside Site 2A is a bridleway and that the hedge relied on as a margin is on her land, outside the Order limits. She asserts the moving panels would make noise, and requested about 30m of vegetation to protect horse riders. In response to a question from the ExA, Ms Clarke stated that the British Horse Society's existing recommendations do not cover this type of moving panel.	Noise associated with panels moving would be due to the operational of the tracking motor, which is expected to have a sound power level of approximately 50 dB L_w. Based on this, the resultant specific sound level at 15 m would be below 20 dB $L_{Aeq,Tr}$. The British Horse Society published a document entitled Noise and routes with horse use in June 2025. Within this document it states: <i>“Considering how similar a noise may be to a natural predator is a useful guide to whether a horse will be troubled by it. A quiet rustling is likely to have greater impact than a high speed</i>

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>train because the former could easily be associated with a predatory animal moving into position to attack whereas a flow of motor traffic is a continuous steady loud noise which is less likely to be a predator; it can be heard from far away and the majority of horses these days have been exposed to and accepted commonly occurring mechanical noises from their birth. There are many situations of horses unperturbed by trains or motor traffic, even for the first time, in fields or on bridleways alongside a railway or motorway."</i> In this respect, horses are not expected to be exposed to sudden noise from the Scheme during operation, as they would have their noise exposure gradually increased as they become closer to the noise source. Research presented in Constant traffic noise affects the behaviour and physiology of naïve horses at pasture (Malsburg et al, 2026) suggests that vigilance (alertness and startle response) is affected by the level of noise exposure. The research does not present the effects below sound levels of 50 dB, and therefore it is not clear if effects may occur at this level. However, at the lowest levels of exposure within the research (54 dB) there appeared to be no significant statistical

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				change in vigilance. With the calculated sound levels in PRowS being below 50 dB $L_{Aeq,T}$, noise effects on equestrian users are not expected to be significant.
SC-003	General Matters	Decommissioning bond and water supply	Ms Clarke stated that there is no decommissioning bond, Anglian Water has refused the required water supply and National Grid has not fixed the substation location.	The Development Consent Order will provide the primary enforcement mechanism for decommissioning. This is secured under Requirement 21 of the Draft DCO [AS-032], and a failure to decommission in accordance with the approved plan pursuant to that Requirement would constitute a criminal offence. It is well established by precedent that a decommissioning bond is therefore not necessary to be secured on the face of a solar DCO in addition to that Requirement. The Applicant notes the concerns about water scarcity in the area. The Applicant has engaged with Anglian Water and carried out a water supply assessment within ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This is in place by Anglian Water to protect

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				domestic water supplies. The Applicant welcomes continued engagement with Anglian Water throughout the Examination process. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand.
SC-004	Planning Process	Access to documents	Ms Clarke stated that the process disadvantages those lacking digital confidence: paper application copies cost £750 and the library has one computer.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Community Relations team has been available to assist members of the public via a series of free-to-use communication channels (phone, post and email). These channels were publicised through newspaper adverts and press releases, on the Applicant's website, in consultation materials and on on-site notices. The targeted consultation materials were available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Preliminary Environmental Information Report remained available to view at Long Stratton Library until early 2026, including during the targeted consultation, which took place between October and December 2025.

Table 2.14 Nigel Stringer

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
NS-001	Water Environment	Spring-fed private water supply	Nigel Stringer, of Boyland Hall, Morningthorpe, adjoining Site 5, stated that his sole water supply is a spring-fed well and have no alternative water supply if polluted.	Risks to abstractions (including Private Water Supplies (PWS)) have been assessed within ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]. The assessment is informed by: • The Environment Agency's dataset of permitted abstractions. • Information provided by South Norfolk Council in response to an enquiry for all Private Water Supplies (PWS) registered with the Council pursuant to the Private Water Supplies Regulations. • The BGS' water wells dataset. BGS water well ref: TM29SW14/BJ is located at Boyland Hall, and is shown on ES Volume 2, Figure 16.5 Locations of Private Water Supplies [APP-109] as being located outside of the Order Limits. Site 5 is the nearest part of the Scheme to Boyland Hall. The works proposed within Site 5 comprise the construction of PV arrays on piled foundations. As described in Appendix 16.1, Site 5 has a longstanding history of agricultural use, and as

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				shown on ES Volume 2, Figure 16.3 Sources of Potential Contamination [APP-107] there are no identified sources of potential contamination within Site 5 that could potentially be mobilised by the construction of the Scheme. The likelihood of potential risks to the PWS from mobilisation of existing contamination within the ground are therefore assessed very low. Site 5 will be investigated and further assessed as part of the post-consent ground investigation and the associated interpretative assessments. The mitigation measures set out in ES Volume 3: Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] and secured through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] demonstrate there will be no detrimental impact in water quality, and the scheme will not impact on water quantity as it will mimic existing natural drainage arrangements. Mr Stringer has been contacted by the Applicant and we welcome engagement to assess his PWS. Details are sought on the location, depth and construction (e.g., the depth of the borehole/well, and the depth that the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				borehole/well is lined to) to inform the Applicants assessments.
NS-002	Ecology and Biodiversity	Wildlife on adjoining land	Mr Stringer raised impacts on wildlife in his 11 acres of ancient woodland, including bats, nesting owls, newts and deer.	The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212]. The mitigation hierarchy has been applied to avoid, mitigate or compensate, throughout the design process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], the Outline OEMP [APP-197], the Outline DEMP [APP-198], Outline LEMP [APP-199] (which is a secured document) and the ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161].
NS-003	Noise and Vibration	Construction and operational noise	Mr Stringer raised concerns about years of construction traffic noise and permanent day-and-night noise from batteries and substations.	The assessment of construction noise and vibration is presented in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. Mitigation measures to control noise and vibration are described Outline CEMP [APP-

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				196] and Outline OEMP [APP-197] to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the Draft DCO [AS-032]. Contractors would be required to ensure that works are carried out in accordance with best practicable means as stipulated in the Control of Pollution Act. In accordance with Requirement 13 of the Draft DCO [AS-032] a detailed CEMP will be submitted to and approved with the relevant planning authority. If required, the Applicant will seek prior consent for noisy works under Section 61 of Control of Pollution Act. A Section 61 submission will describe the construction methods, predicted noise levels, proposed working hours, monitoring strategy, communication protocols with the relevant planning authority and the mitigation techniques to be employed. The purpose of the submission is to demonstrate that noise and vibration have been controlled as far as reasonably practicable. In relation to operational noise outcomes, the impacts and effects at Boyland Hall are

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considered to be similar to those experienced at NSR28 (dwellings along Bungay Road). During the daytime, night-time and early morning periods, the rating level is calculated to be below the background sound level at NSR28, which results in a negligible impact. At a high sensitive receptor this results in a negligible effect which is not significant. Noise emitting plant will be selected with consideration of noise emissions where practicable. In addition, the following measures will apply at this receptor location: 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.
NS-004	Transport and Access	Panel washing	Mr Stringer stated that Anglian Water had reportedly refused the Applicant permission to use its water for panel washing, and raised concerns about the number of water tankers that would be needed to wash that many acres of panels.	An Outline OTMP [APP-202] has been prepared. The plan confirms the expected operational activities and the anticipated number of maintenance trips per month.

Table 2.15 Mark Williams

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MW-001	Alternatives and Energy Need	Generation output and homes powered	Mark Williams, a Hempnall resident, said laboratory-based metrics overstate the benefit of losing 2,718 acres. He said the 115,000-homes claim ignores winter demand, summer oversupply and curtailment.	The Applicant provided a conservative estimate of the equivalent number of homes the Scheme could power at an early stage of the project development. The Government has published a methodology note (available at Estimating renewable generation and homes powered: methodology note - GOV.UK) which confirms that the Applicant's calculations are conservative and the claim is fully warranted. Figure 8.2 of the Statement of Need [APP-206] shows how solar generation is indeed lower in the winter (when wind generation is higher); but that it is higher in the summer, when wind generation is lower. In combination with Figure 8.11 of the Statement of Need, the Applicant has demonstrated how a combination of renewable technologies, but primarily wind and solar, are expected to support the delivery of a dependable, year-round, low-carbon energy system, consistent with the Government's aims. The Applicant's response to reference MW-002 below provides information on how the proposed BESS will support the solar scheme

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in balancing supply with demand at all times of the year. Chapter 7 of the Statement of Need describes that the Scheme proposes to connect to a well-connected section of the National Electricity Transmission System which has available transmission capacity and is geographically distant from areas of the network which are currently constrained. As such, transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations. Further, the Scheme is unlikely to receive consumer-funded compensatory curtailment payments. Operating a BESS as an associated part of the Scheme would support the operation of the main solar array through any periods should a risk of commercial curtailment arise, increasing benefits arising from the Scheme towards the security and affordability of supplies and the provision of low-carbon energy to consumers.
MW-002	Battery Safety	Round-trip efficiency	Mr Williams stated that batteries do not generate power and lose 15–20% of generated energy as heat through round-trip inefficiency.	A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. In summary, the BESS is proposed to support the operation of the solar site by storing

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				generation when it is abundant and releasing it when demand is higher. At times when the BESS is not supporting the operation of the principal solar site, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. A current typical round-trip efficiency value for grid-connected BESS is 88%. This is much higher than the efficiencies of other generating assets as are described in Section 6.8 of the Statement of Need [APP-206]. Storing abundant low-carbon generation in BESS with 88% efficiency (when that generation might otherwise be wasted) is significantly more beneficial to the achievement of the government's energy objectives than burning fossil fuels at lower efficiencies while releasing CO2 into the atmosphere.
MW-003	Landscape and Visual	Industrialisation and PRow experience	Mr Williams stated that glass, steel, fencing and substations would replace Hempnall's landscape, confining PRow users within narrow corridors bordered by security fencing and CCTV.	The Applicant does not agree that the Scheme would replace Hempnall's landscape with glass, steel, fencing and substations. The landscape strategy retains the existing field pattern where practicable, incorporates substantial mitigation planting, and seeks to integrate the Proposed Development within the surrounding rural landscape. While solar infrastructure, fencing and associated development would introduce

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				new elements into the landscape, these would be dispersed across the Site and viewed in the context of the wider agricultural landscape rather than dominating it. A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				DEMP [APP-198] , respectively via the Draft DCO [AS-032] .

Table 2.16 Anne Bartaby

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
Comments on behalf of the General Aviation Awareness Council				
AB-001	Aviation	Tibenham Airfield	Ann Bartaby, GAAC Head of Planning, stated that the Applicant considered only glint and glare at Tibenham Airfield, finding no issue without appraisal, while ignoring gliding operations and cumulative effects with the Station Road solar site. It also omitted engine-failure risk, Tibenham's wider value, policy support for general aviation and justification for Site 1 at the end of Runway 08/26.	The Applicant has acknowledged the potential impact with the Station Road solar site. For this specific scheme, it is understood that the glare intensity is within the acceptable limits in accordance with the associated guidance and industry best practices. Instances of glare for the Station Road solar site that are greater than the acceptable limits had been considered in context of the aerodrome's operations and were judged not to significantly impact activity associated with Tibenham Airfield. The East Pye Scheme is to be configured differently to the Station Road Scheme (in terms of panel heights, tilts and azimuth angles) and therefore instances of solar reflections will not coincide and result in a significant cumulative impact. At its closest, solar panels pertaining to the Station Road solar site measure 1.0km from threshold 26 at Tibenham Airfield. Considering a 60-degree sector (30 degrees either side of the extended runway centre line) out to 2km, the Station Road solar site occupies 8.09% of land. The Station Road scheme occupies land that is

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				at a bearing of 107 degrees from threshold 26. The closest panels pertaining to the East Pye Scheme occupies land at a bearing of 84 degrees. Therefore, the two developments are not adjacent when considering the closest panels to threshold 26. The solar panels pertaining to the East Pye Site adjacent to the Station Road site is laterally clear of the 2km sector as presented in the assessment [APP-222]. Extending this sector out to a distance greater than 2km is not deemed appropriate, as a pilot able to reach this lateral distance would not be considered a failed take-off. Therefore, a cumulative impact upon land available for an emergency landing is not predicted.
AB-002	Aviation	Bird strike and cumulative effects	Ms Bartaby cited research indicating that solar installations attract more birds. She asked that aviation be a principal Examination issue, covering cumulative effects with approved solar schemes and the Norwich to Tilbury overhead line, and full justification for the sites.	The Applicant disagrees that Solar PV (in an arable landscape setting) presents a significant collision risk to birds/bats. The Natural England publication ' <i>Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology (NEER012)</i> ' states that ' <i>incidental and informal evidence suggests that the collision risk presented by solar panels to birds is low but not impossible. It is likely that the infrastructure associated with transporting electricity (e.g. powerlines) presents more of a collision risk for</i>

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>birds than the solar arrays themselves. With regards collision risk to bats, there is no evidence</i>'. The Scheme does not propose any significant increase in overhead lines (which are already present within Site 1 (proposed National Grid point of connection)). In addition, research by scientists from the RSPB and University of Cambridge (Copping J P et al. 2025) as part of the Centre for Landscape Regeneration found that (hectare for hectare) solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than surrounding arable farmland. With (appropriately managed) solar farms having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland. This suggests that collision risk or displacement is not a major factor in limiting bird species abundance and numbers.

Table 2.17 David Fine

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-001	Planning Process	Consultation with Pulham Market	David Fine, a Pulham Market resident, stated that residents learned only in May of the parish cable corridor. He noted SNDC's February 2023 observation that the Applicant had barely considered Pulham Market and asked how the ExA would rectify this.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The acceptance of the Applicant's DCO application for Examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory preapplication duties. The Applicant has responded to PINS Section 51 Advice under the Applicant's Response to Advice at Acceptance [AS-001]. As noted, Framingham Earl Parish Council was not classified as a prescribed consultee for the statutory consultation as the parish did not host the PEIR Order Limits. Therefore, they did not receive postal notifications and were not noted in the Consultation Report or relevant Appendices. There is therefore nothing to signpost

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Framingham Earl Parish Council to be consulted at this stage. For purposes of the subsequent Targeted Consultation (which took place between October and November 2025), Framingham Earl Parish Council was consulted, noting minor additions to the Order Limits. Consultees for this consultation are listed in the 'Approach to Consultation Document' in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]. This document was shared with Norfolk County Council and South Norfolk Council, the host local authorities, in draft format. The list was subsequently updated prior to the start of the consultation to include Framingham Earl Partish Council, who were added following further due diligence in relation to the final nature and number of changes. The Applicant also confirms, in response to Section 51 advice, the Applicant served notice of the accepted application under 56(2)(a) of the Planning Act on Pulham Market and Framingham Earl Parish Council, as well as other relevant consultees. The Applicant also sought to consult with those beyond the Core Consultation Zone (those that fall under Section 47 of the Planning Act 2008)

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and raised awareness of the consultation in the following ways: • Directly notifying any individual who has registered to receive information about the Scheme, including those who have expressed concern or opposition to the proposals; • Published a Section 48 notice in local and national press, and the London Gazette; • Advertised the consultation in local media outlets (Eastern Daily Press and Diss Express) reaching audiences beyond the Core Consultation Zone; and • Published consultation materials so they were available to view online. The Applicant maintained a series of free-to-use communication channels (phone, post and email) through the pre-application period. These channels were publicised throughout the Applicant's literature (such as newspaper adverts and press releases, on the project website, and on consultation materials including leaflets and posters). The Applicant welcomed enquiries and feedback from any Interested Party through these channels.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
DF-002	Battery Safety	Examination of battery safety	Mr Fine asked whether lithium-ion battery safety would be examined separately from community health and wellbeing, noting other BESS proposals such as EDF's Norwich scheme.	The Applicant notes this comment. An Outline BSMP [APP-200] has been prepared which identifies how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. Additionally, a Human Health Summary statement is presented in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and Mental health has also been considered, as presented in the Equality Impact Assessment [APP-214] .
DF-003	Cumulative Effects	Nearby schemes	Mr Fine asked whether nearby schemes, including Tasway Energy Park and EcoPower Suffolk Solar, would be considered.	Other projects up to 25km from the Scheme were considered for their potential cumulative impacts with the Scheme. Ecopower Suffolk Solar was considered as a part of the cumulative effects assessment, however the Tasway Energy Scheme has been withdrawn from the DCO process and is on indefinite hold and as such wasn't considered. The full list of cumulative schemes can be found in ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116] .
DF-004	Cultural Heritage	Medieval landscape	Mr Fine, a professional archaeologist, stated that the Scheme crosses a unique medieval landscape missed by the Applicant's consultants. The threat extends beyond the cable corridor to medieval access roads, including in	The Applicant notes the comments regarding the presence of a medieval landscape, the assessment of which is provided as part of the historic landscape character investigations and assessment in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and is supported

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Saxlingham Nethergate. He asked whether the ExA would refer this to independent specialists.	by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 - AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], the latter of which includes the discovery of medieval industrial activities in the wider surroundings of Saxlingham Nethergate. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage asset. The Applicant considers that these assessments have been produced in line with the relevant legislation, planning policy and professional guidelines, and are considered to be robust and appropriate for the assessment of the Scheme. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views, including historic

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				landscape components. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206] and ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential direct impacts to historic landscape character.

Table 2.18 Loretta Dunmore

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
LD-001	Human Health	Distress to residents	Loretta Dunmore, a Great Moulton resident, described distress caused by repeated developer approaches, including letters to a resident's deceased parents and an elderly couple overwhelmed by the process. She notes that residents also have concerns about living beside a National Grid substation, the health effects on children, and the potential fire risk.	The Applicant acknowledges concerns regarding the wellbeing of residents in Great Moulton, including older people, children and those with existing health conditions. These matters have been considered within the Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and the Equality Impact Assessment [APP-214], which conclude that, with mitigation in place, the Scheme would not result in likely significant adverse effects on population and human health, including for vulnerable groups such as children. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments. The Human Health Summary Statement identifies the potential pathways arising from a credible BESS incident, including smoke exposure and contamination of the water environment. The basis for the assessed likelihood, separation distances, prevention and detection measures, emergency response arrangements and firewater controls is set out in the Outline BSMP [APP-200] and relevant supporting technical evidence. On the basis of those controls and the secured process for approval of the detailed BSMP following consultation with the relevant bodies, the Applicant has not identified a likely significant effect on population and human health from this pathway.
LD-002	Transport and Access	Road closures and diversions	Ms Dunmore stated that, as Great Moulton lacks shops, a post office, surgery and school, road closures,	The Applicant acknowledges the concerns raised regarding potential disruption to local journeys during construction. Construction

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			diversions and construction traffic would lengthen and increase the difficulty and cost of essential journeys.	traffic and any temporary traffic management measures would be managed in accordance with the Outline CTMP [APP-201] , which includes measures to minimise disruption to highway users, where reasonably practicable. Any temporary road closures or diversions would be carefully managed and would be limited in duration wherever possible. The Applicant does not consider that construction traffic would result in significant effects on access to local services and facilities.
LD-003	Public Rights of Way	Loss of historic routes	Ms Dunmore stated that, without a park or formal green space, PRow closures would remove safe off-road access and push people onto narrow, pavement-free roads. Historic routes—Hundred Lane and Narrowgate Way—linking to medieval Little Moulton (the Sanctuary Field) would be permanently lost.	The Applicant acknowledges the concerns raised regarding the Public Rights of Way network and access to local green space. No permanent closures of Public Rights of Way are proposed as part of the Scheme. Where temporary closures are required during construction, alternative routes would be provided and managed in accordance with the Outline PRowPPMP [APP-203] . Following construction, Public Rights of Way would be reinstated and returned to use. The Applicant therefore does not agree that the Scheme would result in the permanent loss of Public Rights of Way connections, including Hundred Lane and Narrowgate Way.
LD-004	Planning Process	Stress of the process	Ms Dunmore stated that residents find consultation and Examination	The Applicant urges members of the public to engage with guidance produced by the Ministry

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			confusing, stressful and draining, and asked the ExA to consider those living with the outcome alongside technical evidence.	of Housing, Communities and Local Government on the Nationally Significant Infrastructure Project (NSIP) process, including 'Guidance on the Examination Stage of an Application'. Planning Act 2008: Guidance on the examination stage of an application - GOV.UK

Table 2.19 Kim Dyke

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
KD-001	Human Health	Assessment of mental health effects	Kim Dyke, a retired nurse, Shotesham resident, parish councillor and BEPS member, stated that the Equality Impact Assessment [APP-214] recognises stress and anxiety, while the Policy Compliance Document [APP-210] dismisses long-term health effects as negligible and temporary. She cited "solastalgia" (distress from unwanted environmental change) as a planning consideration.	The Applicant acknowledges the concerns raised regarding stress, anxiety and the potential effects of environmental change on mental wellbeing. The Policy Compliance Document [APP-210] does not dismiss these matters; rather, it reflects the conclusions of the Equality Impact Assessment [APP-214]. The Equality Impact Assessment [APP-214] identified both potential benefits, including employment opportunities and improved connectivity through permissive paths, and potential temporary adverse effects arising from changes to access, traffic, noise and air quality. However, it concluded that, with mitigation in place, significant negative equality impacts are unlikely. The Policy Compliance Document [APP-210] reflects these conclusions and the overall finding that the Scheme would not result in likely significant adverse effects on population health and wellbeing. The Applicant recognises that concepts such as "solastalgia" describe the distress some individuals may experience as a result of perceived environmental change. These concerns have been considered through the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment of mental wellbeing and equality-related impacts The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments.
KD-002	Landscape and Visual	Hedgerow screening	Ms Dyke stated that hedgerow screening is unrealistic because it would take at least 15 years to	The Applicant recognises that the proposed screening vegetation will take time to establish and does not assume that mitigation planting

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			establish and would not obscure an installation of this scale.	would provide immediate screening of the Proposed Development. Chapter 7 Landscape and Visual [APP-043] assesses effects at the relevant assessment years and takes account of the anticipated establishment and growth of mitigation planting over time. Year 1 operation assessed the worst case before the mitigation vegetation establish. The proposed landscape mitigation has been designed to reinforce the existing landscape structure through the retention and enhancement of hedgerows, woodland planting and other vegetation where appropriate. As planting matures, it would progressively filter and screen views of the Proposed Development, contributing to a reduction in visual effects over the operational life of the Scheme. The Applicant also notes that the purpose of mitigation planting is not necessarily to completely obscure all views of the Scheme. The objective is to integrate the Scheme into the receiving landscape, soften the appearance of built elements, and reduce the magnitude of visual change where practicable.
KD-003	Human Health	Green social prescribing	Ms Dyke stated that NHS England recognises tranquil, biodiverse spaces as preventative healthcare assets, and	The Applicant acknowledges the importance of access to green space for physical and mental wellbeing. The Equality Impact Assessment

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that enclosing Shotesham's PRow with 3.5m fencing would undermine green social prescribing.	(EqIA) [APP-214] assesses changes to PRow connectivity and recreational access. It identifies three new permissive paths that would improve access to green space, including a route through Sub-Site 8B linking Shotesham FP22 and Shotesham FP19. Existing PRow would be retained within open corridors with a minimum 15 m buffer from Scheme infrastructure, supported by landscape planting and screening. No evidence has been identified that Shotesham FP22 forms part of a formally prescribed green social-prescribing programme. Irrespective of whether the route is used for that specific purpose, the assessment has considered the relevant underlying pathways, including access to green space, physical activity, social participation, recreation and mental wellbeing. The potential effects associated with fencing, changes in visual experience and perceived enclosure should be read alongside the route-specific landscape, visual and access assessments.
KD-004	Human Health	Protections for residents	Ms Dyke stated that the Commitments Register (Revision 2) [AS-038] protects construction workers but not residents exposed to low-frequency noise and BESS fire risks.	The Applicant acknowledges the concern that the Commitments Register [AS-038] is perceived to provide protection for construction

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				workers but not for residents in relation to low-frequency noise and potential BESS fire risks. Potential effects on human health arising from operational noise, including low-frequency noise associated with the BESS and substations, have been assessed within the Human Health Summary Statement contained within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and the supporting noise assessment within ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. The assessment considered a worst-case operational scenario and concluded that predicted low-frequency noise levels at the worst-affected residential and educational receptors would remain below assessment criteria and methodology set out within section 12.5.20 to 12.5.60 of the ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. With embedded and additional mitigation secured through the Design Principles, Parameters and Commitments [APP-213] and the Outline Operational Environmental Management Plan [APP-197], residual noise effects are not significant. With regard to BESS fire risk, the Applicant has prepared an Outline BSMP [APP-200], which

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				sets out measures to reduce the risk of battery failure and to manage credible incident scenarios. The Human Health Summary Statement considers potential health pathways associated with a BESS fire, including exposure to smoke and contamination from firewater, and concludes that the likelihood of such an event is very low. The BESS would be located more than 100 metres from the nearest residential receptor and emergency arrangements are proposed to minimise any potential exposure to smoke. The Applicant therefore considers that potential effects on nearby residents associated with low-frequency noise and BESS fire risk have been appropriately assessed and mitigated through the design of the Scheme and the suite of secured management plans and commitments. The Human Health Summary statement contained within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] concludes that the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. The Applicant has prepared a Mental Health and Wellbeing Addendum

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level.

Table 2.20 Dr Emma Harrold

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
EH-001	General Matters	Cumulative and irreversible harm	Dr Emma Harrold, of Stoke Holy Cross, objected to the Scheme, citing cumulative and irreversible harm, and advocated rooftop solar instead of sacrificing productive farmland.	The Applicant notes this comment. In relation to the potential for rooftop solar as an alternative to the Scheme, please refer to the response provided at DH-004 of this document.
EH-002	Cultural Heritage	Pye Road (A140)	Dr Harrold stated that the Scheme bisects the historic Roman Pye Road (A140), after which it is named, and raised concerns regarding protecting the area's heritage.	The Applicant notes the comments and would like to refer to its response to Dr Harrold [RR-0519] in the Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012] under comment ID CUL-001, CUL-005, CUL-006 and CUL-029.
EH-003	Ecology and Biodiversity	Habitats and chalk streams	Dr Harrold raised impacts on streams, hedgerows, woods and wildlife, stating that surrounding land-use changes risk degrading the quality and flow of globally rare chalk streams.	The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212]. The mitigation hierarchy has been applied to avoid, mitigate or compensate, throughout the design process. Mitigation is secured through various management plans including the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161]. Mitigation in relation to pollution management for all phases of the Scheme is set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198].
EH-004	Soils and Agricultural Land	Decommissioning and food security	Dr Harrold stated that no credible evidence shows that decommissioning can be achieved effectively, which risks food security	Decommissioning and restoration will be controlled under the made Development Consent Order (Requirement 21 of the Draft DCO [AS-032]). Decommissioning can be timed to be carried out when soil conditions are suitable, which is set out in the Outline SRMP [APP-204]. Subject to suitable mitigation, decommissioning is therefore not anticipated to result in any effects greater than those during construction. The impacts on land quality from the decommissioning works will all be temporary. Agricultural land quality will be restored to a standard suitable for agricultural use, except for the National Grid Substation and Grid Connection Infrastructure, which remain in place.

Table 2.21 Stuart Shearer

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SS-001	Cultural Heritage	Setting of listed buildings	Stuart Shearer, of Old Hall Barn, Hawes Green, within a Grade II listed residential cluster beside Grade II* St Mary's Church and St Martin's ruins, cited the Barnwell Manor judgment and NPPF requirement for weight to be given to harm to the setting of listed buildings, and that the Applicant has not provided the clear and convincing justification required. He stated that 4.5m panels at Site 8, would be highly visible from historic footpaths around the homes and churches, and that Hawes Green is absent from Table 7.4's 21 viewpoints.	The Applicant notes that an assessment of historic landscape and heritage assets (including Conservation Areas and Listed Buildings) has been provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. As described in the Design Approach Document [APP-212], heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example, reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. The Applicant notes the Consultee's comments regarding the designated heritage assets at Hawes Green. Assessments were not taken forward for these assets as Hawes Green as it was considered that there would be no impact to the listed buildings' setting or significance by the Scheme. This is largely due to the intervening vegetation, buildings and topography combined by the diminishing effects of distance.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant considers that these assessments have been produced in line with the relevant legislation, planning policy and professional guidelines, and are considered to be robust and appropriate for the assessment of the Scheme. Hawes Green is located approximately 2.5 km from the nearest Scheme component. It has not been identified as a visual receptor for detailed assessment, therefore not included as a view location in table 7.4, as significant visual effects are considered unlikely due to the separation distance and the presence of intervening vegetation.
SS-002	Landscape and Visual	Errors in the visual assessment	Mr Shearer stated that ES Volume 3 Appendix 7.4 – Visual Baseline [APP-121] incorrectly identifies non-existent “Highfield Lodge”, a commercial holiday lodge, instead of Highfield House, a residence in the heritage cluster, and places it in Brooke over a mile away.	The Applicant has reviewed the data and confirms that Highfield Lodge, Hawes Green is identified as an ‘other receptor’ associated with Site 8. The Lodge is listed in Google Map as a Lodge business with review. Receptors within the Brooke Heritage Cluster associated with Site 9 are not individually identified; however, they are included within the receptor group described as “Properties on High Green (Brooke)”.
SS-003	Landscape and Visual	Effectiveness of screening	Mr Shearer stated that 3m screening in the valley bottom would be ineffective. He requested correction of the Highfield	The Applicant refers to its response to SS-001 and SS-003.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			errors, a topographical survey from St Mary's Church to Site 8 and an accompanied site inspection of Hawes Green.	The Applicant notes Mr Shearer's comments regarding the effectiveness of proposed screening within valley locations. Chapter 7 Landscape & Visual [APP-043] has been using site-specific survey work, consideration of local topography, landscape character, receptor sensitivity and professional judgement, in accordance with the agreed LVIA methodology. The assessment does not rely solely on assumed vegetation heights but considers the interaction of landform, existing vegetation, proposed mitigation and viewing context in determining likely effects. A topography Plan is presented in ES Volume 2, Figure 7.3 -Topography Plan [APP-068].

Table 2.22 John Clarke

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
JC-001	Public Rights of Way	Recreational routes	John Clarke, a Lodge Road resident for 49 years, questioned proposed construction routes. He stated that local lanes and paths—including the Boudicca Way National Trail, and Rebellion Way cycle route—are popular with walkers, cyclists and horse riders, and requested evidence that these uses were considered.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on users of local lanes, Public Rights of Way and recreational routes, including Boudicca Way. In accordance with the Institute of Sustainability and Environmental Professionals (ISEP) Guidelines for Environmental Assessment of Traffic and Movement, the effects of the Scheme on walkers, cyclists and horse riders were considered within ES Volume 1, Chapter 11 – Transport and Access (APP-047) . Where temporary restrictions to Public Rights of Way are required during construction, these would be managed in accordance with the Outline PRowPMP [APP-203] , including the provision of temporary diversions where appropriate.
JC-002	Cultural Heritage	Friends Meeting House	Mr Clarke stated that he lives in a Grade II listed building with historic burial grounds near Lodge Road, but no provision exists to survey or protect listed buildings before decision. He cited a planning appeal, farther from the property than the Scheme,	Listed buildings and their settings are assessed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] and have been produced in line with the relevant legislation, planning policy and professional guidelines, and are

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			dismissed by the Inspector with reference to the setting of the house.	considered to be robust and appropriate for the assessment of the Scheme. Where a designated heritage asset has been deemed to be sensitive to the Scheme, as described in the Design Approach Document [APP-212] , these have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example, reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. No designated heritage impact will be directly impacted and therefore there is no requirement for survey of individual assets.
JC-003	Site Inspections	Lodge Road	Mr Clarke invited the ExA to visit Lodge Road and his home, noting that Lodge Road was not included in the ExA's recent unaccompanied site inspection. The ExA asked the Applicant to add Lodge Road to the draft accompanied site inspection itinerary for DL1.	The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at Deadline 1. This has considered all requests for site visits and set out rationale behind their inclusion or exclusion.
JC-004	General Matters	Property values, lighting and noise	Mr Clarke asked the ExA to seek evidence on property-value loss; protection of dark skies from wildlife-triggered security lighting; and effects of ambient and construction noise and	<u>Construction Noise</u> The construction noise impacts and effects at NSR7 (Dwellings on Lodge Road) are presented within ES Volume 3, Appendix 12.2

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			security cameras on residents and wildlife.	- Noise Modelling and Calculations [APP-179]. The assessment indicates construction noise from Solar PV Piling equates to a low impact, which at a receptor with high sensitivity results in a minor adverse effect. <u>Operational Noise - Early Morning</u> The results of the assessment during the early morning period at NSR7 inclusive of mitigation are presented within the ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. The following results are noted at NSR7: • Rating level = 30 dB $L_{Ar,15minutes}$ • Background sound level = 34 dB $L_{Ar,15minutes}$ • Excess of rating level over background sound level = -4 dB • This results in a negligible impact, which at a high sensitivity receptor results in a negligible effect. <u>Operational Noise - Evening</u> The results of the assessment during the evening period at NSR7 inclusive of mitigation

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				are presented within the Evening Noise Assessment [EN0110014/EXAM/9.20]. The following results are noted at NSR7: • Rating level = 29 dB $L_{Ar,15minutes}$ • Background sound level = 34 dB $L_{Ar,15minutes}$ • Excess of rating level over background sound level = -5 dB • This results in a negligible impact, which at a high sensitivity receptor results in a negligible effect. Operational noise impacts and effects during other times of the day (i.e. during the daytime and night-time) are negligible with mitigation incorporated. 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 at this receptor location: • The overall sound level from the Scheme along the PRow will not exceed 55 dBA, and mitigated where practicable to not exceed 50d BA.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. <u>Property Values</u> In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]. <u>Lighting</u> Any new external lighting will be mounted horizontally, be directed downwards towards the intended area of illumination, and be orientated away from the compound boundaries. Luminaires with full-cut off optics and a zero upward light ratio (ULR) will be used to ensure no direct upward light is emitted. 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

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. <u>Security Cameras</u> Paragraph 4.3.29 of ES Volume 1 Chapter 4 The Scheme [APP-040] states 'Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of the Sites (illustrated on Image 4.15). It is anticipated that these would be galvanised steel poles and will be externally finished to be in keeping with the prevailing surrounding environment, with a maximum height of 3m, with the exception of the National Grid Substation which has a maximum height of 4.2m.

Table 2.23 Jane Andrews

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
JA-001	Landscape and Visual	Rural character and screening	Jane Andrews, born in Shotesham and a Topcroft resident for over 30 years, stated that unprecedented development would alter the area's distinctive rolling landscape and be visible from every village approach. She stated that hedging cannot screen undulating countryside, especially in winter, or protect long views.	The Applicant acknowledges the concern that vegetation and hedgerow will not be entirely effective in screening the Scheme at Site 8 due to landform. The Landscape and Visual Assessment (LVIA) presented within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with recognised professional guidance and has informed the iterative design process throughout the development of the Scheme. The Applicant considers the assessment to be robust, proportionate and appropriate for the scale and nature of the proposed development. With regard to design evolution, the Applicant draws attention to the fact that the design of the Scheme, including Site 8, has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of the siting of infrastructure, as set out in the Design Approach Document [APP-212]. Specific design responses relevant to Site 8 include the exclusion of solar PV panel

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				development within Sub-Site 8A and 8B in proximity to residential properties on Market Lane and Wash Lane and from Shotesham, and Ancient Woodland. Furthermore, a circa 20m offset of solar PV panel development within Site 8A and 8B when in proximity to PRowS, namely Shotesham FP19 and FP22, to reduce proximity of development, allow for sufficient space for landscape mitigation planting, and reduce potential effects to visual amenity for users of these routes. Landscape and visual mitigation measures for Site 8 are set out within the Green Infrastructure Strategy [AS-005] and the Outline LEMP [APP-199], which include the strengthening and reinforcing of existing hedgerows (infill planting, laying and coppicing) together with new tree and woodland planting to provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through Requirement 7 in the Draft DCO [AS-032].
JA-002	Ecology and Biodiversity	Red deer and mature oaks	Ms Andrews questioned fencing effects on established wildlife routes. She stated that saplings cannot replace	Habitat fragmentation and loss is considered in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] .

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			centuries-old oaks and any removal requires proper justification.	The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. The indicative alignment of perimeter fencing is shown on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the Draft DCO [AS-032]. The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [APP-017]. To confirm, the approach taken is as set out in the Design Principles, Parameters and Commitments [APP-213], The buffer zone applied for individual trees, groups of trees and non-Ancient Woodland: 15m. The buffer zone applied for Ancient Woodland: 30m. The buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater, in accordance with Natural England and the Forestry Commission 'standing advice'. There would be no loss of Ancient Woodland or veteran trees. Generally tree removals within the Order Limits has been avoided wherever possible. A 15m offset has been applied to all trees and woodland. However, to facilitate construction and implementation of the Scheme select and targeted tree removals are identified within ES Volume 2, Appendix 7.10 - Preliminary

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Arboriculture Impact Assessment [APP-150].
JA-003	Soils and Agricultural Land	Food security and alternatives	Ms Andrews stated that decades-long loss of productive farmland requires compelling justification when rooftops, car parks and new housing offer alternatives.	The use of domestic rooftop and commercial rooftop is part of the Solar Roadmap (DESNZ, June 2025) objectives. Figure 2 predicts that under the current policy scenario by 2030 production will be 60-65% by large-scale projects, 20% by domestic rooftop and 15-20% commercial rooftop and ground mount. In addition, the Applicant refers the respondent to comment ID ALT-011 in The Applicants Response to Relevant Representations Part 5 - By Theme [PDA-012].
JA-004	Environmental Assessments	Flooding, traffic and mitigation	Ms Andrews raised flooding, erosion and construction traffic and said mitigation of landscape, biodiversity and amenity harm remains unconvincing.	The potential effects of the scheme with regards to flood risk, erosion and construction traffic have been assessed and the effect presented within the ES [APP-036 to APP-195] . Mitigation has been identified in accordance with the mitigation hierarchy, drawing upon good practice guidance alongside the Applicant's experience in the development of solar schemes.

Table 2.24 Professor Anne Marie Minihihane

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
AMM-001	Soils and Agricultural Land	Food security	Professor Anne Marie Minihihane, Professor of Nutrition and Genetics at the University of East Anglia, stated that the UK imports 50% of its food, including 85% of its fruit. She cited the January 2026 Joint Intelligence Committee report, <i>Global Biodiversity Loss, Ecosystem Collapse and National Security</i> , identifying food supply as the UK's greatest vulnerability. She stated that about 20,000 acres of Norfolk solar land would generate around 3TWh annually (1% of UK demand), but the same land could produce about 2.5 billion fruit and vegetable portions (3% of annual consumption), and cited Steve Barclay's 2024 statement prioritising the best agricultural land for food production.	Food production and food self-sufficiency are considered in ES Chapter 15 – Soils and Agricultural Land [APP-051] . This includes analysis of how the land is farmed, and what the land is capable of producing. This is supplemented by ES Volume 3, Appendix 15.2 Farm Reports [APP-183] . The majority of the land within the Order limits is not suitable for, and is not, in fruit and vegetable production, as reviewed in ES Chapter 15 – Soils and Agricultural Land [APP-051] .
AMM-002	Transport and Access	AILs near property	Professor Minihihane, of Saxlingham Nethergate, stated that her property is opposite the war memorial, within one metre of Church Hill, and night-time AILs would pass about one metre from her bedroom.	The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in part three of ES Volume 3,

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendix 11.1 - Transport Assessment [APP-176] pages 58-60. The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. AIL management measures are set out in point 6.4 of the Outline CTMP [APP-201].
AMM-003	Public Rights of Way	Loss of Church Hill footway	Professor Minihane stated that removing the Church Hill footway, which links the village centre to the church, school, scout hut, playing fields and allotments, would force pedestrians, including schoolchildren, onto the road.	The Applicant can confirm that it is not proposed to remove the Church Hill footway. For further information on AIL movements please see the response to comment AMM-002 above.

Table 2.25 Richard Dunham

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
RD-001	Landscape and Visual	Setting of The Cedars	Richard Dunham stated that The Cedars, Stratton St Michael, is a Grade II listed 16th-century house adjoining Site 4, and the Scheme would surround the property on three sides. Mr Dunham stated that Scheme uncertainty had hindered the family's 14-month effort to sell The Cedars and asked who would bear any value loss.	The Applicant notes this concern. However, the Scheme would not surround The Cedars on three sides. The Scheme elements associated with Site 4 would be located only to the north of The Cedars. Land to the east of the property forms part of the proposed Community Space and landscape mitigation area and would not contain solar PV infrastructure. The nearest solar panels to the north would be located over 100m from the property. In addition, a proposed woodland planting belt is proposed between The Cedars and the Scheme infrastructure to provide landscape integration and screening over time. Detail of the landscape mitigation is presented in the Green Infrastructure Strategy [AS-005]. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant's Book of Reference [APP-022] includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. This is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
RD-003	Site Inspections	Cedars Cluster	Mr Dunham requested an ExA visit to the "Cedars Cluster" (The Cedars, Tumbrel Barn and Dairy Barn), offered access and confirmed his existing inspection request [PDA-032] .	The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at Deadline 1. This has considered all requests for site visits and set out rationale behind their inclusion or exclusion.

Table 2.26 Martin Wilkinson

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MTW-001	Planning Process	Generic assessment	Martin Wilkinson stated that application responses are largely generic and lack site-specific detail, especially beyond the main panels and BESS. Mr Wilkinson stated that identifying a type of mitigation does not show that impacts are understood or addressed, and combined effects remain unassessed. He asked the ExA to test whether the ES and management plans demonstrate mitigation and cumulative assessment, and where the record of the Applicant's site visits and observations can be found.	The proposed management and mitigation measures are set out in the ES [APP-036 to APP-195] and are secured through various outline management plans [APP-196 to APP-205]. The specificity of the outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032] . The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032] . Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement.
MTW-002	General Matters	Lessons from operational solar	Mr Wilkinson asked where operational UK solar experience has informed proposed landscaping, planting, ecology, PRow and drainage	The Applicant has an extensive team of subject matter experts mentioned, whose expertise has been informed by experience on a wide range of infrastructure projects that includes operational solar farms. The Applicant directs

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			mitigation, including lessons from successes and failures.	the interested party to the Statement of Expertise [APP-112] which goes into further detail.

Table 2.27 Mauricette Wilkinson

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MAW-001	Socio-Economics	Landscape, property and tourism	Mauricette Wilkinson stated that the Scheme would enclose attractive Norfolk villages, cause years of construction upheaval, reduce property values, harm businesses and tourism, including use of the Boudicca Way.	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry. The Applicant does not therefore consider that there will be significant adverse effects on the local tourism industry.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Moreover, for skills and the labour market, a Moderate Beneficial impact – which is significant in EIA – is assessed for all three phases. This is shown in Table 14.4 of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]. The Applicant notes that a short section of the Boudicca Way would be subject to a temporary closure, anticipated to be for a matter of weeks, to facilitate the construction of Cable Route Corridor 4. Following completion of these works, the route would be reinstated and fully reopened. The Proposed Development would not result in any permanent closure or loss of access to the Boudicca Way. Further information on the management of temporary Public Rights of Way closures and diversions is provided within the Outline PRowPMP [APP-203].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MAW-002	Ecology and Biodiversity	Publicly funded habitats	Ms Wilkinson stated that public funding has created endangered-species habitats across many affected areas.	The likely effects on ecology and biodiversity, including any areas previously created or enhanced for wildlife are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with any required mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212]. The mitigation hierarchy has been applied to avoid, mitigate or compensate, throughout the design process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161].
MAW-003	Soils and Agricultural Land	BMV land and alternatives	Ms Wilkinson stated that including BMV land conflicts with the Solar Roadmap and asked the ExA to ensure all lower-grade alternatives were considered. She cited solar windows, fencing and rooftops as alternative technologies.	The land quality of the land within the Order Limits is set out in ES Chapter 15 – Soils and Agricultural Land [APP-051] and the ES Appendix 15.1 - Agricultural Land Classification [APP-182]. Chapter 15 sets out an assessment of the likely significant effects on land quality and includes an assessment of the policy, national and local implications for

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				food production and food security (for which there is no policy). Government's position is that the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly. This will all need to be considered by the ExA. The use of domestic rooftop and commercial rooftop is part of the Solar Roadmap (DESNZ, June 2025) objectives. Figure 2 predicts that under the current policy scenario by 2030 production will be 60-65% by large-scale projects, 20% by domestic rooftop and 15-20% commercial rooftop and ground mount. In addition, see the Applicants response to JA-003 above.
MAW-004	Public Rights of Way	Equestrian routes	Ms Wilkinson stated that bridleway closures and construction traffic on lanes would affect her as an equestrian. She said a compound is proposed at the foot of her private drive, part of the Boudicca Way byway, and would significantly affect the opposite bridleway.	The interaction between the Scheme and the PRow network has been assessed within ES Volume 1, Chapter 11 -Transport and Access [APP-047] and the Outline PRowPMP [APP-203] . The assessment considered the effects of construction traffic, temporary PRow closures, diversions and managed crossings on users of the PRow network.

Table 2.28 Cllr Kay Mason Billig

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
KMB-001	General Matters	Disproportionate burden on Norfolk	Cllr Kay Mason Billig, a county, district, town and parish councillor representing areas including Brooke and Seething and former NCC Leader, supports renewable energy but opposed Norfolk bearing a disproportionate infrastructure burden. They stated that the Scheme, Norwich to Tilbury and other projects would industrialise the countryside without clear direct benefit to Norfolk homes or businesses.	The Applicant notes this comment.
KMB-002	Transport and Access	Road damage and congestion	Cllr Mason Billig stated that years of construction traffic on unsuitable rural roads would create noise, congestion and disruption and leave damaged roads and infrastructure.	The Applicant acknowledges the concerns raised regarding the suitability of local roads and the potential effects of construction traffic on the highway network. The effects of the Scheme, including construction traffic, have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]. A pre-construction road condition survey will be undertaken on the LRN using video recording or photography prior to the commencement of construction activities. The geographical scope, extent and timing of the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				survey will be agreed with the LHA. A post-construction survey will also be carried out to identify any additional defects that can reasonably be attributed to construction traffic associated with the Sites. Any highway defects identified as resulting from construction activities will be rectified to the satisfaction of the LHA without any betterment to the pre-construction condition. Construction traffic would be managed in accordance with the Outline CTMP [APP-201], which includes measures to manage construction traffic and minimise effects on highway users, where reasonably practicable.
KMB-003	Battery Safety	Fire service resources	Cllr Mason Billig stated that battery storage requires specialist Norfolk Fire and Rescue Service planning, training and response, whose costs should be fully developer-funded rather than borne by taxpayers. She confirmed she had spoken at length with the Chief Fire Officer.	The Outline BSMP [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The Outline BSMP [APP-200] identifies how the Applicant will use good industry practice to reduce risk to life, property and the environment from the BESS. By way of a Requirement 6 of the Draft DCO [AS-032] prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and Rescue Service and the Environment Agency. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally. The battery safety management plan must be implemented as approved.
KMB-004	Soils and Agricultural Land	Decommissioning and restoration	Cllr Mason Billig questioned the environmental footprint of manufacturing, transporting, replacing and disposing of panels, and who would guarantee soil condition and adequate decommissioning funds after 60 years.	The Applicant has set out measures that will apply during the construction phase in its Outline CEMP [APP-196] and the Outline CTMP [APP-201] which are each secured by the Draft DCO [AS-32]. This includes commitments in relation to manufacturing and transporting such as "<i>Vehicles will be correctly maintained and operated in accordance with manufacturer's recommendations and in a responsible manner</i>". The Applicant has set out measures that will apply during the operational and maintenance phase in its Outline OEMP [APP-197] and the Outline OTMP [APP-202] which are each secured by the Draft DCO [AS-32]. This includes provisions in respect of panel replacement. For example, section 12.12 sets out a replacement programme.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has set out the decommissioning measures in the Outline DEMP [APP-198] which is secured by the Draft DCO [AS-32]. Suitable provisions are therefore in place to secure legally binding mechanisms at all phases of development. Soils will benefit from being rested from intensive arable production, as described in ES Chapter 15 – Soils and Agricultural Land [APP-051]. The soils will not be adversely affected by the construction, operation and decommissioning, as described in Chapter 15 and the Outline SRMP [APP-204].
KMB-005	Ecology and Biodiversity	Barbastelle bats	Cllr Mason Billig noted that barbastelle bats had halted the Norwich Western Link following Natural England's objection, and stated that the same rigorous standards must be applied to energy projects.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the Core Sustenance Zones (CSZ's) of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Commitments [APP-213] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits with habitat creation undertaken within these buffer zones. These measures will reduce the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and provide enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status. Natural England in their role as a statutory consultee has raised no objection in relation to potential impacts to barbastelle bats.

Table 2.29 Mark English

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ME-001	Ecology and Biodiversity	Biodiversity claims	Mark English asked the ExA to examine the risk of fire originating off site and spreading into the installations, and how the Applicant would protect the installations while delivering its biodiversity commitments. Mr English stated that the land already supports significant biodiversity and questioned the Applicant's biodiversity claims, noting that the images at items 4.1 and 4.2 of the ES Non-Technical Summary [APP-194] show a more barren landscape. He stated that dry grassland and vegetation would increase fire risk and questioned whether the promised biodiversity would materialise.	Please refer to the Applicants response at KT-003 in respect of BESS safety. The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with mitigation measures. The majority of the Order Limits comprise intensively managed arable land, with higher value habitats concentrated in linear features such as hedgerows, which have been retained, where feasible. The Green Infrastructure Strategy [AS-005] details the proposed landscape and ecological measures which are to be implemented, with further prescriptions and management of ecological measures set out in the Outline LEMP [APP-199]. This is secured by Requirement 9 of the Draft DCO [AS-032] and so non-compliance is an offence. Figures 4.1 and 4.2 within the ES Non-Technical Summary [APP-194] show the type of infrastructure which is to be installed and do not show indicatively or otherwise, the landscaping which is to be created.

Table 2.30 Olive English

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
OE-001	General Matters	Scale and disruption	Olive English, a resident of Saxlingham Nethergate for over 70 years, stated that the Scheme is too large and disruptive. She had written to the Prime Minister and the Secretary of State for Energy Security and Net Zero objecting to the Scheme. Ms English stated that the Scheme would take part of the war memorial, where Remembrance services and Christmas carols are held, and would require demolition of the listed garden wall belonging to the listed rectory.	The Applicant acknowledges this. It is the decision of the Secretary of State for Energy Security and Net Zero whether or not to grant consent for the Scheme.
OE-002	Human Health	Access to green space	Ms English stated that people need green space for their mental health, particularly with hundreds of new homes being built nearby.	The Applicant acknowledges the importance of access to green space for mental health and wellbeing, particularly in the context of housing growth and increasing demand for opportunities for outdoor recreation. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that access to nature, recreation and opportunities for physical activity are important determinants of health and wellbeing. It also identifies that landscape character, visual amenity and connection to the local

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				environment can contribute positively to mental wellbeing. The Scheme includes measures to maintain and enhance public access to the countryside. No permanent Public Rights of Way closures are proposed and three new permissive paths would be provided, improving connectivity with the wider PRow network and creating additional opportunities for recreation and access to green space. These measures are secured through the Outline PRowWPPMP [APP-203], Outline LEMP [APP-199] and Design Principles, Parameters and Commitments [APP-213]. The Equality Impact Assessment [APP-214] recognised that these enhancements could provide health and wellbeing benefits through improved opportunities for access to nature, recreation and active travel. Taking account of the proposed mitigation and enhancement measures, the Human Health Summary Statement and Equality Impact Assessment do not identify likely significant adverse effects on population health or wellbeing arising from access to green space.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level.
OE-003	Alternatives and Energy Need	Alternative energy sources	Ms English described alternatives, including solar panels on all new-build houses, and noted existing energy infrastructure such as Sizewell nuclear power station and offshore wind turbines.	The Applicant refers to its response to representation ID CJC-014, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010], which explains that large-scale solar schemes are required to achieve net zero and that smaller scale solar, including rooftop

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				solar, must be considered as additional to, as opposed to instead of, larger-scale solar schemes.

Table 2.31 Sue Laws

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SL-001	Human Health	Stress and uncertainty	Sue Laws, a Great Moulton resident whose property adjoins the proposed National Grid substation at Site 1, stated that the Scheme has caused stress, sleep loss and anxiety among residents, and emphasised that her retirement savings are invested in her home Ms Laws requested that the ExA visit her property to see the relationship with the proposed substation.	The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at Deadline 1. This has considered all requests for site visits and set out rationale behind their inclusion or exclusion. The seriousness of concerns raised regarding stress, anxiety, sleep disturbance and uncertainty associated with the Scheme are acknowledged by the Applicant, including concerns relating to the proximity of the proposed National Grid Substation to residential properties and the importance of homes as both places of residence and financial assets. Potential effects on wellbeing associated with landscape and visual change, noise, traffic, access and recreation have been considered within the ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Human Health Summary Statement recognises that large-scale infrastructure projects can affect wellbeing through pathways such as perceived environmental change, disruption,

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				uncertainty and concerns regarding potential risks. However, the assessment concludes that, with mitigation in place, the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. In response to feedback relating to mental health of existing residents an assessment of mental wellbeing and equality-related impacts was undertaken through the Equality Impact Assessment [APP-214]. The EqlA considered issues raised during consultation relating to visual amenity, attachment to place, access to nature, neighbourhood character and concerns regarding housing values. Whilst recognising that such matters may affect individuals differently, particularly older people and those with existing vulnerabilities, the assessment concluded that significant negative equality impacts are unlikely at a population level. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum consolidates and provides further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the assessments submitted with the Application. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments. In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012].
SL-002	Public Rights of Way	Horse riding safety	Ms Laws stated that horse riding on local lanes would become unsafe due to construction vehicles, industrial noise	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on horse riders using local

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and security fencing. In response to a question from the ExA, she confirmed that she rides on both carriageways and bridleways.	roads and Public Rights of Way. Construction traffic routes and associated transport effects have been assessed within ES Volume 1: Chapter 11 – Transport and Access [APP-047] . Where bridleways pass through or adjoin the Scheme, a minimum stand-off distance of 15m is maintained between Public Rights of Way and solar infrastructure. Where temporary restrictions to Public Rights of Way are required during construction, these would be managed in accordance with the Outline PRowPPMP [APP-203] . Construction traffic would also be managed in accordance with the Outline CTMP [APP-201] .

Table 2.32 Patricia Leate

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
PL-001	Transport and Access	Width of Church Hill	Patricia Leate, of Saxlingham Nethergate, stated that Church Hill is too narrow for AILs, and that two-way traffic already causes regular problems. Ms Leate displayed photographs illustrating these problems. In response to a question from the ExA regarding bus frequency, Ms Leate indicated approximately one bus every three hours, adding that large lorries cause the same problems. Ms Leate stated that AILs and HGVs could cause vibration damage to older properties without foundations and to infrastructure beneath the road, including a sewer at the top of Church Hill which has leaked previously and is believed to be made of asbestos. Ms Leate requested that the ExA visit Church Hill early in the Examination and undertake a risk assessment, and asked that Church Hill be removed from the Scheme and an alternative AIL and HGV route planned.	The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's Initial Written Questions [EXAM/9.2]. AIL management measures are set out in point 6.4 of the Outline CTMP [APP-201]. An assessment of construction traffic vibration is presented within Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. At distances of approximately 10 m or more, the vibration level is expected to be 1 mm/s PPV or below during HGV passbys, which is below the Significant Observed Adverse Effect Level (SOAEL). High sensitivity receptors which are 10 m or more away from access roads would therefore experience short-term negligible to minor adverse effects, which are not significant. Based on traffic data obtained at ATC6 and ATC7 as reported within ES Volume 1, Chapter 11 - Transport and Access [APP-047], a number of rigid vehicles with four or more axles or articulated lorries passed along The Street and Broaden Lane during the traffic survey. Properties which front these roads are

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				therefore already likely to be exposed to comparable levels of vibration which would be generated by AIL required for the Scheme.
PL-002	Public Rights of Way	Church Hill footway	Ms Leate stated that the only footway on Church Hill is used by many locals, and that its safety is critical given the absence of street lighting in the conservation village.	The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's Initial Written Questions [EXAM/9.2] .
PL-003	Transport and Access	Orchard View Barn access	Ms Leate stated that vehicle access onto Church Hill from the Orchard View Barn courtyard, which serves three properties, is already dangerous and would be made worse by the Scheme.	The Applicant can confirm that Church Hill is not proposed as a route for general construction vehicles. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses to the Examining Authority's Initial Written Questions [EXAM/9.2] .

Table 2.33 Margaret Stone

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MS-001	Needs	Industrialisation and sense of community	Margaret Stone, a Hempnall resident and former Great Moulton resident, stated that arbitrary net zero timescales should not come at the expense of centuries-old villages and countryside and destroying their sense of community.	The Applicant's Statement of Need [APP-206] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 & 2.10.2), and that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1 (2025) Para 3.3.23). This is because "Solar farms can be built quickly" (NPS EN-3 (2025) Para 2.10.6) so are well placed to meet the urgent need identified in NPS EN-1. Further, "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" (NPS EN-3 (2025) Para 2.10.5). Paragraph 4.2.16 of NPS EN-1 establishes that there is a critical national priority for low carbon infrastructure, including for large-scale solar farms, because of the decarbonisation, energy

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				security, and affordability benefits that they deliver. The Applicant acknowledges that the Scheme would introduce effects on the local community. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case.
DC-001	Socio-Economics	Sale of property and compensation	Dawn Chrystal, speaking on behalf of her late father, described difficulties in selling their house at the top of Church Road, and asked who would compensate residents for loss of property value and effects on mental health.	In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]. The Applicant acknowledges that concerns have been raised regarding effects on wellbeing and mental health associated with the Scheme. However, the statutory compensation regime is limited and does not provide compensation for concerns about potential future impacts and perceived effects on wellbeing.
DC-002	Alternatives and Energy Need	Alternative locations	Ms Chrystal suggested that solar could instead be sited alongside dual carriageways.	The Applicant refers to its response to representation ID CJC-014, submitted in The Applicants Response to Relevant Representations Part 3 - Other Statutory

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Bodies, Undertakers and Notable Parties [PDA-010] , which explains that large-scale solar schemes are required to achieve net zero and that smaller scale solar, (which would include solar sited along dual carriageways as well as other community-based smaller schemes), must be considered as additional to, as opposed to instead of, larger-scale solar schemes.

Table 2.34 Richard Snowden

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-001	General Matters	Permanence of infrastructure	Richard Snowden, a Great Moulton resident, stated that key parts of the National Grid infrastructure, access arrangements and associated mitigation are likely to remain well beyond 60 years and should be assessed as permanent. He requested clear evidence on what infrastructure would remain, for how long, and why a permanent crossing of Hundred Lane (RB19), a historic and well-used restricted byway, is necessary.	The Applicant confirms that the National Grid Substation has been assessed as permanent infrastructure in the ES. The remaining components of the Scheme will be decommissioned at year 60, the end of the operational period in accordance with the Outline DEMP [APP-198] as secured by the Draft DCO [AS-032]. The Applicant notes the comments regarding the permanent crossing of Great Moulton RB19 (Hundred Lane). No permanent closures or diversions of Public Rights of Way are proposed as part of the Scheme. Public Rights of Way affected during construction would be managed in accordance with the Outline PRowPPMP [APP-203], including the provision of temporary diversions where required. Following construction, Public Rights of Way would be reinstated and returned to use. The permanent crossing point on Hundred Lane is required for maintenance vehicles and also as a secondary access route for emergency vehicles for the BESS site. The crossing point is subject to detailed design taking into account the nature of Hundred Lane as a restricted byway.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
RS-002	Alternatives and Energy Need	National Grid substation site selection	Mr Snowden stated that the National Grid substation location (Site 1B, option 4B) appears to have been chosen primarily for grid proximity and deliverability, which is not a substitute for a robust comparison of alternatives. He noted that Site 1B is a sensitive location, with nearby homes, PRow, heritage assets, rural lanes, private water supplies and Grade 2 BMV land.	The Applicant refers to response SM-002 within this document.
RS-003	Design	Substation design alternatives	Mr Snowden asserted that the Applicant has not assessed design alternatives for the substation and should compare air insulated switchgear with potentially lower-impact gas insulated switchgear. He stated that mitigation after site selection is not sufficient to demonstrate that avoidable harm has first been minimised through siting and design.	The Applicant has given consideration to both air insulated and gas insulated switchgear in the ES using a reasonable worst case scenario approach. Where optionality exists, in this case air or gas insulated switchgear, each topic within the ES would assess the alternative that is most likely to have an adverse effect. This is to ensure the final siting and design effectively mitigates the likely significant effects as far as practicable. These measures are detailed in the management plans such as the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198] and Outline LEMP [APP-199].
RS-004	Consultation and engagement	Consultation and combined assessment	Mr Snowden stated that consultation and visual information have been inadequate, and that the grid connection, battery storage,	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			substations, access works and overhead line changes should be assessed together. He asked the ExA to require further evidence before considering the Applicant's case further.	Planning Act 2008 (PA2008), the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The acceptance of the Applicant's DCO application for Examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. Each of the host and neighbouring authorities provided adequacy of consultation representations [AoC-001 to AoC-008], confirming that they considered the Applicant met the statutory requirements. The Applicant acknowledges these comments but remains confident that information made available during the consultation was adequate and appropriate for that stage in the process. The Environment Statement assesses all aspects of the scheme together, including grid connection, battery storage, substations, access works and overhead line changes, as described in ES Chapter 4 – The Scheme [APP-040].

Table 2.35 Dr Gillian Pyke

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
GP-001	Soils and Agricultural Land	Food security	Dr Gillian Pyke, resident of Great Moulton, raised concerns about the loss of prime agricultural land at a time of international political and climate uncertainty.	The land quality of the land within the Order Limits is set out in the ES Chapter 15 – Soils and Agricultural Land [APP-051] and the Agricultural Land Classification [APP-182] . Chapter 15 sets out an assessment of the likely significant effects on land quality. Chapter 15 includes an assessment of the policy, national and local implications for food production and food security (for which there is no policy). Government's position is that the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly. This will all need to be considered by the ExA.
GP-002	Ecology and Biodiversity	Biodiversity and pollinators	Dr Pyke stated that the Scheme would run counter to the Government's commitments to halt and reverse biodiversity loss, citing BBC Springwatch on the number of species a single mature oak can host. She asked how the Scheme would affect crop pollinators and yields.	The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] , together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212] . The mitigation hierarchy has been applied to avoid, mitigate or compensate, throughout the design

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161]. In relation to habitat loss and wildlife displacement, the majority of the Order Limits comprise intensively managed arable land, with higher value habitats concentrated in linear features such as hedgerows, which have been retained, where feasible. The increased biodiversity as a result will have a positive effect on crop pollinators for the wider area.
GP-003	Battery Safety	Wildfire and firefighting provision	Dr Pyke referred to this summer's wildfires and asked whether surrounding agricultural land now poses a fire risk to the installations. She questioned whether the proposed water-based firefighting provision is appropriate for electrical fires.	Please refer to the Applicants response at KT-003.
GP-004	Alternatives and Energy Need	Rooftop solar	Dr Pyke stated that solar should be located on roofs as an alternative to the Scheme.	Non-BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the Site Selection Assessment [APP-215] , which considers potential for non-BMV alternative sites identified

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through desktop mapping to accommodate the Scheme. As set out in the Statement of Need [APP-206], while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. During the design evolution of the Scheme, consideration was given to reducing the impact on BMV quality land, as far as practicable, as described in the Design Approach Document [APP-212]. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. In accordance with the Outline SRMP [APP-204] that includes measures to manage soils as a resource and minimise adverse impacts, a detailed SRMP will be submitted to and approved by the relevant planning authority, as secured by a Requirement 18 in the Draft DCO [AS-032].

Table 2.36 Elizabeth Rose

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ER-001	Transport and Access	Suitability of Lodge Road	Elizabeth Rose, a resident of Lodge Road, stated that Lodge Road is unsuitable for its intended use. Ms Rose stated that the road is proposed as a two-way route but is single-track, with no pavements, narrow verges and a carriageway of around 2.7m, below the 3m minimum advised for HGVs and the 3.5m recommended as good practice. She requested swept path diagrams, noting that the road includes roadside nature reserves and deep drainage.	Lodge Road is identified as a construction access route to reach access A06. A06 is a contingency access for works to CRC2. The priority would be to use access A02 on B1134. Subject to detailed design and the final sequencing of works in the BESS site and 1B it was considered prudent to provide an alternative option. The use of A06 and Lodge Road is subject to further dialogue with NCC.
ER-002	Transport and Access	Need for Lodge Road access point	Ms Rose stated that the indicative access point on Lodge Road connects only to a section of the cable route corridor which does not itself connect to other infrastructure, and asked for this to be reviewed. In response to a question from the ExA, Ms Rose confirmed that she had already submitted a site inspection request. Ms Rose also asserted that HGV use would compromise the only route in and out for residents and farms, with no contingencies proposed. She noted	Lodge Road is identified as a construction access route to reach access A06. A06 is a contingency access for works to CRC2. The priority would be to use access A02 on B1134. Subject to detailed design and the final sequencing of works in the BESS site and 1B it was considered prudent to provide an alternative option. The use of A06 and Lodge Road is subject to further dialogue with NCC.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that other routes, such as Fairstead Road, had been assessed as inappropriate, and asked that Lodge Road be given the same consideration.	

Table 2.37 Gillian Marklew-Allen

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
GMA-001	Design	Good design	Gillian Marklew-Allen, of Grove Farm House, Lundy Green, Hempnall, stated that Land Parcel 3 would surround her home on two sides. She referred to a Planning Inspectorate webinar held on 13 December 2024, <i>Webinar 2: Achieving good design in NSIPs</i> , and stated that the Scheme does not meet the principles of good design discussed.	The Applicant acknowledges this concern. However, the Applicant does not consider that the Scheme would surround Grove Farm House. The property is located approximately 130m from the Scheme elements within Site 3 to the east and approximately 410m from the nearest Scheme elements to the south. The southern solar PV area is separated from the property by an intervening field. While Scheme infrastructure would be present in two directions, the Applicant does not consider that the extent, separation distances, and intervening land use would result in the property being surrounded by the Scheme. Proposed landscape mitigation includes enhanced hedgerow planting with trees along the eastern boundary and a linear tree belt between Grove Farm House and the Scheme elements, which would assist with landscape integration and visual screening as the planting matures. Detail of the landscape mitigation is presented in the Green Infrastructure Strategy [AS-005]. The proposed implementation, management and monitoring of the landscape during

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032] . Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198] , respectively via the Draft DCO [AS-032] .
GMA-002	Human Health	Access to countryside and noise	Ms Marklew-Allen stated that enclosing footpaths with fencing and introducing background noise from tracker panel motors would cause widespread distress.	The Applicant recognises the concerns raised regarding the potential effects on wellbeing associated with changes to the experience of Public Rights of Way (PRoW), including the perception of enclosed routes and concerns regarding operational noise from tracker panel motors. Potential effects on health and wellbeing associated with access, recreation, visual amenity and perceptions of safety have been considered within the ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Human Health Summary Statement acknowledges that access to recreational routes, opportunities for physical activity, and connection to the local environment are important determinants of wellbeing. The Outline PRoWPPMP [APP-203] provides a framework to ensure that PRoW, promoted

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				walking routes and permissive paths remain open and safe to use throughout the construction, operational and decommissioning phases of the Scheme where possible. Where continued access cannot be maintained during a particular construction activity, the Outline PRowPPMP identifies the process for temporary management, diversion, notification and reinstatement. The Human Health Summary Statement concludes that accessibility to communities and services, opportunities for active travel and recreation, and perceptions of safety are expected to be maintained at levels that do not materially affect physical or mental wellbeing. With regard to operational noise from tracker panel motors, this has been assessed within the operational noise assessment contained within ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. The assessment concluded that predicted sound levels from tracking motors at nearby receptors are substantially below background sound levels and do not contribute materially to overall operational noise. As such, effects from tracking motors are assessed as negligible and not significant.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Overall, with embedded mitigation and management measures in place, the Human Health Summary Statement concludes that the Scheme is not expected to give rise to significant noise effects on human health and would not result in any likely significant adverse effects on population and human health during construction, operation or decommissioning. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments.
GMA-003	Alternatives and Energy Need	Brownfield land	Ms Marklew-Allen stated that the Applicant had told her at the first consultation event in Hempnall that it had not sought brownfield land, and asked the ExA to recommend refusal on that basis. She invited the ExA to visit her home.	Previously developed land, including brownfield land, was considered during site selection, as reported in the Site Selection Assessment [APP-215]. The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at Deadline 1. This has considered all requests for site visits and set out rationale behind their inclusion or exclusion.

Table 2.38 Victoria Chandler

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
VC-001	Planning Process	Participation and response to representations	Victoria Chandler, a Morningthorpe resident, stated that, despite registering and confirming her wish to speak, she had twice been omitted from the open floor hearing agenda. Ms Chandler noted that the Applicant had submitted a 968-page themed response to relevant representations [PDA-012] 11 days before the hearing, and stated that she would make written submissions.	The Applicant notes this comment and welcomes further written submissions from Ms Chandler.
VC-002	Land and Rights	Category 3 status	Ms Chandler stated that she lives immediately beside Site 5, with her garden around 11m from the Order limits and her driveway between construction accesses A23 and A24 on the B1527, and questioned why she has not been treated as a Category 3 person.	The Applicant has provided a response to comments raised by the Respondent on Category 3 interests. The Applicant therefore refers to its response to comment ID MC-PDA-001 in The Applicant's Response to Procedural Deadline A and Additional Submissions [EN0110014/EXAM/9.2] .
VC-003	Noise and Vibration	Construction effects and substation	Ms Chandler stated that her family would face at least two years of noise, dust, vibration, HGVs and abnormal loads six days a week, affecting her home, workplace and family life.	The proposed vehicle routeing is indicated within ES Volume 2, Figure 11.2 – Likely and Suitable Routes to the Scheme [APP-095] . This figure indicates that vehicle routing is anticipated to be a significant distance from Morningthorpe. As such, this location sits outside of the study area and is expected to

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				experience negligible impacts and effects due to construction noise and vibration.
VC-004	Water Environment	Private borehole	Ms Chandler stated that her borehole near to Site 5 was not included in the assessment dataset, and that investigation is proposed only after consent.	Sources of Potential Contamination (SPCs) that could be mobilised by the construction of the Scheme have not been identified within the boundary of Site 5, as shown on ES Volume 2, Figure 16.3 - Sources of Potential Contamination [APP-107]. The assessment of risks to abstractions (including Private Water Supplies (PWS)) presented within the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] has been undertaken on the basis of the available information, as provided by the BGS (water wells), the Environment Agency (permitted abstractions) and South Norfolk Council (private water supplies registered with South Norfolk Council pursuant to the provisions of the Private Water Supply Regulations 2016. It is recognised that the Respondent's borehole is not within the dataset. The geology overlying the chalk in this area comprises Diamicton, which is predominantly cohesive and as shown on ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108] extends to in excess of 6m in Site 5. It is recognised that the composition of Diamicton

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				can be variable, however a laterally or vertically extensive groundwater body is not anticipated to be present. Nonetheless, ground investigation will be undertaken post-consent to confirm the assumptions made. In conclusion, risks to the PWS within the Study Area around Site 5 have not been identified as: • The PWS abstract from the chalk or crag at depth beneath the overlying Diamicton. • Ground investigation will be undertaken, with the design of the Scheme informed by the results of the ground investigation. SPC which could be mobilised by ground disturbance during construction of the Scheme in Site 5 have not been identified.
VC-005	Cultural Heritage	Historic wall	Ms Chandler stated that a free-standing historic wall over 200 years old, forming part of the former manor, lies close to the Order limits and has not been considered in the vibration assessment.	The Applicant notes the comments made regarding vibration effects on the historic wall. The publication <i>Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from groundborne vibration</i> (British Standard BS7385- 2:1993) states in paragraph 7.5.2 that “a building of historical value should not (unless it is structurally unsound) be assumed to be more sensitive”, and as such, the conclusions of the noise and vibration assessment (see ES Volume 1,

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Chapter 12 – Noise and Vibration [APP-048]) apply regardless of a building's designation or otherwise.
VC-006	Planning Process	Accessibility	Ms Chandler stated the Examination must be more accessible to all those affected.	The Applicant's community relations team are available to provide accessibility support during the examination proceedings. Further accessibility measures will be undertaken by the Planning Inspectorate as part of the broader remit of chairing the Examination proceedings.

Table 2.39 Cllr Margaret Thomas

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
MT-001	Human Health	Cumulative mental health effects	Cllr Margaret Thomas, County Councillor for West Depwade, stated that residents in her division are showing signs of distress, anxiety and confusion and feel shut out of the process. Cllr Thomas reported that some residents had described experiencing suicidal thoughts.	The Applicant acknowledges the concerns raised by Cllr Margaret Thomas regarding reported distress, anxiety, confusion and feelings of exclusion among residents, and recognises the seriousness of reports that some individuals have experienced suicidal thoughts. These accounts will be treated as relevant qualitative evidence in the Mental Health and Wellbeing Addendum, alongside the environmental assessment, consultation evidence and available population-health information. The Addendum will consider whether the reported concerns indicate a broader pathway or distributional effect requiring additional mitigation, engagement or monitoring. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that large-scale infrastructure projects may affect wellbeing through pathways including uncertainty, perceived environmental change, disruption and concern about potential risks. Mental health and equality-related effects were also considered in the Equality Impact

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Assessment [APP-214], using a Mental Health and Wellbeing Impact Assessment framework. This considered access to nature, visual amenity and attachment to place, perceived safety, participation and social inclusion, cumulative impacts, and concerns relating to housing and business values. The assessment acknowledges that individual experiences may vary but assesses effects at a population level and does not provide a clinical assessment of individual mental health. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments.
MT-002	Human Health	Health and wellbeing assessment	Cllr Thomas stated that the Applicant has produced no comprehensive impact or risk assessment of the cumulative and long-term effects of stress on residents, with each element assessed in isolation. She also stated that residents had felt intimidated by the Applicant's land ownership enquiries.	The Applicant recognises the concerns raised regarding the potential cumulative and long-term effects of stress, anxiety and uncertainty associated with the Scheme, and the view that these matters have not been assessed in a comprehensive or integrated manner. Potential effects on wellbeing associated with landscape and visual change, noise, traffic, access, recreation, air quality and other environmental factors have been considered within the ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Human Health Summary Statement was specifically prepared to bring together health-related considerations reported across the Environmental Statement and to provide an overview of potential pathways through which the Scheme could affect physical and mental wellbeing, rather than considering topics solely in isolation.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Human Health Summary Statement was prepared to integrate the health implications of changes reported across the ES technical assessments. It considered whether multiple changes could act on the same communities or vulnerable groups and whether their combined influence could alter the population-health conclusion. The assessment of cumulative effects within the Human Health Summary Statement is presented in section 18.6.232 to 18.6.249. In response to consultation feedback relating to stress, uncertainty, perceived environmental change and concerns regarding potential risks, an assessment of mental wellbeing and equality-related impacts was undertaken through the Equality Impact Assessment [APP-214]. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments. On the basis of the Human Health Summary Statement, Equality Impact Assessment and Mental Health and Wellbeing Addendum, the Applicant has not identified a likely significant population-level health effect. With regard to landowner engagement and land ownership enquiries, the Applicant notes the concerns raised. Engagement with landowners and affected parties has formed part of the statutory consultation and land referencing process required to support the DCO application. The Applicant seeks to undertake

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				this engagement in a proportionate and respectful manner and will continue to engage with landowners and local residents throughout the Examination process.
MT-003	Socio-Economics	Compensation and community benefits	Cllr Thomas stated that a modest energy bill reduction or community grant would not compensate individuals for health effects or an inability to sell their homes. She asked the ExA to require a cumulative health and wellbeing impact assessment and an assessment of individual financial harm, and to confirm that goodwill gestures are not a substitute for either.	The Applicant notes the request for a cumulative health and wellbeing impact assessment. Potential effects on health and wellbeing, including cumulative and in-combination effects, have been considered through the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], which draws together the findings of the technical assessments reported across the Environmental Statement. In addition, mental wellbeing and equality-related impacts, including cumulative wellbeing effects, have been considered through the Equality Impact Assessment [APP-214]. The assessment concludes that, taking account of embedded mitigation and management measures, the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. ES Volume 1, Chapter 14 – Socio-Economics [APP-050] assesses various impacts, including Jobs, Employment and Supply Chain, Skills and the Labour Market, the Temporary Accommodation Market, and Tourism Industry. All of these have potential bearings on finances; for example through generation of employment, improved labour market outcomes, or earnings to the temporary accommodation or tourism sectors. No significant adverse impacts were identified.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Moreover, the Applicant does not consider that individual financial harm or benefit is a suitable metric. For those who are affected, the compensation provisions ensure that compensation is payable under the statutory regime. In relation to property value and the potential impact of the Scheme, the Applicant refers to its responses at SOC-001 as set out in Part 5 – Thematic Response to Relevant Representations [PDA-012].

Table 2.40 Dr Annetta Berry

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ANB-001	Ecology and Biodiversity	Bat habitats	Dr Annetta Berry, objecting to the Scheme in its entirety, stated that she lives near Spring Wood, ancient replanted woodland adjoining Site 3 on the former RAF Hardwick airfield, where wartime bunkers were converted around 30 years ago by Tony Tilson of the Norfolk Bat Group into bat hibernacula. Dr Berry referred to studies finding reduced Myotis bat activity and altered feeding behaviour at solar sites, and to a BSG Ecology review (January 2024) advising that solar should be located away from valuable bat foraging habitat. She noted that the Applicant's own surveys identify the landscape as being of national importance for bats, and that Norfolk Barbastelle Study Group surveys show maternity colonies with core sustenance zones overlapping the Scheme footprint. Dr Berry noted that Norfolk Wildlife Trust has recommended the removal of Site 3, which the Applicant has not	The bat activity surveys undertaken are reported in ES Volume 3, Appendix - 8.6 Bat Activity Survey Report [APP-157] with an assessment in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] where the colony in Little Wood and Spring Wood are considered. ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the Core Sustenance Zones (CSZ's) of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limit. Within these buffers habitat creation will be undertaken. These measures will reduce the current baseline disturbance events associated with agricultural practices (currently right up to

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
			accepted, and that the Applicant describes the habitat as suboptimal while acknowledging its national importance. She stated that solar panels and infrastructure should be removed from Site 3 and the land secured for permanent bat habitat protection and enhancement, and asked the ExA to seek Natural England's view. In response to a question from the ExA, Dr Berry noted that further data is available from the Norfolk Biodiversity Information Service and the NBN Atlas.	the woodland edges), and provide enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status. Natural England in their role as a statutory consultee has raised no objection in relation to potential impacts to bats.

Table 2.41 Beverley Wilding

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
BW-001	Human Health	Children's mental health	Beverley Wilding, a Hempnall resident of around 16 years, stated that the Scheme would harm the mental health and wellbeing of the community, particularly children. Ms Wilding stated that government evidence shows that access to green space benefits children's wellbeing and self-regulation.	The Applicant recognises the concerns raised regarding the potential effects of the Scheme on community wellbeing, including the wellbeing of children and young people, and the importance of access to green space and the natural environment for physical and mental health. Potential effects on health and wellbeing associated with landscape and visual change, access and recreation, transport, noise and other environmental factors have been considered within the ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Human Health Summary Statement identifies children and young people as a potentially vulnerable group who may be more sensitive to certain effects arising from the Scheme. However, taking account of embedded mitigation and management measures, the assessment concludes that the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				In response to concerns regarding wellbeing, an assessment of mental wellbeing and equality related impacts was undertaken through the Equality Impact Assessment [APP-214]. The EqlA considered issues including access to nature, recreational opportunities, visual amenity and place attachment, as well as potential effects on children and young people. The assessment also considered the provision of landscape mitigation and permissive paths, which would help maintain opportunities for access to the countryside and outdoor recreation. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] in response to matters raised during the Examination. The Addendum provides further consideration of pathways including perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Addendum supplements, rather than replaces, the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of the Human Health Summary Statement and

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Equality Impact Assessment, finding that the Scheme is not likely to result in significant adverse effects on mental health and wellbeing at population or identified vulnerable-group level. Its findings will be reported and considered as part of the Examination and, where appropriate, may inform additional mitigation, monitoring and engagement commitments.

Table 2.42 Samantha Pashchenko-Lawson

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SPL-001	Cumulative Effects	Interconnected impacts	Samantha Pashchenko-Lawson, a Great Moulton resident, stated that the combined effect of solar, battery storage and substation developments across South Norfolk must be considered.	Cumulative schemes were identified and assessed in ES Volume 3, Appendix 2.4 – Cumulative Schemes (APP-116) . The Applicant continues to discuss the list of cumulative schemes with the host local authorities as the examination progresses.
SPL-002	Battery Safety	Water availability and thermal incidents	Ms Pashchenko-Lawson raised concerns about the availability of water for firefighting in increasingly hot and dry conditions, the protection of water resources in the event of a thermal incident, and reliance on retained firefighters.	The Applicant has submitted an Outline Battery Safety Management Plan [APP-200] (BSMP) using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). Section 4 covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. Requirement 6 in the Draft DCO [AS-032] requires a detailed BSMP to be approved by the relevant planning authority in consultation with Norfolk Fire and Rescue Service and the Environment Agency. The detailed BSMP must be substantially in accordance with the Outline BSMP [APP-200].

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
SPL-003	Alternatives and Energy Need	Right development, right place	Ms Pashchenko-Lawson stated that a 60-year development should not be dismissed as temporary, and asked whether the Applicant has shown that there is no better alternative, whether cumulative impacts have been properly assessed, and whether the benefits outweigh the long-term consequences for local communities.	Evidence for the need for the Scheme is set out in the Statement of Need [APP-206] which provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 & 2.10.2). The energy NPS also include the Government's conclusion that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve net zero (NPS EN-1, Paras. 4.2.16 – 4.2.17). Section 4.3 of the Statement of Need [APP-206] supplements the national policy position and explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify non-traditional sectors such as transport, heat and industrial demand. Regional electricity demand is likely to grow at a similar rate to national demand, underpinning Government's aim to prioritise new low carbon generation projects needed for

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Factors considered in the site selection process is given in the Site Selection Assessment [APP-215], including both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The site selection process considered different potential development areas and alternative development zones for the Scheme and presents how each of those areas perform against a number of factors. The design evolution of the Scheme, as summarised in the Design Approach Document [APP-212], has sought to avoid and/or reduce environmental impacts as far as practicable through the design process, which includes design offsets from features such as PRoW.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The ES considers alternatives at ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement [APP-209]. Having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.

Table 2.43 Simon Taylor

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
ST-001	General Matters	Connections to Macquarie Asset Management	Simon Taylor stated that many local people consider the Scheme to be a "done deal" between developers and the Department for Energy Security and Net Zero, regardless of objections, and raised concerns regarding Macquarie Asset Management as the main developer and referred to its previous involvement with Thames Water, questioning whether it is a suitable partner.	The Applicant has demonstrated the Scheme's compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO Requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The Applicant has a strong track record of developing NSIP scale projects, notably the consented Cottam Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs. The Funding Statement [APP-021] provides details of the corporate structure of the Applicant, East Pye Solar Limited, and how the Scheme is being funded.

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant, East Pye Solar Limited, is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure schemes and helps fund the transition to clean energy at the scale required. The Applicant appreciates that there is growing solar DCO precedent. However, to confirm, the role of the ExA is to determine all applications independently. There is guidance on the role of the SoS, who determines NSIP applications: 'Planning Act 2008: Guidance on the decision-making stage of an application'. For example: <i>"The Secretary of State follows the key principles set out in the Planning Propriety Guidance. This means that each decision must be based only on material planning considerations, must be approached with an open mind, must be (and be seen to be) fair and unbiased, and conflicts of interest or any appearance of impropriety should be avoided."</i> The Secretary of State must also have regard to the matters as set out in section 104 of the Planning Act 2008.

Table 2.44 Helen Smith

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
HS-001	Cumulative Effects	Reasonably foreseeable projects	Helen Smith, a resident of Wacton, stated that Wacton was not specifically named by the Applicant as being affected. Ms Smith stated that the cumulative assessment must include reasonably foreseeable projects, and that approval of the Scheme would enable other nearby schemes. She stated that the Applicant had dismissed Tasway Energy Park as being on indefinite hold, although it has Gate 1 status and has not been withdrawn, and had not referred to the Noventum scheme at all. She asked the ExA to include these projects in its assessment.	Cumulative schemes were identified and assessed in ES Volume 3, Appendix 2.4 – Cumulative Schemes (APP-116). The Applicant continues to discuss the list of cumulative schemes with the host local authorities as the examination progresses. With regards to the Tasway Energy Park, the Applicant has sought to assess all cumulate schemes in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The EIA Regulations require the assessment to take into account 'the cumulation of effects with other existing and/or approved projects...' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's Advice on Cumulative Effects Assessment. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the Scheme and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway

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				Energy Park DCO application in accordance with the aforementioned guidance.
HS-002	Socio-Economics	Agriculture, tourism and employment	Ms Smith stated that around 9,000 acres could be taken out of production across these schemes, affecting associated industries. She stated that tourism, including the Norfolk Tank Museum and the Fornsett Industrial Steam Museum, would suffer. Ms Smith disputed the Applicant's conclusion of moderate beneficial socio-economic effects, noting that Scheme employment is largely temporary while the jobs lost would be permanent.	The land quality of the land within the Order Limits is set out in the ES Chapter 15 – Soils and Agricultural Land [APP-051] and the Agricultural Land Classification [APP-182]. Chapter 15 sets out an assessment of the likely significant effects on land quality. Chapter 15 includes an assessment of the policy, national and local implications for food production and food security (for which there is no policy). Chapter 15 also sets out an assessment of the local effects on farms and land-based rural businesses. There is the potential for continued agricultural production and in the wider assessment the effect on related industries will be negligible. ES Volume 1, Chapter 14 - Socio-Economics [APP-050] includes an assessment on the economy and local businesses. The assessment concludes that the Scheme will deliver socio-economic benefits including for local businesses during the construction phase as a result of supply chain opportunities such as sourcing some materials and components locally, creating partnerships between

ID	Theme	Issue	Comments/Issue Raised	Applicant's Response
				suppliers, manufacturers and distributors that that will stimulate economic activity within the local area. In total, the construction of the Scheme will support 1,044 net direct and indirect jobs and is estimated to generate £137m in GVA over the construction phase. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the Outline ESSC [APP-205]. The detailed ESSCS is secured through Requirement 19 of the Draft DCO [AS-032]. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme.