



East Pye Solar
The Applicant's Responses to Procedural Deadline
A and Additional Submissions

Revision 1

October 2026

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The Infrastructure Planning (Examination Procedure) Rules 2010

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides East Pye Solar Limited (the 'Applicant's') response to Procedural Deadline A (the 'PDA') Submissions published by the Planning Inspectorate (PINS) on 4 September 2026, relating to the Development Consent Order Application (the 'Application') for East Pye Solar (the 'Scheme').
- 1.1.2 A total of 66 PDA Submissions were submitted to the Examining Authority (ExA) by Interested Parties in response to Annex D of the ExA's Rule 6 letter (dated 15 July 2026) **[PD-005]**.

1.2 Structure of the Report

- 1.2.1 This document provides a response from the Applicant to the matters raised through PDA Submissions and Additional Submissions and is structured as follows:
- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submissions and may have been referred to by the Applicant in responding to Procedural Deadline A submissions. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-036]**.
 - **Table 1.2** lists the Interested Parties that have submitted documents to Procedural Deadline A. Each submission has its own unique reference, which can be found within the Examination Library.
 - **Section 2** provides the Applicant's responses to those Procedural Deadline A submissions submitted by other statutory bodies, undertakers and non-statutory organisations.
 - **Section 3** provides the Applicant's responses to those Procedural Deadline A submissions submitted by parish councils, town councils and parish meetings.
 - **Section 4** provides the Applicant's responses to Procedural Deadline A submissions submitted by members of the public and those who have been identified in the **Book of Reference [APP-022]**.

Table 1.1 List of Acronyms of Submission Documents

Reference	Submission Document
DCO	Development Consent Order

Reference	Submission Document
EIA	Environmental Impact Assessment
ES	Environmental Statement
EqlA	Equality Impact Assessment
DAD	Design Approach Document
PMIE	Potential Main Issues for Examination
BNG	Biodiversity Net Gain
Shadow HRA	Shadow Habitat Regulations Regulation
Outline CEMP	Outline Construction Environmental Management Plan
Outline OEMP	Outline Operational Environmental Management Plan
Outline DEMP	Outline Decommissioning Environmental Management Plan
Outline SRMP	Outline Soil Resources Management Plan
Outline PRowPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
Outline LEMP	Outline Landscape and Ecology Management Plan
Outline ESSCS	Outline Employment, Skills and Supply Chain Strategy
Outline BSMP	Outline Battery Safety Management Plan
Outline CTMP	Outline Construction Traffic Management Plan
Outline OTMP	Outline Operational Traffic Management Plan

Table 1.2 Table of Parties submitting Procedural Deadline A submissions, as organised by the sections of this document

PDA Submission reference	Responded to in this document	Reason
South Norfolk Council [PDA-017]	No	The submission provides location suggestions to the ExA for a site inspection. 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.

PDA Submission reference	Responded to in this document	Reason
General Aviation Awareness Council [PDA-207]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
General Aviation Awareness Council [PDA-030]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
General Aviation Awareness Council [PDA-053]	No	The submission includes a request to be heard orally at the Preliminary Meeting. The Applicant does not have any comments on this submission.
General Aviation Awareness Council [PDA-063]	No	The submission includes a request to speak at Issue Specific Hearing 1. The Applicant does not have any comments on this submission.
Section 2		
BEPS [PDA-064]	Yes	The Applicant wishes to respond to points made in this submission.

PDA Submission reference	Responded to in this document	Reason
BEPS (Block East Pye Solar) [PDA-037]	Yes	The Applicant wishes to respond to points made in this submission.
BEPS [PDA-055]	No	As this is a request to speak at the Preliminary Meeting, the Applicant does not have any comments on this submission.
BEPS [PDA-058]	Yes	The Applicant wishes to respond to points made in this submission.
BEPS [PDA-045]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
BEPS [PDA-079]	Yes	The Applicant wishes to respond to points made in this submission.
Great Moulton Action Group [PDA-049]	Yes	The Applicant wishes to respond to points made in this submission.
South Norfolk Tree Warden Network [PDA-066]	Yes	The Applicant wishes to respond to points made in this submission.
Section 3		
Brooke Parish Council [PDA-036]	Yes	The Applicant wishes to respond to points made in this submission.
Morningthorpe and Fritton Parish Council [PDA-035]	Yes	The Applicant wishes to respond to points made in this submission.

PDA Submission reference	Responded to in this document	Reason
Woodton Parish Council [PDA-039]	Yes	The Applicant wishes to respond to points made in this submission.
Section 4		
Aleksei Pashchenko [PDA-076]	Yes	The Applicant wishes to respond to points made in this submission.
Aleksei Pashchenko [PDA-077]	No	This is a duplication of [PDA-076] . The Applicant has provided a response to this in Table 4.1.
Andrea Snowden [PDA-050]	Yes	The Applicant wishes to respond to points made in this submission.
Andrew Neal Burraege [PDA-022]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Andrew Neal Burraege [PDA-023]	No	The submission provides location suggestions to the ExA for a site inspection. 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.

PDA Submission reference	Responded to in this document	Reason
Anne Fry [PDA-016]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Beverley Price [PDA-067]	Yes	The Applicant wishes to respond to points made in this submission.
Carina Powney [PDA-073]	Yes	The Applicant wishes to respond to points made in this submission.
Carol Ann Bailey [PDA-042]	No	This submission primarily concerns the PEIR and pre-application compliance. The Applicant directs the Interested Party to the Policy Compliance Statement [APP-210] and Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-034] .
Catherine Mary Cunningham-Elliot [PDA-040]	No	The Applicant considers this submission to replicate comments made in [RR-0265] and so there is nothing further for the Applicant to respond to in this submission. The Applicant's response can be found in The Applicant's Response to Relevant Representations Part 5: By Theme [PDA-012] .

PDA Submission reference	Responded to in this document	Reason
Chris Judge [PDA-026]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Christopher Humphrey [PDA-033]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Christopher Humphrey [PDA-070]	Yes	The Applicant wishes to respond to points made in this submission.
Christopher Laxton [PDA-025]	No	The submission provides location suggestions to the ExA for a site inspection. 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.

PDA Submission reference	Responded to in this document	Reason
David Fine [PDA-052]	Yes	The Applicant wishes to respond to points made in this submission.
David Fine [PDA-056]	Yes	The Applicant wishes to respond to points made in this submission.
David Fine [PDA-059]	No	As this is a request to speak at Issue Specific Hearing 1, the Applicant does not have any comments on this submission.
David Fine [PDA-060]	No	The Applicant considers this submission to replicate [PDA-052] . The Applicant has provided a response to this in Table 4.6.
David Fine [PDA-068]	No	As this is a request to speak at the Preliminary Meeting, OFH1, OFH2 and ISH1, the Applicant does not have any comments on this submission.
David Fine [PDA-015]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
David Fine [PDA-069]	No	The Applicant considers this submission to replicate [PDA-056] and so there is nothing further for the Applicant to respond to in this submission.
David George [PDA-046]	No	The submission provides location suggestions to the ExA for a site inspection. The

PDA Submission reference	Responded to in this document	Reason
		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.
Diane Goodwin [PDA-057]	Yes	The Applicant wishes to respond to points made in this submission.
Emilie Hildreth [PDA-074]	Yes	The Applicant wishes to respond to points made in this submission.
Gillian Marklew [PDA-062]	No	This written submission provides the list of hearings the Interested Party would like to speak or be heard at. The Applicant does not have any comments on this submission.
Gillian Marklew [PDA-031]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Iain David Ranger [PDA-054]	No	As this is a request to speak at the Preliminary Meeting, the Applicant does not have any comments on this submission.
Karen Ward [PDA-041]	Yes	The Applicant wishes to respond to points made in this submission.

PDA Submission reference	Responded to in this document	Reason
Katherine Hart [PDA-038]	Yes	The Applicant wishes to respond to points made in this submission.
Katherine Hart [PDA-028]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Keith John Bailey [PDA-043]	No	The Applicant's response can be found in The Applicant's Response to Relevant Representations Part 5 - By Theme [PDA-012] .
Loretta Dunmore [PDA-048]	Yes	The Applicant wishes to respond to points made in this submission.
Mandy Ramm [PDA-051]	Yes	The Applicant wishes to respond to points made in this submission.
Martin Chandler [PDA-024]	No	The submission provides location suggestions to the ExA for a site inspection. 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.

PDA Submission reference	Responded to in this document	Reason
Martin Chandler [PDA-072]	Yes	The Applicant wishes to respond to points made in this submission.
Melanie Barrow [PDA-018]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Melanie Barrow [PDA-071]	Yes	The Applicant wishes to respond to points made in this submission.
Melvyn John Porter [PDA-075]	Yes	The Applicant wishes to respond to points made in this submission.
Neville and Pauline Earl [PDA-044]	Yes	The Applicant wishes to respond to points made in this submission.
Richard Dunham [PDA-032]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Robert James Hazell [PDA-029]	No	The submission provides location suggestions to the ExA for a site inspection. The Applicant has provided the

PDA Submission reference	Responded to in this document	Reason
		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.
Robert James Hazell [PDA-047]	No	The Applicant considers this submission to replicate [PDA-029] and so there is nothing further for the Applicant to respond to in this submission.
Robert James Hazell [PDA-065]	No	The Applicant considers this submission to replicate [PDA-029] and so there is nothing further for the Applicant to respond to in this submission.
Ross Jolliffe [PDA-078]	Yes	The Applicant wishes to respond to points made in this submission.
Sally Lynch [PDA-020]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Steven Dunnell [PDA-019]	No	The submission provides location suggestions to the ExA for a site inspection. The Applicant has provided the Applicant's Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1] at

PDA Submission reference	Responded to in this document	Reason
		Deadline 1. This has considered all requests for site visits and set out rationale behind their inclusion or exclusion.
Trevor Lynch [PDA-021]	No	The submission provides location suggestions to the ExA for a site inspection. 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.
Victoria Chandler [PDA-034]	No	The submission provides location suggestions to the ExA for a site inspection. 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.

2 The Applicant's responses to Procedural Deadline A Submissions submitted by statutory parties, undertakers and non-statutory organisations

Table 2.1 Block East Pye Solar [\[PDA-064\]](#); [\[PDA-037\]](#); [\[PDA-058\]](#) and [\[PDA-079\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
BEPS-PDA-001	Site selection Cumulative impact	4. Land Parcel 1 concerns 4.1 This Cumulative Choke Point has the highest concentration of the most intensive and harmful effects of the scheme falling on the village of Great Moulton." 4.2 Site Selection. The Applicant has not demonstrated that the site-selection process was sufficiently transparent, criteria-led or environmentally robust." From the documents provided this most intensive and partly permanent infrastructure at Site 1/Sub-Site 1B, is based on land availability and willing-landowner considerations 4.3 Cumulative harm is not confined to visual change from one dispersed solar panel field. It is the combined effect of the convergence of the concentration of	The Applicant notes this comment and refers to its response to BEPS Relevant Representation, particularly its response to site selection and the Great Moulton infrastructure hub under comment BEPS-022 and BEPS-168, and BEPS-163, BEPS-164, and BEPS-167 in relation to the factors influencing site selection in The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010].

ID	Theme	Comments/Issues Raised	Applicant's Response
		National Grid Substation, Project Substations and all major infrastructure.	
BEPS-PDA-002	Site selection National Grid Substation	6. National Grid Substation & Project Substations: Non recoverable harm. The National Grid Substation/Grid Connection Infrastructure are permanent no decommissioning is planned.	The Applicant refers to its response to BEPS Great Moulton under comment ID BEPSG-009 in The Applicant Response to Relevant Representations Part 3 [PDA-010]. The National Grid Substation will result in a permanent loss of land, as set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The significance of the loss of 6.1 hectares (ha) of Best and Most Versatile Land (BMV) is assessed as minor adverse and not significant.
BEPS-PDA-003	Site selection	Great Moulton and BEPS request to the Examining Authority is very straightforward: “Has East Pye actually demonstrated that Site 1B is an environmentally justified location for this concentration of infrastructure, and that realistic, less harmful alternatives were properly assessed before this location was selected?” This we think is a central issue.	The Applicant notes this comment and refers to its response to BEPS Relevant Representation, particularly its response to site selection and the environmental justification for the location of infrastructure at Sub-Site 1B under comment BEPS-022, and to the appraisal of reasonable alternatives under comments BEPS-163, BEPS-164, BEPS-167 and BEPS-168 in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010]. NPS EN-1 Paragraph 4.3.9 states that: <i>‘this NPS does not contain any general requirement to consider alternatives or to establish whether the</i>

ID	Theme	Comments/Issues Raised	Applicant's Response
			<i>proposed project represents the best option from a policy perspective.'</i>
BEPS-PDA-004	Site selection	BEPS does not dispute the national need for renewable energy infrastructure. Our concern is whether that national need justifies concentrating some of the Scheme's most intensive and partly permanent infrastructure in our rural village – Great Moulton East Pye's own Site Selection Assessment confirms that Norwich Main was originally considered but rejected because of grid-capacity constraints. We consider the following is critical: East Pye records that willing-landowner availability materially influenced the search; its agents focused on large landholdings with potentially willing owners, and not every area of unconstrained agricultural land was examined in detail. Alternative land south of Station Road was also rejected because a willing landowner was not forthcoming. [APP/7.20; APP/6.1.5] Why is this so important: Site 1B is not full of solar panel. It is where the National Grid Substation, 400 kV Project Substation, grid	The Applicant has provided a detailed response to comments regarding the site selection process for Site 1B, particularly the location of the National Grid Substation. In addition to the identified responses at BEPSG-003, BEPS-022, BEPS-168, BEPS-163, BEPS-164, BEPS-167, BEPS-168 which address this comment, the Applicant refers to its response to Block East Pye Solar Great Moulton under comment ID BESPG-003 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055]. Provides an assessment of in-combination effects, where receptors are subject to residual effects under more than one environmental topic. In-combination effects have been considered during construction, operation, and decommissioning phases of the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		connection works, overhead-line alterations, cable routes, construction access and abnormal-load movements converge and solar arrays are located. The adjoining BESS & substation adds another major industrial and safety component. We therefore regard Site 1B as a cumulative infrastructure choke point. East Pye has assessed individual topics, but we have not identified one clear receptor-level assessment bringing together the combined effects on Great Moulton from noise, lighting, traffic, landscape change, drainage, ecology, land take and long-term electrical infrastructure. [APP/6.1.19; APP/7.6]	
BEPS-PDA-005	Site selection Soils and Agricultural Land	There is also permanent harm. East Pye records that the National Grid Substation alone would permanently remove approximately 6.1 hectares of Grade 2 Best and Most Versatile agricultural land. [APP/6.1.15].	Agricultural land quality was one of the criteria assessed when selecting a site for the National Grid Substation. Within the Site Selection Assessment (SSA) [APP-215] NGET confirmed that a new substation would be required to connect the Scheme to the grid and it was identified by National Grid there is available capacity along the Bramford to Norwich 400kV overhead lines. The SSA made use of the provisional ALC mapping, due to the extent of undifferentiated Grade 3 land, sites on undifferentiated Grade 3 land were put forwards. The Applicant refers to their response in

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant's Response to Relevant Representations - Part 3 [PDA-010] BEPSG-009.
BEPS-PDA-006	Policy compliance Site selection	Relevance of the Oxford EN010147 Secretary of State Request The Secretary of State request for further information in the Botley West Solar Farm Case, Oxford EN010147, is not being relied upon as a binding precedent, but we are using it as a recent example of the type of information which maybe material in a large solar NSIP where concerns have been raised about alternatives, design evolution, mitigation, grid-connection dependency and cumulative impacts. The specific advice that the Secretary of State covers the same categories that directly relevant to East Pye because the most serious impacts crystallise around Site 1A-1D where the National Grid substation, project substation, overhead-line works, cable routes, construction access, BESS-related infrastructure and solar arrays converge close to Great Moulton and Tivetshall and the siting of the BESS adjacent to Site 1. The Information sort was: on site selection, rejected grid-connection options, land-	The scope of the Examination and matters to be scrutinised is for the ExA and not the Applicant to dictate. However, in the meantime, the Applicant signposts the following in response to BEPS' specific concerns: • <i>“East Pye should be required to provide a coherent, site-specific and receptor-level explanation of why Land Parcel 1 was selected”</i> – Section 3 of the Site Selection Assessment [APP-215] identifies how the search for a suitable National Grid site identified a location at Site 1B, south of Great Moulton, as the most appropriate location for the PoC to the transmission infrastructure. The Site Selection Assessment explains more widely how all of the sites were otherwise selected, by reference to the relevant national policy tests or as otherwise appropriate, for example the Horlock Rules for identifying the new substation location. • <i>“how less harmful alternatives were rejected”</i> – The NPS EN-1 is unequivocal that this is <u>not</u> the relevant test. Paragraph

ID	Theme	Comments/Issues Raised	Applicant's Response
		search methodology, locational disadvantages, National Grid substation delivery, connection dates, tower works, updated grid documentation, LVIA, RVAA, BMV land, ecology, aviation, hydrology, protective provisions, land-rights negotiations and the implications of possible layout reductions. We therefore submit that East Pye should not be permitted to rely on broad national need, outline mitigation and fragmented topic chapters to justify this location. East Pye should be required to provide a coherent, site-specific and receptor-level explanation of why Land Parcel 1 was selected, how less harmful alternatives were rejected, how grid infrastructure will be delivered, whether all associated works are within the Order Limits, and whether the cumulative effects on residents, PRow users, private water supplies, ecology, heritage, roads and aviation have been properly assessed.	4.3.24 provides that <i>"The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals"</i>. • <i>"how grid infrastructure will be delivered"</i> – see the Applicant's response to Action Point 11 in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [EN0110014/EXAM/9.17]. • <i>"whether all associated works are within the Order Limits"</i> – Yes. Article 3 of the Draft DCO [AS-032] confirms that <i>"Subject to the provisions of this Order and the requirements in Schedule 2 (requirements), the undertaker is granted development consent for the authorised development to be carried out <u>within the Order limits</u>"</i> (our emphasis). • <i>"Whether the cumulative effects on residents, PRow users, private water</i>

ID	Theme	Comments/Issues Raised	Applicant's Response
			<i>supplies, ecology, heritage, roads and aviation have been properly assessed</i> – the cumulative effects have been assessed in each topic chapter of the ES. For example, see section 8.12 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and section 10.11 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] .
BEPS-PDA-007	Need	1. No Need The Statement of Need does not overcome the regional oversupply and proportionality problem BEPS objects to the applicant's Statement of Need because it does not demonstrate a convincing need for this particular Scheme in this particular location, but instead relies on broad national policy support for solar generation in principle. The critical point is that the applicant's own Statement of Need is said expressly to acknowledge that the Site lies at the border of the "Central England" and "E. Anglia" transmission network regions and that NESO's Connections Reform process has already prioritised sufficient solar schemes to meet the relevant Clean Power 2030	The Applicant has provided a response to comments around the need for the Scheme, including the BESS in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. A detailed response can be found under comment ID BEPS-002 and BEPS-006 in the above document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		regional capacity ranges for 2035 in both regions. If that is correct, it is a striking concession: it means the relevant regional ranges are already met by prioritised schemes, so the need for Solar cannot simply be assumed from national policy statements about optionality, attrition and urgency. The applicant's own ES Chapter 5 confirms that the alternatives exercise is framed from the outset by an asserted "clear and urgent need" for the Scheme at the proposed scale, and that even a smaller development was not taken forward as a reasonable alternative. In BEPS's submission, that approach begs the very question that should be answered. Once the relevant regional capacity ranges are already said to be met by other prioritised projects, the applicant must show why this highly constrained 500MW scheme, with major and disputed effects across ecology, water, heritage, agricultural land, transport and human health, is nevertheless necessary and proportionate here. BEPS further objects that the claimed solar-plus-storage justification is itself contingent, because the Statement of Need is said to	

ID	Theme	Comments/Issues Raised	Applicant's Response
		admit that the BESS has only Gate 1 prioritisation and no confirmed indicative connection date, while still relying on storage-led benefits of flexibility, affordability and resilience. Accordingly, BEPS submits that the Statement of Need materially overstates what national policy does for the applicant: it may establish a general need for low-carbon infrastructure, but it does not establish that East Pye Solar is regionally necessary, proportionate or justified once the existing prioritised pipeline and the Scheme's very substantial local harms are properly weighed.	
BEPS-PDA-008	DCO Process Policy Compliance	2. Procedural Defects, Uncertain Controls and Inadequate Consultation DCO powers, deferral and deliverability BEPS objects that the draft Development Consent Order does not yet provide a sufficiently certain, enforceable or environmentally assessed basis for consent. PINS has already identified issues including uncertainty around "permitted preliminary works", the need to tighten the definitions of "commence" and "maintain", inconsistent document dates	The Applicant refers to its response to comments on this matter under comment ID BEPS-057 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010].

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		and terminology, and reliance on qualified wording in outline management plans. These defects are material because they affect whether all works capable of causing significant environmental effects have been assessed and lawfully secured. The repeated use of phrases such as “where practicable”, “as far as practicable”, “where appropriate” and “to be determined at detailed design” leaves important mitigation for watercourse crossings, haul routes, noise, drainage, firewater, ecology, archaeology, utilities and decommissioning insufficiently fixed at examination stage. BEPS therefore submits that the Examining Authority should require a corrected and consolidated draft DCO, narrowed definitions of “commence” and “maintain”, clear confirmation that preliminary works are within the assessed ES envelope, and precise requirements securing all material mitigation through enforceable standards, triggers, approval mechanisms and monitoring obligations. This application cannot be treated as a stable control package unless the DCO certification schedule, document dates, titles and version numbers are corrected.	

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		In a scheme relying heavily on outline documents and certified plans, document-control defects directly affect enforceability, PINS has given multiple concrete examples of multiple concrete examples: Schedule 12 says February 2026 while cover pages say March 2026; the draft DCO calls Appendix 10.6 an "Outline Archaeological Mitigation Strategy" although the submitted document is titled "Archaeological Mitigation Strategy.	
BEPS-PDA-009	Scheme Description	BEPS is concerned that the application documents do not describe the location of the BESS and associated grid-hub infrastructure with sufficient consistency. ES Chapter 4 appears to describe Work No. 2, the BESS compound, as being contained within Sub-Site 1B, while other documents refer to a separate BESS Site. This should be clarified because the location and relationship between the BESS, Sub-Site 1B, the National Grid Substation and associated project substations is central to the assessment of fire safety, drainage, access, landscape, noise, cumulative grid-hub effects and land powers.	The Applicant confirms that the BESS will be located within the BESS Site. See ES Volume 2, Figure 1.1 - Site Location Plan [APP-057] for the BESS Site location, ES Volume 1, Chapter 3 – The Order Limits [APP-039] for a description of the BESS Site, and Sheet 19 of the Works Plans [AS-002 and AS-003] for the extent of Work No. 2. It is acknowledged that ES Volume 1, Chapter 4 – The Scheme [APP-040] paragraph 4.2.7 states that the BESS will be contained within Sub-Site 1B; this has been amended and submitted at Deadline 1 [EN0110014/EXAM/6.1.4]. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters of the Scheme. The Environmental Statement therefore assesses the

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		BEPS submits that the Applicant should be required to provide a corrected and consolidated explanation of the BESS location, its relationship with Sub-Site 1B and the wider grid-hub infrastructure, and confirmation that the ES has assessed the correct worst-case layout.	likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme.
BEPS-PDA-010	Consultation and Engagement	3. Consultation Adequacy We object to the adequacy and reliability of the statutory consultation due to material defects in coverage, reporting and access. The applicant's notices show it related to an exceptionally large and complex scheme, including BESS, National Grid substation options, cable-route corridors, works to the existing 400kV overhead line and pylons, compulsory acquisition powers, and a 60-year operational life. Consultees required clear, accurate and stable information; in BEPS's submission, that was not provided. BEPS further submits that consultees were asked to comment on a project that was not sufficiently settled, undermining their fair opportunity to understand and respond	<u>Adequacy of Consultation</u> The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. <u>Scheme Components and Parameters</u> The Works Plans [AS-002 & AS-003] and Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters and commitments for Scheme components, including the BESS, National Grid substation, Project Substations and pylons. This is explained in ES Volume 1, Chapter 2 – Environmental Impact Assessment [APP-038], the Environmental Impact Assessment is based on the 'Rochdale Envelope' in accordance with guidance from the

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		to the likely significant effects of the scheme ultimately applied for. Access to the full material was constrained: the section 48 notice and section 46 notification stated that hard copies of the PEIR and PEIR NTS were available only on payment of £750, while other materials were free. BEPS submits this plainly limited effective public access to full environmental information. At the acceptance state, the following matters were framed as acceptance-stage observations and did not refuse acceptance. BEPS submitted that the listed inadequacies go beyond typographical matters. They include uncertainty over the scope of authorised works, whether potentially significant effects have been assessed, the precision and enforceability of mitigation, CA funding evidence, HRA completeness, flood-risk assumptions, consultation coverage and usability of examination documents and argue that the application documentation requires close scrutiny and correction before the Examining Authority can be satisfied that the proposal is fully examinable, enforceable and environmentally	Planning Inspectorate to assess the worst case scenario. The iterative process in the design evolution was reflected at each stage of consultation and consultees were given an opportunity to comment on changes at appropriate times during pre-application. <u>Access to Consultation Materials</u> The Applicant has responded to BEPS' comment regarding access to consultation materials under comment ID BEPS-044 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. <u>Listed inadequacies</u> The Applicant refers to its detailed response to BEPS relevant representation in Table 2.3 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. This includes the Applicant's response to: - HRA completeness under comment ID BEPS-082 to BEPS-088; - Flood risk assumptions under comment ID BEPS-265 to BEPS-266; and - Consultation coverage under comment ID BEPS-035 to BEPS-037.

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		assessed. (EN0110014-000275-Section 51).	
BEPS-PDA-011	Site Selection	4. Land Parcel 1 as the Cumulative Infrastructure Choke-Point 4.1 Choke Point Land Parcel 1 should be assessed as the point of convergence for the Scheme's most intensive infrastructure. The harm is not confined to visual change from one substation. It is the combined effect of grid infrastructure, cable works, overhead-line changes, access, construction traffic, lighting, drainage, noise, safety controls and land-take. That convergence creates a materially different impact from dispersed solar panel fields and requires a specific cumulative assessment for Great Moulton. The Planning Inspectorate's cumulative assessment guidance, reflected in the Applicant's own Appendix 2.4, distinguishes cumulative effects from in-combination effects. The Applicant's assessment should therefore explain how the combined and interacting effects fall on the same receptors in and around Great Moulton.	The Applicant refers to its responses on in-combination effects under comments GMAG-048, GMAG-233, BEPS-469, BEPS-471, and BEPS-472 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010].

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		The Applicant's topic-by-topic approach obscures the cumulative reality at Land Parcel 1. The National Grid Substation, Project Substation, overhead-line works, cable routes, construction traffic, lighting, drainage, noise, firewater and land-rights powers converge on the same community and receptors. A receptor-level and place-based cumulative assessment is required. A topic-by-topic conclusion of "not significant" is not a substitute for a place-based assessment of the grid hub as experienced by residents, rights-of-way users, ecological receptors and landowners	
BEPS-PDA-012	Site Selection	4.2. Site selection - unlawful or inadequate alternatives BEPS objects that the Applicant has not demonstrated a lawful, transparent or environmentally robust site-selection and alternatives appraisal for the proposed National Grid substation and associated 400kV infrastructure at Site 1 / Sub-Site 1B. The relocation and escalation of grid infrastructure into this location materially changes the character of the Scheme: a 400kV installation is not comparable to a	The Applicant notes this comment. The Applicant has provided detailed responses to comments regarding the site selection process for Sub-Site 1B, the application of the Horlock Rules, compliance with Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and consultation on the upgrading of the 132kV to 400kV Project Substation in its responses to Block East Pye Solar under comments BEPS-022, BEPS-163, BEPS-164, BEPS-167, BEPS-168, BEPS-169, BEPS-173, and BEPS-178 and to BEPS Great Moulton under comments BEPSG-003, BEPSG-005 and

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		smaller local substation, and brings materially greater landscape, visual, noise, access, safety, EMF, drainage, ecological, agricultural and community consequences. The selected site would concentrate the National Grid substation, 400kV project substation, BESS-related infrastructure, overhead-line works, access routes, fencing, lighting, drainage and security equipment into and around a sensitive rural location. That concentration should have triggered a comprehensive reassessment of alternatives and environmental effects, but the Applicant has not demonstrated that such a reassessment has been undertaken. The defect is fundamental because the alternatives appraisal appears to have been materially constrained by land availability, willing landowners and prior land assembly, rather than by a genuinely open, criteria-led comparison of reasonable alternatives. Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the Environmental Statement to describe the reasonable alternatives studied,	BEPSG-006, in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010].

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		explain the main reasons for the chosen option, and compare environmental effects. NPS EN-5 also requires early and proper application of the Horlock Rules, including avoiding high-amenity areas where possible, protecting important landscape and ecological features, using landform and existing screening, and minimising visual, noise and other environmental effects as far as reasonably practicable.	
BEPS-PDA-013	Site selection	BEPS submits that the Applicant has not met that standard. It has not shown that Great Moulton was selected as the least harmful or most appropriate location, rather than the most available or convenient one. Nor has it provided a convincing like-for-like explanation of why constraints treated as disqualifying elsewhere, including rural access limitations, road geometry, land-take, proximity to receptors, ecological sensitivity and landscape exposure, are said to be manageable at Great Moulton. The Examining Authority should therefore attach substantial negative weight to the Applicant's site-selection case unless and until a revised, legally compliant alternatives appraisal is provided. That appraisal should identify the full search	The Applicant refers to its response provided at BEPS-PDA-012.

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		area, all reasonable alternative siting zones, including land not already controlled by willing landowners, and assess them consistently against environmental, technical, planning, safety and community criteria. It should also properly apply the Horlock Rules, assess lower-grade agricultural land, consider Gas-Insulated Switchgear and other lower-footprint technologies, and examine the cumulative effects of the western infrastructure cluster. On the evidence presently available, BEPS submits that the Applicant has not justified placing permanent large-scale transmission infrastructure on Grade 2 agricultural land in an exposed rural landscape close to homes, public rights of way, ecological receptors, heritage assets and private water supply risks. The Applicant cannot and should not safely rely on earlier assumptions if those assumptions were made for a materially different infrastructure arrangement. BEPS submits that the Applicant has failed to do so. BEPS is particularly concerned that the Applicants site-selection and alternatives	

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		appraisal has not been properly reviewed following the relocation and escalation of grid infrastructure.	
BEPS-PDA-014	Cumulative and In-Combination Effects	4.3 Cumulative impact Site 1 should be assessed as the point of convergence for the Scheme's most intensive infrastructure. The harm is not confined to visual change from one substation. It is the combined effect of grid infrastructure, cable works, overhead-line changes, access, construction traffic, lighting, drainage, noise, safety controls and land-take. That convergence creates a materially different impact from dispersed solar panel fields and requires a specific cumulative assessment for Great Moulton. The Planning Inspectorate's cumulative assessment guidance, reflected in the Applicant's own Appendix 2.4, distinguishes cumulative effects from in-combination effects. The Applicant's assessment should therefore explain how the combined and interacting effects fall on the same receptors in and around Great Moulton. The Applicant's topic-by-topic approach obscures the cumulative reality at Site 1.	The Applicant refers to its responses on in-combination effects under comments GMAG-048, GMAG-233, BEPS-469, BEPS-471, and BEPS-472 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010].

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		The National Grid Substation, Project Substation, overhead-line works, cable routes, construction traffic, lighting, drainage, noise, firewater and land-rights powers converge on the same community and receptors. A receptor-level and place-based cumulative assessment is required. A topic-by-topic conclusion of "not significant" is not a substitute for a place-based assessment of the NatGrid Substation & 400kV Project Substation as experienced by residents, rights-of-way users, ecological receptors and landowners	
BEPS-PDA-015	Soils and Agricultural Land	5. Permanent Loss of Grade 2 BMV Agricultural Land EPS submits that the proposed siting of the National Grid substation and 400kV Project substation at Site 1B is unacceptable in soils and agricultural land terms. Site 1B is identified in the Applicant's evidence as Grade 2 Best and Most Versatile agricultural land. The National Grid substation alone would permanently remove at least 6.1 hectares of Grade 2 land, with further Grade 2 land required for the 400kV Project substation and associated infrastructure, including access	The Applicant refers to its response under comment ID BEPS-PDA-002. The NG Substation will result in the permanent loss of 6.1ha of BMV land as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. The significance of the permanent loss of 6.1ha of Grade 2 land is assessed as minor adverse and is not significant.

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		tracks, cabling, drainage, fencing, security works and related development. This is not equivalent to the temporary or potentially reversible use of land for solar panels. The Applicant's general reliance on reversibility and continued agricultural compatibility may apply differently to panel fields than to permanent or semi-permanent infrastructure such as substations, grid equipment, access works, drainage systems and fire-safety infrastructure. These elements involve a more intensive and durable change in land use, with greater potential for soil sealing, excavation, compaction, drainage alteration, fragmentation and long-term loss of agricultural function.	
BEPS-PDA-016	Soils and Agricultural Land	The concern is also cumulative. The Scheme would concentrate permanent and long-term infrastructure across Site 1, Site 2 and the BESS Site, including Grade 2 land at each location. The Applicant's worst-case assessment identifies up to 28.9 hectares of Grade 2 BMV land affected, rising to 37.9 hectares if mitigation planting is treated as permanent agricultural land loss. We would submit	All schemes assessed within ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] section 15.11 are expected to involve small areas of permanent land take. Consequently, there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha. This would lead to a significant adverse effect.

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		that a component-by-component assessment understates the true effect, because the cumulative loss, disturbance, fragmentation and potential downgrading of BMV land across the western infrastructure cluster is materially greater than the sum of individual elements. The soils and agricultural land harm must also be considered alongside the Applicant's own landscape assessment. Within LCA E2 Great Moulton Plateau Farmland, significant Major Adverse effects are identified during construction, with significant Moderate Adverse effects during operation and remaining significant by Year 15. For Site 1, effects remain Major Adverse due to the scale of the infrastructure. This reinforces concern that the proposed grid hub would impose a permanent industrialising effect on high-quality agricultural land within a sensitive rural landscape.	The Applicant recognises the concern regarding landscape character. ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] identifies significant effects within LCA E2 Great Moulton Plateau Farmland landscape during construction and significant effects during operation Year 1 and Year 15, reflecting the sensitivity of this landscape and the scale of change associated with the Scheme. The assessment also acknowledges that mitigation planting requires time to establish, with effects considered at completion and again after 15 years. The Applicant has sought to minimise effects through siting, design refinements, retention of landscape features, buffers and substantial landscape mitigation measures, which have evolved throughout the design process. 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 Requirement 7 in the Draft DCO [AS-032]. Both ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] and Chapter 7 -

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			Landscape and Visual [APP-043] recognise that there will be adverse effects.
BEPS-PDA-017	Soils and Agricultural Land	We would further submit that the Applicant has not demonstrated that the permanent loss of Grade 2 land at Site 1B is unavoidable, or that Site 1B represents the least harmful location. The siting appears to have been influenced by land availability and willing landowners rather than a neutral, criteria-led assessment of reasonable alternatives. The Applicant has not shown that lower-quality agricultural land or less damaging layouts were properly assessed and rejected on planning merits. Given the permanent nature of the proposed grid infrastructure, the loss of high-quality BMV land requires a clear and compelling justification. We would submit that this justification has not been provided. Substantial negative weight should therefore be given to the permanent and cumulative loss, disturbance and degradation of Grade 2 BMV land at Site 1B and across the wider western cluster. The proposals should not be accepted unless the Applicant provides robust	The Applicant has provided detailed responses to comments regarding the use of Best and Most Versatile (BMV) agricultural land at Sub-Site 1B, the influence of land availability and willing landowners on the site selection process, and the consideration of lower-quality agricultural land as reasonable alternatives, in its responses to Block East Pye Solar under comments BEPS-163, BEPS-167, BEPS-171, BEPS-172, BEPS-401 and BEPS-402, and to Block East Pye Solar Great Moulton under comments BEPSG-008, BEPSG-009 and BEPSG-010, in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010]. ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] and the accompanying Agricultural Land Classification Survey [APP-181], which together set out the assessment of the effects of the Scheme on agricultural land quality and confirm that the worst-case permanent loss or downgrading of BMV land amounts to 6.1 ha for the National Grid Substation and 12.1 ha for the BESS and Project Substations. During the construction phase, the assessment concludes that with embedded measures in place,

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		evidence that no less damaging alternative exists.	there would be some potential permanent loss or downgrading of BMV quality land in relation to the location of Project Substations, BESS, National Grid Substation, Access Tracks and tree planting. Within these areas, this would result in significant (moderate adverse) residual adverse effects on BMV quality land. As set out in Section 5.1 of the Site Selection Assessment [APP-215] given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3 land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3. The Applicant refers to its response under BEPSG-009 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010].
BEPS-PDA-018	Soils and Agricultural Land	5.1 Soils, BMV land and reversibility We would submit that the Applicant's reliance on reversibility and continued agricultural compatibility should be treated with caution in relation to Land Parcel 1. While such arguments may have some relevance to solar panel fields, they apply differently to permanent or semi-permanent infrastructure such as substations, grid equipment, access works, drainage systems and fire-safety infrastructure.	The NG substation will lead to the permeant loss of 6.1ha of Grade 2 land as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. Other fixed equipment within Land Parcel 1 can and will be restored back to a comparable ALC grade upon decommissioning. Principles for decommissioning are set out in the Outline Soil Resource Management Plan [APP-204]. A detailed SRMP will be required pre-construction and can be secured by DCO Requirement.

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		These elements involve a more intensive and durable change in land use than raised solar arrays and may result in greater disturbance, compaction, sealing, excavation and long-term loss of agricultural function. The planning balance should therefore distinguish clearly between temporary panel fields and the more permanent grid-hub infrastructure proposed on Best and Most Versatile agricultural land.	Paragraph 9.4.14 of the Planning Statement [APP-209] considers both the temporary loss of BMV quality agricultural land, and the potential permanent loss in relation to the location of the Project Substations, BESS, National Grid Substation, Access Tracks, and tree planting.
BEPS-PDA-019	Water Environment Ground Conditions	6. National Grid Substation and Project Substation: Non recoverable harm BEPS objects to the adequacy of the Applicant's assessment of water-environment risks arising from the proposed National Grid substation and 400 kV project substation. The assessment does not adequately address the toxic and polluting substances associated with major high-voltage infrastructure, including transformer oils, insulating fluids, fuels, hydraulic oils, concrete washout, contaminated sediment, firewater, firefighting foams, metals, switchgear residues and hazardous maintenance wastes.	The Applicant has provided a response to comments raised by BEPS on pollution management for all phases of the Scheme and management of residual risk of pollution from the BESS (normal operation and fire incident) and the National Grid and Project Substations. The Applicant therefore refers to its response in The Applicant's Response to Relevant Representations - Part 3 [PDA-010] under comment ID BEPS-264.

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		This omission is particularly serious because Site 1 / Sub-Site 1B is located in an area where private water supplies and permitted abstractions are present. The Applicant's own material identifies multiple private water supplies or abstractions within the study area, yet the site-selection and environmental assessment have not demonstrated that private water supply risk, groundwater pathways, recharge zones or emergency contamination scenarios were given determinative weight. A 400 kV substation is a permanent industrial installation. Its water risks are not confined to ordinary operation. They include construction disturbance, fuel and oil spills, transformer failure, bund leakage or overtopping, contaminated drainage, extreme rainfall, firefighting runoff, maintenance activity and decommissioning. In the event of a fire, contaminated firewater may contain oil, soot, metals, combustion residues and foam chemicals. Given the known persistence and public-health concern associated with PFAS contamination in groundwater and drinking-water sources, the Applicant should be required to confirm that PFAS-containing firefighting foams will	

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		not be used or stored and to provide a robust firewater containment strategy.	
BEPS-PDA-020	Water Environment Ground Conditions	The Applicant has not shown, through a site-specific hydrogeological risk assessment, that contaminants could not migrate through shallow groundwater, permeable soils, field drains, cable trenches or preferential pathways to private water supplies. Nor has it demonstrated that the cumulative risks from the National Grid substation, 400 kV project substation, BESS, cable corridors, pylons, access roads, construction compounds and Sub-Site 1D have been assessed as an integrated infrastructure cluster.	The Applicant has provided a response in relation to hydrogeological risk assessment, pollution management for all phases of the Scheme and management of pollution from surface water runoff from the BESS (normal operation and fire incident), National and Project Substations and cables. The Applicant therefore refers to its responses in The Applicant's Response to Relevant Representations - Part 3 [PDA-010] under comment IDs BEPS-260 to BEPS-281 in Table 2.3.
BEPS-PDA-021	Water Environment	BEPS therefore requests that the Examining Authority require a revised water-environment and private-water-supply risk assessment before any positive weight is attached to the selected location. That assessment should include baseline testing, a source-pathway-receptor model, oil and firewater containment design, emergency response measures, monitoring commitments, alternative water supply provision, and a transparent comparison of whether alternative	The Applicant has responded in detail to Block East Pye Solar's comments on ground water, private water supplies and contamination, as presented in their Relevant Representations. The Applicant refers to the following responses to BEPS in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]: - Private water supplies – please refer to responses under comment IDs BEPS-258 to BEPS-263.

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		locations would materially reduce risks to groundwater and private water supplies. The ES does not demonstrate that Sub-Site 1B is a safe or appropriate location for permanent grid infrastructure. The ExA should therefore apply substantial negative weight to the unresolved groundwater and private-supply risks.	- Water environment – please refer to responses under comment IDs BEPS-264 to BEPS-281.
BEPS-PDA-022	Compulsory Acquisition	7. Compulsory Acquisition and Inadequate Funding The case for compulsory acquisition is not yet made. The Applicant has not provided sufficient quantified funding information for the land and rights it seeks to acquire, nor has it demonstrated that acquisition of Sub-Site 1B and associated rights is necessary and proportionate once alternatives, environmental constraints and cumulative effects are properly tested. This is not merely a landowner compensation issue. It goes to whether there is a compelling case in the public interest for compulsory acquisition. PINS has expressly advised that the Funding Statement should be amended to include the Applicant companies' financial standing and a clear quantified estimate of	The Applicant has provided a response to comments raised by BEPS on compulsory acquisition powers. The Applicant therefore refers to its response to comment ID BEPS-056 and BEPS-066, in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. The Applicant has provided a response to PINS' advice regarding the Funding Statement at the 'Applicant's Response to Advice and Observations at Acceptance' [AS-040].

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		compulsory acquisition costs. Until that is provided, the compulsory acquisition case is incomplete.	
BEPS-PDA-023	Ground Conditions	8. Ground Water, Private Water Supplies and Contamination Risk BEPS submits that the Environmental Statement (ES) does not provide a legally robust or integrated groundwater and water-environment case for the proposed permanent National Grid Substation and associated 400 kV infrastructure at Sub-Site 1B. While the Applicant identifies credible contamination and deterioration mechanisms — including piling and foundation works, impermeable areas and drainage, polluted runoff, transformer oils, concrete bleed water, sediment mobilisation and contaminated firewater; the ES relies heavily on outline design, embedded mitigation and post-consent requirements. Material evidential gaps remain at Examination stage, including:	The applicant has responded and clarified how these assessments have been included within the WFD Assessment, and the WFD has been updated and will be submitted at Deadline 1 to ensure Piling is included for all relevant water bodies. The Applicant has responded in detail to Block East Pye Solar's comments on ground water, private water supplies and contamination, as presented in their Relevant Representations. The Applicant refers to the following responses to BEPS in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]: - Private water supplies – please refer to responses under comment IDs BEPS-258 to BEPS-263 - Water environment – please refer to responses under comment IDs BEPS-019 to BEPS-020; BEPS-264 to BEPS-281 and GMAG-057 to GMAG-085.

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		• Receptor-specific assessment and enforceable protection for nearby private water supplies. • A consolidated cumulative groundwater protection assessment for the Sub-Site 1B grid-infrastructure hub. • A clear Water Framework Directive (WFD)/UKTAG “no deterioration” rationale for the relevant groundwater body and hydraulically connected surface waters. BEPS therefore requests that the Examining Authority (ExA) require the further evidence and secured containment and contingency measures set out below before making any recommendation. Failing that, substantial negative weight should be attributed to this unresolved and inadequately mitigated risk.	
BEPS-PDA-024	Ecology and Biodiversity	9. European Protected Species/Barbastelle deliverability The Barbastelle bat issue is a legal deliverability issue, not only an ecological concern, with the Scheme affecting a landscape used by barbastelle maternity colonies and Core Sustenance Zones. The	The Applicant has provided detailed responses to BEPS' comments on bats. The Applicant refers to its response in The Applicant Response to Relevant Representations - Part 3 [PDA-010] under comment IDs BEPS-216 to BEPS-217, BEPS-220, and BEPS-221.

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		Applicant's ecology chapter recognises the presence of nationally important bat assemblages and multiple Core Sustenance Zones for Barbastelle maternity roosts in the Order Limits, and relies on retained hedgerows, buffers and avoidance measures to conclude no significant loss of foraging or commuting routes [APP/6.1.8, paras 8.9.606-8.9.608]. However, evidence and Natural England's favourable-conservation-status definition show the particular sensitivity of Barbastelle to roosting, foraging connectivity, lighting and disturbance. Natural England's 2024 FCS definition states that Barbastelles are associated with broadleaved woodland, require numerous roost trees, forage in woodland and riparian habitats, can travel up to 20km from roost sites to preferred foraging areas, are light-shy, and are sensitive to disturbance. Tinsley et al. (2023) found significant negative effects of ground-mounted solar PV developments on bat activity and recommended that solar PV developments should be screened in EIA for ecological impacts, with mitigation and monitoring. These matters reinforce the need for a precautionary examination of	

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		habitat fragmentation, lighting, construction disturbance and long-term grid-hub effects.	
BEPS-PDA-025	Ecology and Biodiversity	The licensing issue is strongest when tied to alternatives. If the Applicant has not shown that there is no satisfactory alternative to Land Parcel 1, the EPS licensing case remains uncertain. The Secretary of State should not assume that a protected-species licence is likely to be granted where the siting evidence for the grid hub remains incomplete and where lower-impact alternatives have not been robustly excluded. The Applicant must demonstrate that impacts can be avoided or lawfully licensed. If the alternatives case for Sub-Site 1B and the wider layout remains incomplete, the no-satisfactory-alternative test for EPS licensing remains uncertain. Ecology and Protected Species Sensitivity The parcel lies within a landscape supporting: red-listed plant species (e.g. Sulphur clover; Dyer's; Greenweed Petty; Genista tinctoria Spiny	The Applicant has provided detailed responses in relation to the need for licencing for bats. The Applicant refers to its response in The Applicant Response to Relevant Representations - Part 3 [PDA-010] under comment IDs WGRG-013, BEPS 038, and BEPS 063. The Applicant has provided detailed responses in relation to biodiversity receptors in including RNRs, and notable habitats and species. The Applicant refers to its response in The Applicant Response to Relevant Representations - Part 3 [PDA-010] under comment IDs BEPS-212, BEPS-214, BEPS-215. The Applicant has provided detailed response in relation to HRA matters. The Applicant refers to its response in The Applicant Response to Relevant Representations - Part 3 [PDA-010] under comment IDs BEPS-082. The Applicant has also submitted a Shadow Habitats Regulations Assessment [AS-036] in response to the Section 51 advice to the Applicant [PD-002]. This revision includes the citation/Natura 2000 data sheets for the European sites considered.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Restharrow; Ononis spinosa; Crosswort; • Cruciata laevipes; Pepper saxifrage; Silaum silaus • red-listed and amber-listed birds; Lapwing, Grey Partridge, Turtle Dove, Swifts, Sky Larks • invertebrate assemblages of conservation concern; • hedgehogs and other protected fauna. Field edges are also sites of concern, and as they are currently less well documented than verges there is an equally pressing need for survey before any irreversible changes take place. For example, Prangle Lane track, which looks like it may be affected by the scheme, is in effect a field edge of great importance, while the field entrance at Market Lane RNR is a highly valuable and irreplaceable habitat. PINS has identified that the HRA documentation is inconsistent and that citation/Natura 2000 data sheets for the European sites considered were not submitted with the HRA report. We would	It should also be noted that Natural England has no issues identified for internationally designated sites and that they accept the conclusions of the Shadow Habitat Regulations Assessment. Please see the Statement of Common Ground with Natural England [EN0110014/EXAM/9.10].

ID	Theme	Comments/Issues Raised	Applicant's Response
		submit that this weakens the audit trail for HRA screening and makes it harder for the competent authority and Interested Parties to test whether the correct conservation objectives and qualifying features have been assessed	
BEPS-PDA-026	Transport and Access	10. Safety, Emergency Access, Fire, Rail, Abnormal Loads and Aviation We would submit that Site 1 is not a simple solar parcel but a concentrated safety-critical infrastructure hub. The Applicant's documents identify Site 1 as including Sub-Sites 1A–1D, with the National Grid Substation and 400kV Project Substation both proposed within Sub-Site 1B. Underground and/or overhead lines, including new pylons between the National Grid Substation and the Point of Connection, would also be located within Sub-Sites 1A–1D. The BESS Site is functionally linked to this western grid hub. Fire safety, transformer delivery, abnormal-load routing, emergency access, rail interface and aviation safety are therefore central to whether Sub-Site 1B is a safe, deliverable and acceptable location. We would submit that these matters should not be treated as post-consent details where	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, 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 effects 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
		they go directly to the suitability of the site and the adequacy of the Environmental Statement.	The Applicant refers to its response to Norfolk Gliding Club's relevant representation [RR-1452] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010], in particular its response to comment IDs NGC-001 to NGC-016. The Outline Construction Traffic Management Plan [APP-201] sets out the framework for the management of Abnormal Indivisible Load (AIL) movements during construction, including advance communication with stakeholders along the route regarding the timing and details of movements, and the use of escort vehicles where required. Vehicle tracking has been undertaken for emergency service vehicles in relation to the BESS. The assessment demonstrates that emergency vehicles can access the BESS compound from the public highway and circulate throughout the internal road network. The results of the vehicle tracking assessment informed the design of the internal access arrangements and road layout within the BESS site. The Applicant has provided a detailed response in relation to fire safety in its response to BEPS Great Moulton (including in relation to surface water runoff), under comment ID BEPSG-017 within The

ID	Theme	Comments/Issues Raised	Applicant's Response
			Applicant's Response to Relevant Representations - Part 3 [PDA-010].
BEPS-PDA-027	BESS Safety Major Accidents and Disasters	10.1 Fire Safety and Emergency Response We are concerned that the fire safety case for Land Parcel 1 remains underdeveloped and too dependent on later control documents. Chapter 18 records that PINS expected fire risk associated with battery storage, including firefighting and containment measures, to be addressed through the Outline Battery Safety Management Plan. It also records concerns relating to hydrogen fluoride, prolonged fire duration, PFAS, contaminated firewater and pollution risks to drinking water, groundwater, rivers, wildlife and soils. The Applicant appears to rely on the Outline Battery Safety Management Plan, a later detailed Battery Safety Management Plan, further engagement with Norfolk Fire and Rescue Service, and firewater assessment in Chapter 9. We would submit that this is insufficient unless the assumptions, measures and enforceability of those documents are	The Applicant has provided a detailed response to this in its response to BEPS Great Moulton (including in relation to surface water runoff), under comment ID BEPSG-017 within The Applicant's Response to Relevant Representations - Part 3 [PDA-010]. For PFAS controls and contamination risk in relation to the BESS, please see the Applicant's response at GMAG-184, GMAG-236, and GMAG-250 within The Applicant's Response to Relevant Representations - Part 3 [PDA-010].

ID	Theme	Comments/Issues Raised	Applicant's Response
		available, tested and secured through the DCO. BEPS concern is not confined to the BESS. Sub-Site 1B would contain high-voltage transformers and switchgear associated with both the National Grid Substation and the 400kV Project Substation. The Flood Risk Assessment and Drainage Strategy confirm that only outline drainage arrangements are provided for the National Grid Substation, Project Substations and BESS areas, with detailed design to follow. Firewater runoff would be contained, tested and tankered off-site if required. We would submit that this is a significant deferral of core safety and pollution-control information. The DCO should not be made unless emergency access, firefighting water volumes, hydrant or water-storage provision, appliance access, thermal runaway assumptions, toxic-plume assessment, transformer fire scenarios, PFAS controls, contaminated-firewater containment and emergency response arrangements are all resolved and secured in enforceable requirements.	

ID	Theme	Comments/Issues Raised	Applicant's Response
BEPS-PDA-028	Transport and Access	10.2 Emergency Access and Abnormal Loads The Transport Assessment identifies the B1134 Station Road as a key access route for the National Grid Substation, the Project Substation in the BESS Site and the Project Substation in Sub-Site 1B. It also confirms that Abnormal Indivisible Load movements would be required to Sub-Site 1B for transformers serving both the National Grid Substation and the 400kV Project Substation, with the final number of movements deferred to the Construction Traffic Management Plan. We would submit that abnormal-load access, transformer delivery, road safety, escorting, structure checks, emergency access and highway resilience are not minor construction details. They are central to whether Land Parcel 1 can safely accommodate the proposed infrastructure and should be fully assessed and secured before consent.	The Applicant acknowledges that abnormal load access, transformer delivery, road safety and highway resilience are important considerations in determining the suitability of Sub-Sites 1A-1D, the National Grid Substation and the BESS Site for the proposed infrastructure. These matters have been considered as part of the assessment reported in 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 assessment identifies the likely and suitable routes to the Scheme, including access to Sub-Site 1B, and considers the transport effects associated with the construction and operation of the Scheme. The requirement for Abnormal Indivisible Load (AIL) movements has also been identified as part of the assessment. ES Volume 2, Figures 11.2-11.8 Likely and Suitable Routes to the Scheme [APP-095] identify the proposed routes to the Scheme, while the Outline CTMP [APP-201] sets out the framework for managing construction traffic, including AIL movements. This includes advance communication with stakeholders regarding the timing and details of movements and the use of escort vehicles where required. These measures would be secured through the DCO

ID	Theme	Comments/Issues Raised	Applicant's Response
			requirements and implemented through the final CTMP. The Applicant therefore considers that abnormal load access, AIL movements and associated transport considerations have been appropriately assessed within the Application, and that appropriate management measures have been identified and secured through the Outline CTMP [APP-201].
BEPS-PDA-029	Transport and Access	10.3 Rail Constraint The Great Eastern Main Line lies close to the western part of Site 1, with the local highway network including the B1134 Station Road and a level crossing to the west. Chapter 5 also confirms that railway infrastructure was treated as a constraint in alternative substation siting. We would is concerned that the Applicant has not provided a clear Land Parcel 1-specific assessment of rail interface risks, including construction traffic near level crossings, abnormal-load routing, emergency access during a fire or electrical incident, smoke-plume effects, safeguarding requirements and the status of any Network Rail protective provisions. These matters should be resolved before	The Applicant notes the concerns raised regarding the proximity of the Great Eastern Main Line to Sites 1A-1D and the BESS. ES Volume 2. Figures 11.2-11.8 Likely and Suitable Routes to the Scheme [APP-095] demonstrate that construction traffic associated with the Scheme would utilise the local highway network and would not route via the railway infrastructure, including the level crossing located to the west of Sub-Sites 1A-1D. In addition, safety considerations associated with the BESS have been assessed within the Outline BSMP [APP-200]. Vehicle tracking has been undertaken for emergency service vehicles in relation to the BESS, demonstrating that emergency vehicles can access the BESS compound from the public highway and circulate throughout the internal road network. The results of this assessment informed the design of the internal

ID	Theme	Comments/Issues Raised	Applicant's Response
		the acceptability of Site 1 / Sub-Site 1B is concluded.	access arrangements and road layout within the BESS Site. For protective provisions, Network Rail do not have any interests within the Order Limits, which can be seen in the Book of Reference [APP-022] (which has been updated at Deadline 1). Network Rail have also not made a relevant representation or asked for bespoke protective provisions. As such, the Applicant understands that bespoke protective provisions are not required. If Network Rail request bespoke protective provisions, then the Applicant will engage with Network Rail to discuss.
BEPS-PDA-030	Aviation Glint and Glare	10.4 Aviation Safety and Glint / Glare BEPS recognises that glint and glare are relevant to road safety, residential amenity and aviation activity. Aviation receptors include Seething Airfield, Long Stratton Airfield, Hardwick Airfield, Topcroft Farm Airfield, Nut Tree Farm Airfield and Norfolk Gliding Airfield. Chapter 18 records consultation on glint and glare, EFATO and thermal updrafts, and notes concerns from aviation stakeholders including the General Aviation Awareness Council and Seething Airfield. For Land Parcel 1, these matters are material because Site 1 forms part of the	The Applicant notes this comment and refers to its response regarding consultation adequacy under comment ID BEPS-PDA-026. The Applicant had identified the named aerodromes as listed in response ID WPC-PDA-033. Following this, the Applicant had attempted to contact the airfield owners via the published information (phone numbers and emails) to understand their position on the Scheme, as well as obtain information to inform the Applicant's assessments. Of the named aerodromes, responses were received from Norfolk Gliding Club and Seething Airfield. No responses were received from Long Stratton Airfield, Hardwick Airfield, Topcroft Farm Airfield, and Nut Tree Farm Airfield.

ID	Theme	Comments/Issues Raised	Applicant's Response
		western infrastructure cluster, including solar panels, new overhead-line works, pylons, major substations and associated construction activity. We would submit that the Applicant has not demonstrated, on a Land Parcel 1-specific basis, that cumulative aviation safety effects have been fully assessed. Where the site lies within or near any EFATO safeguarding area associated with Tibenham Airfield or other aviation receptors, the Applicant should be required to demonstrate that emergency landing corridors, glint and glare, reflective surfaces, construction activity, tall structures, airflow, thermal effects and operational safety have been properly assessed and agreed with relevant aviation consultees.	Considering the distance between the Scheme and aerodromes Long Stratton Airfield, Hardwick Airfield, Topcroft Farm Airfield, and Nut Tree Farm Airfield, the Scheme is not perceived to present an impact upon EFATO safeguarding areas, glint and glare (presented in ES Volume 3, Appendix 18.1 Glint and Glare Assessment [AS-025 to AS-029]), and thermal updraft.
BEPS-PDA-031	General Comments	AI Disclaimer: my submissions are based on research undertaken by multiple human research teams. Given the scale of the East Pye Solar application, the volume of documentation and the extent to which issues overlap across environmental, technical, legal and planning topics, BEPS also uses a closed-project bespoke GPT as a research and analytical tool.	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The GPT is used to bring together and cross-reference research already undertaken by the BEPS human research teams; to identify connections between topics and evidence across the application; and to assist in analysing that material alongside Planning Inspectorate documents, pre-examination and examination material, evidence from statutory consultees, relevant guidance and best practice, and peer-reviewed research. Its purpose is principally to enable systematic cross-referencing across a documentary record of a scale that would not be practicable to analyse comprehensively by manual methods alone. AI is not used as a substitute for human judgement or responsibility. Submission documents are compiled, reviewed, edited and checked by human members before submission. Sources and evidential propositions are checked wherever material to the argument, and determines which arguments and conclusions are advanced.	

ID	Theme	Comments/Issues Raised	Applicant's Response
		I accept responsibility for the contents, accuracy and arguments contained in its submissions. The use of AI is therefore an analytical and document-management aid within a human-led research and review process, rather than an independent author or source of evidence.	
[PDA-037] Comments on Relevant Representations			
BEPS-PDA-032	Consultation and Engagement	Multiple statutory consultees, non-statutory consultees and businesses have identified significant problems with this application. Many of these issues were identified at statutory consultation and should have been discussed and resolved collaboratively before submission of the application. BEPS submits that this application is premature, and that the examination is being used to design the project rather than assess a final project plan.	The Applicant has provided its response to all relevant representations published by the Planning Inspectorate. To ease navigation, the Applicant has split its response into the following five parts: • The Applicant's Response to Relevant Representations Part 1 – Host and Neighbouring Local Authorities [PDA-008]; • The Applicant's Response to Relevant Representations Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [PDA-009]; • The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010];

ID	Theme	Comments/Issues Raised	Applicant's Response
			• The Applicant's Response to Relevant Representations Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011]; and • The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012] (responses to comments submitted by members of the public and those who have been identified in the Book of Reference [APP-022]).
[PDA-058] Requests to participate in issue specific hearing 1 on 16 and 17 September 2026 (ISH1) and/or attend in person			
BEPS-PDA-033	Need	By the applicant's own admission, site selection was initially led by grid connection availability, which later proved to be unavailable, and also by willing landowners. The discovery that there was no regional need for this project in T7 and the lack of capacity at the initial connection site - Norwich Main - should have resulted in the project being shelved, particularly once the sensitivities and serious constraints of this landscape were known. The generic 500MW scheme relates only to availability of willing land owners and not to the specific needs of our landscape, ecology or cultural heritage.	The Applicant has provided detailed responses to comments regarding the need for the Scheme at this location, the role of grid connection availability and willing landowner availability in the site selection process, and the identification of a Point of Connection following the discounting of Norwich Main Substation, in its responses to Block East Pye Solar under comments BEPS-002, BEPS-005, BEPS-055, BEPS-163, BEPS-167 and BEPS-170, in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010] .

ID	Theme	Comments/Issues Raised	Applicant's Response
BEPS-PDA-034	Need	The applicant seeks to permanently change our landscape and ecology to enable it to construct and operate a 'temporary' energy generation project.	The operational life of the Scheme is anticipated to be 60 years. This time limitation is secured through a Requirement in the Draft DCO [APP-017] . In relation to landscape and visual effects, the Applicant draws attention to ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] , which acknowledges permeant development within the Scheme, such as the National Grid Substation and the potential significant landscape and visual effects arising from the Scheme during the operation and maintenance phase may occur as well as the, ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operation and decommissioning phases. The expected residual beneficial effects are outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] .
BEPS-PDA-035	Need	The multiple environmental constraints at each land parcel, which should have triggered avoidance, have been treated inconsistently across the scheme, undermining the mitigation hierarchy.	The Applicant refers to its response to Q1.1.1 in the Applicant's Response to the Examining Authority's Initial Written Questions [EN0110014/EXAM/9.2] , which details how the mitigation hierarchy has been followed for each environmental topic.

ID	Theme	Comments/Issues Raised	Applicant's Response
BEPS-PDA-036	Draft DCO	The powers sought in the DCO are too broad and there is not enough detail, firm language or protections written in to it to enforce it.	The justification for the DCO is set out in the Explanatory Memorandum [AS-034] . The Applicant has provided further detail in the Applicant's Response to the Examining Authorities Initial Written Questions [EN0110014/EXAM/9.2] , submitted at Deadline 1.
[PDA-079] Written submissions on the examination procedure, including the draft examination timetable			
BEPS-PDA-037	General Remarks	Procedural Deadline A – 1 September 2026 1. Purpose BEPS broadly welcomes the Initial Assessment of Principal Issues (IAP). Its concern is that East Pye Solar raises a set of interdependent questions – scheme definition, site selection, grid and construction deliverability, environmental baseline, mitigation and compulsory powers – which risk being fragmented between individual Environmental Statement chapters. The Examination should test those questions as connected issues.	The Applicant notes this comment.
BEPS-PDA-038	General Remarks	2. ISH1 should be treated as an initial hearing, with a follow-up reserved	The Applicant notes this comment. Further Issue Specific Hearings will be conducted by the

ID	Theme	Comments/Issues Raised	Applicant's Response
		Current examination guidance expressly encourages early scrutiny of the DCO, and BEPS welcomes this. However, ISH1 on 16 and 17 September also covers site selection and the scope of the proposed development, while Deadline 1 is not until 6 October. Written Representations, Local Impact Reports, ExQ1 responses and initial Statements of Common Ground will therefore not yet be before the ExA. Important statutory and specialist consultees have themselves indicated that their Relevant Representations are not their final examination evidence. Historic England expressly states that it will make further comments in its Written Representation on cumulative effects, while Natural England states that its Relevant Representation identifies only the principal submissions it wishes to make 'at this point' and that those matters may be developed or supplemented during the Examination. The ExA will therefore be asked to examine site selection and Scheme scope before the fuller positions of key consultees are necessarily before it. That creates a particular difficulty because site selection is	Examining Authority, as set out in the Examination Timetable in the Rule 8 letter [PD-007].

ID	Theme	Comments/Issues Raised	Applicant's Response
		not a self-contained topic. Its adequacy depends upon the complete evidence concerning ecology, heritage, transport, water, agricultural land, aviation, grid infrastructure and cumulative effects. Until the Written Representations and Local Impact Reports are available, neither the ExA nor other Interested Parties can know the full extent to which those bodies consider the selected Sites, design envelope or associated infrastructure to remain acceptable, to require redesign or avoidance, or to depend upon unresolved mitigation. BEPS therefore respectfully asks that ISH1 be treated expressly as an initial, high-level hearing, consistent with the Rule 6 letter, and that the ExA reserve a second hearing on site selection, Scheme scope and the draft DCO after Deadline 1. This would not delay early scrutiny of the DCO. It would ensure that final oral scrutiny of the Scheme's scope and site-selection case takes place only once the principal examination evidence of the statutory and specialist bodies is available to all parties.	

ID	Theme	Comments/Issues Raised	Applicant's Response
BEPS-PDA-039	DCO Process	3. Cross-cutting matters require an express examination route BEPS asks the Rule 8 timetable and/or ExQ1 to identify how the following will be examined: • consultation adequacy and the Consultation Report; • overall EIA adequacy and interdisciplinary integration; • material changes to the Scheme after consultation; • deferred surveys, licences and management plans; • the Rochdale Envelope; • severability and partial implementation; • whole-life replacement, cessation and decommissioning; • the solar/BESS/NGET relationship and project-specific grid deliverability; • protected species and EPS licensing issues and WFD compliance and other unresolved	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		ecological and water-environment legal gateways; • cumulative and in-combination effects; and • the necessity and proportionality of compulsory acquisition. BEPS asks the ExA to identify whether each issue will be dealt with through written questions, Written Representations, an ISH, a Compulsory Acquisition Hearing, or a combination.	
BEPS-PDA-040	DCO Process	4. Further targeted Issue Specific Hearings The Relevant Representations show substantial convergence between statutory and specialist bodies on unresolved matters. BEPS therefore asks that the timetable retain capacity for the following, where the written process does not resolve them: Consultation, EIA adequacy and deferred decision-making: material scheme changes, the Consultation Report, missing or late environmental information, and whether matters determining environmental acceptability have been left to post consent approval.	The Applicant notes this comment. The Examination timetable is a matter for the Examining Authority.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Ecology, HRA, water and ground conditions: barbastelle and other protected species; white-clawed crayfish; botanical and aquatic baselines; River Tas and Hempnall Beck; WFD; groundwater and private water supplies; Source Protection Zones; piling and Foundation Works Risk Assessments; HDD and hydrological connectivity. The ExA has already required further crayfish information. Construction and physical deliverability: HGV and AIL routes; the end-to-end port-to site route; Sites 7–10; highway works and vegetation removal; PRowS; cumulative construction; National Gas and other infrastructure interfaces. National Highways and NCC both identify unresolved route and construction issues, while NGT's representation raises the FM05 pipeline and protective provisions. Aviation, major accidents and BESS safety: Tibenham operations and emergency landing considerations; glint/glare and obstacles; BESS technology and safety envelope; emergency access; firewater containment; groundwater consequences and operational noise. The	

ID	Theme	Comments/Issues Raised	Applicant's Response
		ExA has already required further aviation engagement and a position statement. Heritage, landscape and good design, if material disagreement remains after the Local Impact Reports and Written Representations: particularly Site 1/Great Moulton, major electrical infrastructure, conservation areas, heritage settings and the environmental consequences of mitigation planting.	
BEPS-PDA-041	Grid Connection	5. Information required to make ISH1 and later hearings effective BEPS respectfully suggests to the ExA, that our Relevant Representation review has identified four schedules which would materially improve the Examination and avoid repeated disputes over what is actually authorised: A Scheme-to-powers and severability schedule: for each principal Work, whether it is mandatory, optional or severable; its dependencies; land and rights sought; and what happens to those powers if the Work is omitted, delayed or replaced by a different solution. Given East Pye's Gate 1 BESS and NGET's uncertainty over the final substation	The Applicant notes this comment. Please refer to the Applicants Response to the Examining Authorities Initial Written Questions (ExQ1) [EN0110014/EXAM/9.2], (response to Q1.1.4) in respect of the <i>Scheme-to-powers and severability schedule</i>.

ID	Theme	Comments/Issues Raised	Applicant's Response
		solution, that extra severability information has a particularly strong project-specific justification.	
BEPS-PDA-042	Grid Connection	A grid connection status and responsibilities matrix: solar and BESS connection status; when or whether the BESS can proceed/operate; the status of Site 1B; and who constructs, owns, operates and maintains each Applicant/NGET asset. NGET states that the final connection solution is not confirmed and that DCO consent would not oblige NGET to use the proposed substation.	The Applicant refers to its Statement of Need [APP-206] which at Section 2.7 sets out the Connections Reform timeline and Gate process. Paragraph 2.7.17 explains that the solar component of the Scheme has secured a Gate 2 Phase 2 prioritisation (i.e. between 2031 and 2035 inclusive). The connection for the BESS component of the Scheme has secured a Gate 1 prioritisation, the indicative connection date of which has not yet been confirmed. However, projects which continue to demonstrate they are ready to be connected are expected to be reprioritised, especially as the government continues to refine its criteria for strategic alignment. It is anticipated that some projects currently in the queue may drop out. The Applicant will therefore keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Section 4.5 of ES Volume 1, Chapter 4 - The Scheme [APP-040] describes the operation and maintenance phase of the Scheme. Section 2 of the Grid Connection Statement [APP-207] describes the current grid connection agreement for the Scheme and why the grid substation is being consented as part of the Scheme. Section 4 sets out the responsibilities of the Applicant and NGET. The Applicant confirms that the National Grid substation will be constructed and operated by NGET. All other components detailed in the DCO application will be constructed and operated by the Applicant or the undertaker in accordance with the DCO, of which being in breach of is an offence. The Applicant acknowledges that NGET is not obliged to use the proposed location for the substation site however Section 5.5 of ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041] demonstrates that the proposed location has been identified and assessed through the application of appropriate policy tools including those also used by NGET themselves to site substations. Therefore, by including the proposed substation as part of the Scheme, the Applicant seeks to secure a

ID	Theme	Comments/Issues Raised	Applicant's Response
			deliverable scheme because the Applicant has not identified any reasons why NGET would not take forward a substation at the proposed location.
BEPS-PDA-043	Scheme Description	A consolidated maximum design and construction parameters schedule: including site-by-site duration, simultaneous work fronts, piling, HGV/AIL limits, HDD, compounds, haul roads, dewatering, lighting and out-of-hours work. These quantities determine the worst case assessed.	The Applicant notes this comment. Please refer to the Applicants Response to the Examining Authorities Initial Written Questions (ExQ1) [EN0110014/EXAM/9.2] , (response to Q1.1.4) in respect of the <i>consolidated maximum design and construction parameters schedule</i> .
BEPS-PDA-044	Policy Compliance	A legal-plan reconciliation schedule: Works Plans, Land Plans, Streets/Access plans and Book of Reference on one current geographical base, with all superseded plans identified. BEPS's Relevant Representation noted inconsistent mapping throughout the application, including mapping that does not show the operational Long Stratton Bypass. This schedule would require the Applicant to demonstrate in one place that its legally operative documents actually correspond.	The Applicant notes this comment. Please refer to the Applicants Response to the Examining Authorities Initial Written Questions (ExQ1) [EN0110014/EXAM/9.2] , (response to Q1.1.4) in respect of the <i>legal-plan reconciliation schedule</i> . In addition, it should be noted that the Works Plans [AS-002] [AS-003] , Location Plan [APP-005] , Streets Plan [APP-010] , Access and Public Rights of Way Plan [APP-011] , Waterbodies River Bain Management Plan [APP-012] , Non-Statutory Sites or Features of Nature Conservation Plan [APP-013] , Statutory Sites or Features of Nature Conservation Plan [APP-014] , and Statutory or Non-Statutory Sites or Features of Historic Environment Plan [APP-015] have been updated at Deadline 1 to include

ID	Theme	Comments/Issues Raised	Applicant's Response
			base maps using the most up to date OS data and which shows the Long Stratton Bypass. Superseded plans are indicated on the Examination Library. Updates made to each document are explained in the Schedule of Changes within each document.
BEPS-PDA-045	Policy Compliance	Of particular importance due to contradictory information and minimal cross-referencing across the ES chapters, the Applicant should also provide an Environmental Interrelationships and Mitigation Consequences Schedule identifying where mitigation or redesign in one discipline creates effects in another, so that transport, landscape, drainage and ecological solutions are not assessed in isolation.	The Applicant notes this comment. Please refer to the Applicants Response to EXA's First Written Questions [EXAM/9.2], (response to Q1.1.4) in respect of the <i>Environmental Interrelationships and Mitigation Consequences Schedule</i>.
BEPS-PDA-046	Draft DCO Management Plans	Before any later dDCO hearing, BEPS additionally asks for a Consolidated Mitigation Route Map/mitigation-to-DCO audit linking each relied-upon mitigation measure to the precise Requirement, protective provision or certified document that secures it, including monitoring, remedial triggers and enforcement, together with clear controls for	The Applicant refers BEPS to the Commitments Register [AS-038], which has been prepared in line with PINS guidance Nationally Significant Infrastructure Projects: Commitments Register and is used as a signposting tool to track commitments made by the applicant throughout the NSIP planning process, with such commitments then secured in other documents. The Commitments Register sets out the securing mechanism for each commitment relied upon within the ES.

ID	Theme	Comments/Issues Raised	Applicant's Response
		replacement, cessation, decommissioning and successor liability.	
BEPS-PDA-047	DCO Process	6. New evidence, project changes and Statements of Common Ground BEPS requests that material new evidence should always be followed by a deadline at which other parties can make a considered response. Updated reports should identify what has changed and provide the underlying survey dates, methodology and mapping. If a Scheme element or mitigation package changes materially during Examination, including revisions made following the Inspectorate's Section 51 advice, the dDCO, legal plans and affected environmental/control documents must be revised consistently. A change should not be absorbed into one document while the rest of the application remains unchanged.	The Applicant notes this comment and considers that this is a matter for the Examining Authority. Where changes have been agreed with the relevant Interested Parties, the Applicant will update the relevant documentation to ensure that these changes are captured within the necessary application documents. The Guide to the Application [PDA-001] will be updated at each Deadline and updated documents will contain a 'Schedule of Changes' table within them each time they are updated.
BEPS-PDA-048	Statements of Common Ground	BEPS welcomes the requested SoCGs. We request that each should retain a prominent list of matters not agreed or outstanding, identify the action/evidence required, responsible party and target date, and record unresolved protective provisions or	The Applicant notes this comment. Statements of Common Ground are intended to provide a transparent record of the status of discussions between parties, including areas of agreement and matters that remain unresolved. Where matters are identified as being under discussion, this reflects ongoing engagement

ID	Theme	Comments/Issues Raised	Applicant's Response
		side agreements. 'Ongoing discussion' should not allow an objection to disappear from later versions.	between the Applicant and the relevant consultee with a view to seeking resolution where possible. If agreement cannot be reached, the matter will remain identified as outstanding within the SoCG and the Examination will ultimately determine the weight to be given to the parties' respective positions. SoCG's will also highlight, at each submission stage, the remaining principal areas of disagreement between the parties.
BEPS-PDA-049	Consultation and Engagement	7. Consultation adequacy and project-specific engagement As the application has passed acceptance, BEPS does not ask the ExA to revisit the acceptance decision at the Preliminary Meeting. It asks instead for a defined examination route for material consultation issues which remain relevant to the adequacy of the evidence and the fairness of the Examination. BEPS respectfully requests an early written question requiring the Applicant to respond to the consultation concerns raised by the host authorities, BEPS and relevant statutory and specialist consultees, together with an opportunity for those bodies to comment upon the Applicant's	The Applicant notes this request and refers to its response provided to all relevant representations, which can be found in the following documents: • The Applicant's Response to Relevant Representations Part 1 – Host and Neighbouring Authorities [PDA-008]; • The Applicant's Response to Relevant Representations Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [PDA-009]; • The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010];

ID	Theme	Comments/Issues Raised	Applicant's Response
		response. Where a consultee contends that it was not provided with sufficient, timely or accurate information about a material element or change to the Scheme, that consultee should be invited to explain the resulting consequences for its assessment, advice or outstanding position. The purpose would not be to reopen the section 55 acceptance decision. It would be to establish whether shortcomings in consultation have left material evidential consequences which remain unresolved in the Examination, including whether affected consultees were able to assess the Scheme ultimately submitted and whether subsequent design changes, surveys or mitigation have been adequately scrutinised. If material factual disputes remain after written exchanges, BEPS asks that they be addressed at an appropriate Issue Specific Hearing.	• The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]; and • The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]. Interested Parties will have the opportunity to comment on the Applicant's response to written and oral submissions during the examination, as set out in the Rule 8 letter [PD-007].
BEPS-PDA-050	The Applicant Funding Statement	BEPS also asks the ExA to identify the appropriate route for evidence concerning project-specific engagement between the Applicant/Macquarie, DESNZ and NESO, which we believe gives rise to a	As set out in the Applicants response to BEPS Relevant Representation [RR-0200], at BEPS-010 in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-

ID	Theme	Comments/Issues Raised	Applicant's Response
		serious appearance of bias in decision-making on East Pye Solar. (This same engagement issue has also been raised in the Light Valley Solar examination). The issue should be confined to any project-specific material relevant to East Pye's claimed need, grid alignment or facilitation, with disclosure of relevant Applicant-held documents, where relied upon. This avoids conflating the issue with a challenge to the merits of national policy.	010], the Applicant does not agree that the matters raised give rise to an appearance of bias in the determination of the Application and the nature of the Scheme's grid connection. No evidence has been provided that the meeting concerned the merits of the Scheme's Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment. A meeting in January 2025 between DESNZ officials, the Applicant and Macquarie took place in the context of the Department of Energy Security and Net Zero's (DESNZ) wider policy and delivery responsibilities relating to electricity network infrastructure and the connection of solar and BESS projects to the transmission system. Engagement between DESNZ officials, the Applicant and Macquarie on grid connection matters is consistent with the wider engagement that routinely takes place between government departments, developers, investors, network operators, and other stakeholders in relation to electricity network connections and reform, and does not in itself indicate bias, predetermination or preferential treatment. The Applicant notes that the assertions made in this Relevant Representation regarding the meeting are speculative and are not supported by evidence of bias. NESO has also commented

ID	Theme	Comments/Issues Raised	Applicant's Response
			publicly: <i>"NESO rejects any suggestion that its independent analysis or advice has been influenced by any individual developer. We engage regularly with stakeholders across the energy sector, but that engagement does not unduly influence NESO's objective advice or assessments"</i>. The Planning Act 2008 process includes safeguards intended to ensure that applications for development consent are considered fairly and on the basis of the evidence before the decision maker.
BEPS-PDA-051	Site Inspections	8. Site inspection, document accessibility and participation BEPS requests a November leaf-off site inspection. A separate Procedural Deadline A site-inspection schedule will identify a preliminary list of locations with features to be observed. BEPS also asks that current plans be available as legible conventional PDFs; all amended documents carry clear version/date identifiers; hearing agendas be issued as early as practicable; and community parties are not required to reconstruct the current Scheme from	The Applicant notes this and has considered BEPS suggestions for Site Inspection locations within the Applicants Draft Itinerary for the Accompanied Site Inspection [EN0110014/EXAM/9.1]. All plans submitted by the Applicant include version and date identifiers and have been prepared to maximise legibility whilst retaining the level of detail necessary to accurately present the required information. The Guide to the Application [PDA-001] shows where documents have been superseded. This document has been updated for Deadline 1 and will be provided at each Deadline.

ID	Theme	Comments/Issues Raised	Applicant's Response
		multiple superseded plans and correction documents.	
BEPS-PDA-052	Concluding Remarks	9. Conclusion The central procedural risk is fragmentation. The Examination should establish, in a coherent sequence: • what development is actually authorised; • which parts are genuinely deliverable; • which land and powers are therefore necessary; • whether the environmental baseline is sufficient; • whether mitigation relied upon is effective and secured; and • whether changes made to solve one topic create unassessed effects in another. BEPS respectfully asks the ExA to structure the Examination so those questions are resolved during the Examination, not deferred beyond it.	The Applicant has provided responses to these matters within reference IDs BEPS-PDA-041 to BEPS-PDA-051 above.

Table 2.1 Great Moulton Action Group [\[PDA-049\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
GMAG-PDA-001	General Remarks	I speak today on behalf of the Great Moulton Action Group. Our community supports renewable energy, but we will not accept a proposal that forces multiple high-risk, high-impact infrastructures into one small rural village without proper assessment, justification, or transparency. What is being asked of Great Moulton is unreasonable, unsafe, and unjustifiable.	The Applicant notes this comment.
GMAG-PDA-002	Cumulative and In-Combination Effects	Let us be clear: this is not a solar farm. It is an industrial complex. Multiple solar sites , a Battery Energy Storage System, a project substation, a National Grid substation, a construction compound, and a cable corridor cutting directly through our village. No rural community anywhere in the country has been asked to absorb this level of industrialisation in such a confined area. Yet Great Moulton is being treated as if it is an empty space on a map.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations - Part 3 [PDA-010] under comment ID GMAG-233.
GMAG-PDA-003	Scheme Description	Across the developer's documentation, the most serious failure is obvious: impacts have been deliberately separated to make them appear smaller.	In line with standard EIA practice, the assessments within the ES are presented within respective topic chapters. The Applicant has considered topics within the EIA that have potential for likely significant environmental effects, and the scope of

ID	Theme	Comments/Issues Raised	Applicant's Response
			topics to be assessed within the ES were agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]). The Applicant has transparently presented impacts, with ES Volume 1, Chapter 20 – Summary of Significant Residual Effects [APP-056] summarising the significant residual effects of the Scheme. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment.
GMAG-PDA-004	Noise and Vibration Cumulative and In-Combination Effects	There is no cumulative noise modelling for three substations operating together.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations - Part 3 [PDA-010] under comment ID GMAG-235.
GMAG-PDA-005	Transport and Access	No cumulative traffic modelling for narrow rural roads with no footpaths.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment ID GMAG-238.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Cumulative and In-Combination Effects		
GMAG-PDA-006	Landscape and Visual Cumulative and In-Combination Effects	No cumulative visual assessment of tall buildings, fencing, lighting, battery units, and expanded pylons.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment ID GMAG-234.
GMAG-PDA-007	Cultural Heritage Cumulative and In-Combination Effects	No cumulative heritage assessment.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment ID GMAG-243
GMAG-PDA-008	PRoWs and Recreation Cumulative and In-Combination Effects	No cumulative safety assessment for equestrians and pedestrians who rely on these lanes daily.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comments GMAG-135 and GMAG-188; and BEPS-361 in the same document.
GMAG-PDA-009	Cumulative and In-Combination Effects	Residents will experience these impacts all at once. The developer has chosen to assess them one by one. That is not a technical gap — it is a structural omission that hides the true scale of harm.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment ID GMAG-243.

ID	Theme	Comments/Issues Raised	Applicant's Response
GMAG-PDA-010	Site Selection	It is also clear that Great Moulton was not chosen because it is suitable. It was chosen because landowners signed up. Other areas were considered first. Our community did not choose this. We did not influence the siting. And National Grid have not confirmed that this is the final location for their infrastructure. We are being positioned as the path of least resistance — not the right location.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment IDs GMAG-023 - GMAG-026.
GMAG-PDA-011	BESS Safety Major Accidents and Disasters	The BESS is a major industrial hazard placed close to homes and public rights of way. Fire safety, noise, lighting, and long-term reliability are not minor details. They are fundamental to whether this facility can safely exist in a rural village. The developer has not provided the information needed to demonstrate that it can. That is unacceptable.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] under comment ID GMAG-250.
GMAG-PDA-012	Grid Connection	The National Grid substation is the most intrusive and permanent part of the entire scheme, yet it is also the least defined. No detailed plans. No visualisations. No safety information. No clarity on its long-term footprint. This level of uncertainty for infrastructure of national significance is extraordinary. It has caused widespread	The Applicant has submitted an illustrative visualisation of the National Grid substation at Deadline 1 within an updated ES Volume 3, Appendix 4.1 – Illustrative Technical Information [EN0110014/APP/6.3.4.1] . The National Grid substation parameters are defined in Design Principles, Parameters and Commitments [APP-213] , Table 4.4 Work No.4

ID	Theme	Comments/Issues Raised	Applicant's Response
		anxiety and it undermines any claim that this proposal is ready for examination.	and secured by the Draft DCO [AS-032] . This includes the maximum compound area of 6ha. Ultimately the configuration of the substation is at National Grid's discretion and as such the Applicant is seeking a consent that allows National Grid to complete their works.
GMAG-PDA-013	PRoWs and Recreation Soils and Agricultural Land Transport and Access	The wider impacts are equally severe. Public Rights of Way would be cut or diverted, removing safe off-road access for walkers, riders, and families. Best and Most Versatile farmland would be permanently lost. Sensitive groundwater areas would be built over without clear safeguards. Heritage settings would be altered. Rural lanes would carry heavy construction traffic far beyond what they were designed for. These are not temporary inconveniences — they are permanent losses that will reshape our village for decades.	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] . The Applicant refers to the following comment IDs: • Public Rights of Way and recreation – GMAG-135 and GMAG-188; • Soils and agricultural Land – GMAG-202, GMAG-204 and GMAG-214; • Groundwater – GMAG-058, GMAG-059, GMAG-085 and GMAG-088. • Construction traffic – GMAG-201; and • Heritage assets – GMAG-257 and GMAG-270.
GMAG-PDA-014	Cumulative and In-Combination Effects	Individually, each of these impacts is serious. Together, they represent a complete and irreversible transformation of our landscape, our daily lives, and our	The Applicant refers to its response to Great Moulton Action Group's relevant representation [RR-0705] in The Applicant's Response to Relevant Representations -Part 3 [PDA-010] . The Applicant refers to comment IDs GMAG-246

ID	Theme	Comments/Issues Raised	Applicant's Response
		sense of place. No amount of mitigation can disguise that.	as well as the responses provided at GMAG-PDA-002 to GMAG-PDA-009.
GMAG-PDA-015	Community Impact	Our community has engaged throughout this process. We have reviewed the BEPS report and support its findings. We have produced our own detailed objection, grounded in evidence and lived experience. We reject the idea that rural communities should carry a disproportionate burden for renewable energy, especially when the cumulative impacts have not been properly assessed and meaningful alternatives have not been explored.	The Applicant notes this comment and refers to its responses provided to GMAG-PDA-001 to GMAG-PDA-015.
GMAG-PDA-016	Concluding Remarks	Great Moulton does not consent to this level of industrialisation. We ask the Planning Inspectorate to recognise that cumulative harm is not hypothetical — it is real, measurable, and already evident in the gaps and omissions within the developer's own documentation. We urge you to consider the full picture and conclude that this scheme, in its current form, is not compatible with a fair, safe, or balanced approach to development.	The Applicant notes this comment and refers to its responses provided to GMAG-PDA-001 to GMAG-PDA-015.

Table 2.2 South Norfolk Tree Warden Network [\[PDA-066\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
SNTWN-PDA-001	DCO Process Arboriculture	Process concern: risk of examination proceeding ahead of a settled evidence base (Trees) Ross Jolliffe, Co-ordinator SNTWN, registration identification number: F658FD3BF NPS EN-1 4.2.12 states that applicants must ensure that applications are ready to be examined before an application is made. The Planning Act 2008 system is designed to be frontloaded and applications should not enter the statutory system if they are not ready to be consented. It also states that examination should not be used to address deficiencies in the application. The South Norfolk Tree Warden Network is concerned that, without a structured mechanism to require resolution on a fixed timetable, the examination risks reaching Deadline 1, and ultimately the Examining Authority's recommendation, on a substantial but uncertain evidence base. We cannot ascertain the true extent of damage to the arboricultural	The true extent of impacts to the arboricultural environment; and mitigation, have been included in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. 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].

ID	Theme	Comments/Issues Raised	Applicant's Response
		environment or mitigation from documents to date.	
SNTWN-PDA-002	Ecology and Biodiversity	The Examining Authority has already recognised an analogous risk for white-clawed crayfish survey evidence (Rule 6 Letter, Annex F, item 9a), directing the Applicant to provide a methodology-explained update before examination commences. The Network requests that examination proceeds only on the basis that a complete ecological update is available and in line with regulation and NPS EN-1, rather than leaving arguments and resolution to an uncertain iteration within the examination process or later in the project, when urgency and practical issues may lead to regrettable practice and ultimately increase the risk of avoidable ecological damage including disturbance, avoidable or unexpected tree felling and loss of habitat, disease introduction, landscape deterioration, slow decline of damaged trees, avoidable or unexpected hedgerow removal etc.	The Applicant notes the Examining Authority's (ExA) request, in the Rule 6 letter [PD-005]. The Applicant has provided an update on this at Procedural Deadline A within the document Applicants Position on White Clawed Crayfish [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.
SNTWN-PDA-003	Arboriculture	The East Pye evidence base concentrates upon protected trees and species within the insufficient environmental statement, but obviously there are innumerable less	The Applicant is committed to retaining trees and hedgerows as far as practicable, with all arboricultural features taken into consideration in the design process. As set out in the Outline

ID	Theme	Comments/Issues Raised	Applicant's Response
		impressive trees and inter-dependent arboricultural features that are equally vulnerable to harm within the order limits.	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. 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]. Tree protection fencing will be erected around the Root Protection Areas (RPA) of retained tree features to protect these trees from harm.
SNTWN-PDA-004	Arboriculture	Attachment one: Trees at Risk, representation 2, planning process, evidence presented for the South Norfolk Tree Warden Network: Ross Jolliffe, Co-ordinator SNTWN, registration identification number: F658FD3BF Following my Relevant Representation, 'South Norfolk Tree Warden Network' I further object to the East Pye Solar proposal with the following <u>additional evidence and points</u>, mainly arising from uncertainty. I note that under the National Policy Statement for Energy (NPS EN-1) 5.4.55, the Secretary of State should not	There would be no loss of Ancient Woodland, ancient or veteran trees as secured through the Outline CEMP [APP-196].

ID	Theme	Comments/Issues Raised	Applicant's Response
		grant consent for development resulting in loss or deterioration of ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. Given the documented uncertainties in the Applicant's own evidence base, the Applicant has not discharged the burden EN-1 4.3.10–4.3.12 places on it to properly assess worst-case impacts.	
SNTWN-PDA-005	Arboriculture	1. veteran and ancient trees get particular emphasis. Please clarify whether other tree categories of habitat or other conservation value (including under BS5837 guidance) have been identified and then considered for protection in the same way as veteran or ancient trees – I note that the physical survey has mapped them;	BS5837:2012 Category A and B trees have been identified and prioritised for retention and avoidance of pruning works, but their importance is not the same as ancient or veteran trees as the habitat of ancient or veteran trees are irreplaceable and will be protected within a larger buffer zone (15x tree stem diameter or 5 metres from the edge of the tree's canopy) than other trees (12x tree stem diameter, capped at 15m radius) under strict control of protection measures. As set out in the Outline CEMP [APP-196] , where tree removal is unavoidable, trees of lower quality and life expectancy (BS5837:2012 Category U and C trees) will be preferably removed over those of higher quality and life expectancy (BS5837:2012 Category A and B trees).

ID	Theme	Comments/Issues Raised	Applicant's Response
SNTWN-PDA-006	Arboriculture	2. please clarify whether any 'category c' or 'category u' trees will be properly considered for ecological habitat contributions (including but not limited to roosting birds and animals) before disturbance or removal;	Outline measures detailed within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] provide mitigation to avoid impacts upon protected species, this includes commitment to species-specific pre-vegetation clearance surveys/checks/avoidance actions.
SNTWN-PDA-007	Arboriculture	3. the order limits enclose an area so large, that to exclude consideration of impacts over a wider appears questionable in ecological terms. For example, I understand that a 2km species search radius and 10km for European Sites is convention, when conforming to guidance and regulations but that it is not a legal maximum. Please clarify whether these limitations are reasonable given that highly mobile species will be affected;	These measurements are not considered legal maximums or minimums, and the consideration of zones of influence (and attributable desk based studies required in an Ecological Impact Assessment) is designed to be proportionate to the scale of the development and complexity of its potential for significant effects. The approach to relevant zones of influence (and associated desk-based studies and field survey effort) has been based on the above approach, professional knowledge and experience, agreement with statutory consultees, and through the statutory EIA Scoping process, in adherence to the guidance provided within the <i>Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3</i> (CIIEM. 2018).
SNTWN-PDA-008	Arboriculture	4. appendix 7.10 states its findings are valid for a maximum of two years from inspection (the surveys ran from 2024 to	The Applicant is committed to undertaking a further pre-construction tree survey and Arboricultural Method Statement prior to construction to inform

ID	Theme	Comments/Issues Raised	Applicant's Response
		2026). Chapter 4 anticipates construction starting 2028, when its arboricultural evidence base is likely to have expired. Please clarify how subsequent arrangements will manage the implied obsolescence?	the tree protection zones to be applied during construction as set out in the Outline CEMP [APP-196] .
SNTWN-PDA-009	Arboriculture	5. the Environmental Statement Appendix 7.10 (Preliminary Arboricultural Impact Assessment), 1.5.18 states plainly that trenchless crossings will pass beneath named individual trees, appendix 7.2 (Landscape Baseline), 2.4.7 (and elsewhere) implies that a "trenchless solution" to cable installation as self-evidently benign. The Outline Cable Route Construction Statement refers to the Outline Construction Environmental Management Plan for the detail of root management (and both that and Appendix 7.10 most often refer to structural roots, as if other root parts essential to the trees' health were not important). All this read, documents do not give assurance that the healthcritical fine/absorptive roots and mycorrhizal fungal networks etc will be mapped and protected in the same way as above ground features of similar importance;	The Applicant makes note of this comment and understands the concerns on potential arboricultural impacts from the trenchless crossings. Therefore, the proposed depth of 1m under RPA set out in the Outline CEMP [APP-196] will be updated at Deadline 2 to a minimum depth of 4m between the ground level and the outer diameter of the bore for trenchless excavation beneath ancient or veteran tree buffers, i.e. veteran hedgerow H52, and a minimum depth of 3m is maintained from the outer diameter of the bore and the ground level for all other trees to be retained and subject to soil type, site location and proximity to tree centres, in consultation with the project Arboriculturist and engineer.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Arboriculturist supervision is a good point, but it would be very difficult to prove that is sufficient owing to invisibility, unknown root structure, soil variation, future effect of tunnels, backfill contaminations by trenching chemicals etc. It is unclear whether any arboricultural oversight applies to the trenchless operation itself, and no mechanism has been identified for verifying that the 1m clearance suggested is adequate given the apparently unmapped root structure. I have been unable to find assurance that trees are unaffected by tunnelling materials like bentonite, 'bore-gel' and 'EZ mud.	
SNTWN-PDA-010	Arboriculture	6. please confirm that the Appendix 7.10 survey methodology include specific criteria for identifying ancient coppice stools (as opposed to single-stem veteran trees), and were any such stools identified within or adjacent to the Order Limits? (Appendix 8.1 confirms coppice stools are present in the immediately adjacent Ancient Woodlands at Pope's Wood, Spring Wood, and Saxlingham Grove and my own observations of such trees around the Saxlingham area suggest that veteran/ancient coppiced stools are	The Applicant confirms that the survey methodology includes the identification of ancient coppice stools. One ancient coppice T234 within the hedgerow has been identified adjacent to the Order Limits in the survey. Any coppice stools present in the Ancient Woodlands will be protected by the 30m ancient woodland buffer as set out in the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Comments/Issues Raised	Applicant's Response
		present in hedgerows throughout the order limits, some of which might be recently managed and so present as trees already cut down.) Coppiced stools in hedgerows may be particularly valuable, especially in impoverished hedgerows and simultaneously vulnerable to removal or damage;	
SNTWN-PDA-011	Arboriculture	7. documents contain, for example, landscape visualisations, but no photos of trees scheduled for removal or other damage and public access to view them may be difficult. Because the NSIP process relies largely on written information, I suggest that the Applicant provide photographic records for the trees scheduled for full or partial removal and those subject to trenchless crossing; A further benefit to such visualisation is that, in any future maintenance plan or tree health dispute, a photographic record (captioned with position and other details) would help managers and officials verify condition at the time of survey, which the written description alone doesn't allow;	Photos of trees will not be provided as not all tree photos were taken during the survey. The observations or comments column in the tree survey schedule has already included a very detailed description on the tree health conditions prior to the works commencement.
SNTWN-PDA-012	Arboriculture	8. future tree/soil monitoring, maintenance and new planting/measures establishment	The Applicant notes this comment and has amended paragraph 4.3.6 of the Outline

ID	Theme	Comments/Issues Raised	Applicant's Response
		reports are mentioned in the impact arboriculture assessment, appendix 7.10 and/or in management plans. I suggest committing the Applicant and any future site owners to sending report copies to the relevant authorities (probably South Norfolk Council and the parish councils). Similarly, the relevant authorities need a mechanism to report problematical observations (e.g. of their officers or tree wardens) that would trigger an arboricultural assessment. For written reports and problem reporting, a commitment to take action where mitigation is needed and a process to deal with dispute would be necessary;	LEMP [APP-199] to include the following italicised text: "The LEMP secured by Requirement 7 of the draft DCO [EN0110014/APP/3.1] will establish regular monitoring activities and adoption of robust landscape management and ecological records being kept. These findings will support any future LEMP updates <i>and will be shared with the relevant planning authority upon request.</i>" The Applicant considers this to be sufficient given the obligations to comply with any Order that is granted and documents secured by Requirements therein.
SNTWN-PDA-013	Arboriculture	9. please clarify the number of trees to be removed, modified or otherwise affected. I am unable to do that because numbers vary, and woods appear to be counted as if they were one tree: Count A — Appendix 7.10 (Arboricultural impact...), Executive Summary and Section 1.2: Stated twice, in almost the same words, both times giving a total of 70: "A search of the Woodland Trust Ancient Tree Inventory found 39 ancient or veteran	To clarify, the Applicant is committed to no removal of ancient or veteran trees. The number of ancient or veteran tree features identified to be retained and protected within or adjacent to the Order Limits is 70 individual trees, one group of trees and one hedgerow, total 72 tree features. Count A – The Executive Summary only counts for the total number of 'individual trees' identified as ancient or veteran but does not include other tree feature types such as 'group' and 'hedgerow'. Further details on all the surveyed ancient or

ID	Theme	Comments/Issues Raised	Applicant's Response
		trees within or adjacent to the Site. The survey found a further 31 trees, one group of trees and one hedgerow [that] exhibit ancient or veteran characteristics." (1.2.40) The Executive Summary (1.1.3) repeats this but drops the "one group... and one hedgerow" detail, describing the 31 as simply "31 trees". Count B — Appendix 7.10, Conclusions section: The same report, same total of 70, but now split differently: "A total of 70 ancient or veteran trees... consisting of 56 individual trees identified during the survey as ancient or veteran trees and 14 individual trees designated as ancient or veteran in the [Woodland Trust Ancient Tree Inventory]." (1.8.2) Count A says 39 trees came from the Woodland Trust database and 31 were found by the surveyors on site. Count B says 14 came from the database and 56 were found on site. Count C — Appendix 8.1 (Ecological Desk Study...), Table 4, arrives at a total of 70 — but by a third method:	veteran tree features are expanded in paragraph 1.2.40. Count B – A total of 56 ancient or veteran trees included in our tree survey results (recorded in both tree survey schedule and Tree Constraints Plan) as they were identified during the survey, including 31 trees found by the surveyors on site and 25 trees surveyed and recorded in the Woodland Trust Ancient Tree Inventory (ATI). The Applicant has also added in 14 additional trees recently recorded in the ATI (post the Applicants arboriculture surveys) (details provided in Table 1.2) to the Tree Constraints Plan to ensure no ancient or veteran trees buffer zones are impacted. Count C – The Ecological Desk Study & Baseline Report utilised multiple sources to acquire desk study data. The data sets available on the ATI and those provided by Norfolk Biodiversity Information Service did vary, however it was agreed that the figure of 70 ancient/veteran trees were present either within the Order Limits or within a 30m buffer of the Order Limits. The totals in Table 1.7 do not add up because T11 and T14 would be impacted by both permanent access and access tracks and double counted, therefore the sum should be 19 minus 2 (double-counted trees) equals to a total of 17 conflicts of

ID	Theme	Comments/Issues Raised	Applicant's Response
		"There are 49 trees with veteran features recorded within the Order Limits and a further 21 within 30m of the site boundary." (Table 4) and, a sum of 52... "In addition, veteran (or ancient) trees are also categorised as 'irreplaceable habitat' under the NPPF and Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Norfolk Biodiversity Information Service provided 544 records of veteran trees within the 2km search radius, 46 of these being located within the Sites and a further six being located within the CRC route [Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]. Further details of important trees are provided within the arboricultural impact assessment for the scheme." (3.4.3) Further to these counts, Appendix 7.10, Table 1.7 further confuses the reader both by listing individual trees and an ancient woodland, apparently as one tree, and then arriving at a different total (17) (but the sums in terms of rows and totals column do not add-up consistently);	ancient and veteran trees and ancient woodlands, including 16 ancient and veteran trees and 1 ancient woodland.
SNTWN-PDA-014	Arboriculture	10. the 2026 summer has been extraordinarily dry and extremely	The Applicant acknowledges this comment and will take the climate change factor into considerations

ID	Theme	Comments/Issues Raised	Applicant's Response
		challenging for plant life, including trees. I suggest assessment of that factor against normal mature tree resilience assumptions before mitigations are finalised and work commences.	for mitigation planting, as set out within the prescriptions and targets for each enhancement measure outlined within the Outline LEMP [APP-199] .
SNTWN-PDA-015	Arboriculture	11. I have stated before that any particular number of planted trees can't mitigate the loss of mature habitat trees, however, where trees or other flora are to be planted, I'd like to suggest a mandate that: local sapling stock and seed is used and maintained (weeded, watered); that properly maintained natural tree regeneration also be considered and; protection of planted trees only by natural fibre mats, spirals, tubes etc. This request is to keep local species genetically consistent and to prevent the importation of diseases, especially from foreign sources (in the manner that ash dieback (<i>Hymenoscyphus fraxineus</i>) was probably imported). There should be plenty of time for planting and post-planting care to be properly planned and sourced to avoid late sourcing plans and the common problem of rows of plastic spirals containing dead twigs littering the countryside and later disease problems.	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]. The Applicant notes the suggestion that local sapling stock and seed should be used where planting is proposed, alongside appropriate establishment and maintenance measures. The Applicant Outline LEMP [APP-199] stated that "The seed origin of all native shrub species for use on the Scheme shall be sourced, as far as reasonably practical, from the Forestry Commission Local Seed Zones 406 (Forestry Commission Practice Note 8: Using Local Stock for Planting Native Trees and Shrubs). Written

ID	Theme	Comments/Issues Raised	Applicant's Response
			evidence of provenance shall be provided.” And “All species supplied as transplant, cell-grown or container grown stock are to be of the most local provenance available.” Further detail to secure stocks will be developed during the detail LEMP. 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].

3 The Applicant's Responses to Procedural Deadline A Submissions Submitted by Parish Councils

Table 3.1 Brooke Parish Council [\[PDA-036\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
BPC-PDA-001	Cultural Heritage	Heritage Brooke Parish Council wishes to comment on heritage and Ecology weaknesses in statements provided by East Pye Solar. focused on the identified weaknesses in the Site 9 Heritage Statement. Consultation Comments on Site 9 (Brooke) Heritage Assessment Comment 1: Reliance on Existing Vegetation Screening The assessment's conclusion of "no harm" relies heavily on the presence of existing mature trees, hedgerows and vegetation screening around Brooke Conservation Area, Waterfield Cottage, Oldhouse Farmhouse and Littlebeck Farmhouse. The assessment does not explain how these screening features will be secured, managed and maintained throughout the operational life of the solar farm. No	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-010 and BPC-018. 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], Outline LEMP [APP-199] and Outline DEMP [APP-198] that are secured through Requirements 7, 13, 14 and 21 of the Draft DCO [APP-017].

ID	Theme	Comments/Issues Raised	Applicant's Response
		assessment is provided of the potential effects of vegetation loss through disease, storm damage, ageing, or future management practices. The applicant should provide a robust long-term landscape management plan and demonstrate that the conclusions of negligible heritage impact remain valid under winter and reduced screening scenarios.	To confirm, the approach taken is as set out in the Design Principles, Parameters and Commitments [APP-213] .
BPC-PDA-002	Cultural Heritage	Comment 2: Lack of Heritage-Led Mitigation The Heritage Statement explicitly states that the exclusion of certain fields from development was "not specifically heritage-led". While this approach may reduce impacts, it suggests that heritage considerations have not been a primary driver of the final design. Additional justification should be provided to demonstrate that opportunities for heritage-led design optimisation have been fully explored. Consideration should be given to specific mitigation measures aimed at conserving the setting of nearby heritage assets, particularly Brooke & Kirstead Conservation Area.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-010.

ID	Theme	Comments/Issues Raised	Applicant's Response
BPC-PDA-003	Landscape and Visual	Comment 3: Insufficient Assessment of Winter Visibility The assessment acknowledges the existence of occasional and filtered views between Site 9 and nearby heritage assets, particularly during periods when vegetation cover is reduced. However, no detailed assessment of winter or leaf-off visibility has been presented. The absence of seasonal visualisations, photomontages, or a worst-case assessment limits confidence in the conclusion that no harm would arise. Additional evidence should be provided demonstrating the appearance of the scheme from relevant heritage receptors during winter conditions.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-010. Both winter and summer surveys were carried out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], baseline winter photography was captured during January and February 2025 when there is no leaf to represent the worst-case assessment. The photographs and visualisations are presented in ES Volume 3, Appendix 7.5 - Photosheets - Site 9 [APP-133] and Figure 7.6.9 Visualisations - Site 9 [APP-145].
BPC-PDA-004	Landscape and Visual Cultural Heritage	Comment 4: Impact on the Rural Setting of Brooke Conservation Area The Conservation Area Appraisal identifies the rural landscape surrounding Brooke, particularly to the south, as an important component of the Conservation Area's setting. While the Heritage Statement concludes that solar arrays within two fields would not affect appreciation of this landscape, the assessment does not fully explain how the introduction of modern energy infrastructure would preserve the	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-018.

ID	Theme	Comments/Issues Raised	Applicant's Response
		open agricultural character identified as significant within the appraisal. Greater analysis should be provided regarding the contribution of the southern rural backdrop to the significance of the Conservation Area and whether the proposed development would alter that character, even where visibility is limited.	
BPC-PDA-005	Cumulative and In-Combination Effects	Comment 5: Lack of Assessment of Cumulative Change The assessment focuses on the effects of Site 9 in isolation and does not clearly address whether the introduction of solar infrastructure, fencing, inverter stations, access tracks and associated infrastructure could contribute to cumulative changes in the rural landscape experienced from heritage assets over time. A cumulative assessment should be provided to demonstrate how the proposal would interact with other existing or proposed developments in the surrounding countryside.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-011.
BPC-PDA-006	Management Plans	Comment 6: Absence of Monitoring and Review Commitments The assessment proposes new boundary planting as mitigation but contains no	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] . Further

ID	Theme	Comments/Issues Raised	Applicant's Response
		commitment to post-construction monitoring, replacement planting, or review mechanisms should screening prove ineffective. Given that the conclusions of no harm rely substantially on landscape screening, a monitoring programme should be secured through appropriate planning conditions to ensure that mitigation remains effective throughout the operational life of the development.	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] .
BPC-PDA-007	Cultural Heritage	Summary of Heritage Assets impact: Whilst the Heritage Statement concludes that the scheme would result in no harm to the significance of designated heritage assets, the assessment relies heavily on existing screening and contains limited heritage-specific mitigation. Further evidence is required regarding seasonal visibility, long-term landscape management, cumulative effects and the protection of the rural setting of Brooke & Kirstead Conservation Area before the conclusion of no harm can be fully substantiated.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-010.
BPC-PDA-008	Ecology and Biodiversity	Ecology and Biodiversity Summary for East Pye Solar Site 9 (Brooke)	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and

ID	Theme	Comments/Issues Raised	Applicant's Response
		Site 9 is one of the solar development parcels assessed within the Ecology and Biodiversity Environmental Statement. The ecological assessment identifies a number of habitats, designated wildlife sites and protected species that could be affected by construction, operation and decommissioning of the solar farm. The overall conclusion of the chapter is that impacts can generally be reduced through embedded mitigation, habitat retention and biodiversity enhancement measures.	Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015.
BPC-PDA-009	Ecology and Biodiversity	Ecological Receptors Near Site 9 The Environmental Statement identifies several non-statutory wildlife sites close to Site 9, including: • Brooke Wood County Wildlife Site (CWS) approximately 0.1 km west of Site 9. • Nunn's Grove CWS approximately 0.5 km south-west of Site 9. • Park Plantation CWS approximately 0.4 km east of Site 9. • Church Road Wood CWS approximately 0.9 km west of Site 9.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-016 and BPC-016.

ID	Theme	Comments/Issues Raised	Applicant's Response
		- Kirstead Hall Wood CWS approximately 1.2 km north-east of Site 9. - Atlas Gravel Working CWS approximately 1.9 km north of Site 9. These woodland sites are particularly important because they provide habitat connectivity, bat foraging habitat and ecological networks in the Brooke landscape.	
BPC-PDA-010	Ecology and Biodiversity	Main Environmental Impacts Identified 1. Loss and Modification of Arable Habitat Site 9 currently comprises predominantly arable farmland. Installation of solar panels would alter the character of this habitat and reduce its value for some farmland species during construction. However, the scheme proposes retention of field margins, hedgerows and grassland management beneath panels, which is expected to improve biodiversity relative to intensive agriculture in the longer term.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-016.
BPC-PDA-012	Ecology and Biodiversity	2. Effects on Breeding Birds The wider scheme supports breeding populations of several red-listed farmland birds including:	The Applicant has provided detailed response in relation to breeding farmland birds. The Applicant refers to its response in The Applicant Response

ID	Theme	Comments/Issues Raised	Applicant's Response
		• Skylark • Linnet • Yellowhammer The Environmental Statement recognises open arable fields as important breeding habitat for these species. Construction activities and land-use change may result in disturbance and habitat loss for breeding birds. Embedded mitigation, habitat retention and management measures are proposed to reduce these effects. For Site 9, the principal concern would be the loss or alteration of open-field habitat used by farmland birds that depend on large expanses of arable land.	to Relevant Representations - Part 3 [PDA-011] under comment IDS SPC-010, and SPC-069.
BPC-PDA-013	Ecology and Biodiversity	3. Impacts on Bats Bats are identified as one of the most sensitive ecological receptors across the scheme area. Survey work recorded: • Eleven bat species. • Barbastelle bats at every survey location.	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015.

ID	Theme	Comments/Issues Raised	Applicant's Response
		- High levels of barbastelle activity across the overall project area. Potential impacts include: - Disturbance during construction. - Removal or alteration of commuting corridors. - Lighting impacts. - Changes to foraging habitat. The assessment notes that bats were of national ecological importance within the project area.	
BPC-PDA-014	Ecology and Biodiversity	Barbastelle Bats and the 6 km / Core Sustenance Zone Issue A particularly important finding is that the East Pye Solar Order Limits fall within the published Core Sustenance Zones (CSZs) of multiple known barbastelle maternity colonies. The report states that: - The Order Limits lie within the published 6 km Core Sustenance Zones of nine known barbastelle maternity colonies. - Maternity colonies at Tyrrells Wood, Little Wood, Brooke Wood, Spring	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Wood and Saxlingham Grove are identified as nearby colonies. • THE COMBINED CSZS FROM THESE COLONIES COVER THE ENTIRE PROJECT AREA. For Site 9 specifically, the proximity of: • Brooke Wood CWS (0.1 km west), • Nunn's Grove CWS, • Church Road Wood CWS, • Kirstead Hall Wood CWS, indicates that the site lies within a landscape heavily used by woodland-associated bats.	
BPC-PDA-015	Ecology and Biodiversity	Comment on the 5 km Exclusion Zone Although the document refers primarily to a 6 km Core Sustenance Zone, this is more precautionary than the commonly cited 5 km foraging range often used when assessing impacts on barbastelle maternity colonies. Because Site 9 lies: • within the published CSZ network,	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• adjacent to known woodland foraging habitat, • and within a landscape where barbastelles were widely recorded, it can reasonably be considered to fall within the key feeding landscape of local barbastelle populations. This means that habitat changes at Site 9 should be considered not merely as local ecological effects, but potentially as impacts on the supporting habitat of nationally important barbastelle populations.	
BPC-PDA-016	Ecology and Biodiversity	Conservation Status of Barbastelle Bats The Environmental Statement describes the barbastelle as: • protected under the Conservation of Habitats and Species Regulations 2017; • protected under the Wildlife and Countryside Act 1981; • an Annex II species under the Habitats Regulations framework; • a Priority Species;	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• a Norfolk Biodiversity Action Plan species; • classified as Vulnerable in the UK by the IUCN. The report further notes that: • the species is nationally rare; • East Anglia is a recognised national stronghold; • Norfolk is especially important for the species. Significance for Site 9 Given: • the proximity of known barbastelle roost woodlands, • the presence of nearby woodland wildlife sites, • the site's location within overlapping CSZs, • and the species' vulnerable conservation status, barbastelle bats represent one of the most important ecological receptors relevant to Site 9. The Environmental Statement	

ID	Theme	Comments/Issues Raised	Applicant's Response
		ultimately concludes that mitigation measures can avoid significant effects, but the baseline evidence confirms that Site 9 sits within a landscape of high importance for barbastelle bat feeding and commuting activity, which cannot be mitigated as it consists mainly of ancient mature woodland, which is impossible to achieve within the timeframe of the construction period of the project.	
BPC-PDA-017	Ecology and Biodiversity	Ecological Impact Summary The Ecology and Biodiversity ES confirms that the East Pye Solar Order Limits fall within the Core Sustenance Zones of nine known barbastelle maternity colonies and that barbastelle bats were recorded throughout the survey area. Given that Site 9 lies within the functional feeding landscape of a nationally important and IUCNVulnerable species, further justification should be provided demonstrating that the conversion of arable land to solar infrastructure must not adversely affect foraging habitat quality, commuting behaviour, or the integrity of nearby maternity colonies. While Brooke Parish Council accepts that development with a Core 6 km Sustenance	The Applicant refers to its response provided to Brooke Parish Council's relevant representation [RR-0216] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BPC-015. Further responses can also be viewed in The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] under comment ID BEPS 012, and BEPS 064.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Zone is not in itself an offence, we argue that the legal issue is not presence but adequacy of assessment and protection. We require further assessment by EPS of: • Review of Appendix 8.6 (Bat Surveys). • Review of the Protected Species Mitigation Strategy. • Review of the Habitats Regulations Assessment (if produced). • Review of Natural England's consultation response. • Evidence that habitat loss or disturbance would materially affect colony viability or conservation status. In order to properly assess habitat dependence, colony-level impacts, cumulative effects, landscape connectivity, and conservation status outcomes.	

Table 3.2 Morningthorpe and Fritton Parish Council [\[PDA-035\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
MFPC-PDA-001	Opening Remarks	Morningthorpe and Fritton Parish Council welcomes the opportunity to respond to the Rule 6 letter and wishes to make the following requests concerning the scope of the Examination, Issue Specific Hearing 1 ("ISH1").	The Applicant notes this comment and has provided responses to Morningthorpe and Fritton Parish Council's requests below.
MFPC-PDA-002	Scheme Description	Matters requiring particular scrutiny The Parish Council respectfully requests that the Examination gives particular scrutiny to: Whether Site 5 is an appropriate and adequately justified location for the proposed 400 kV Project Substation and associated solar infrastructure, including tracker panels of up to 4.5m in height, having regard to the combined scale, extent and character of the development and whether its siting accords with the relevant provisions of EN-5 concerning site selection, land-use effects, landscape and visual effects, screening and mitigation;	As set out within the Grid Connection Statement [APP-207] Paragraph 3.1.3, the location of the 400 kV Project Substation in Sub-Site 5A is directly informed by the technical configuration of the Grid Connection Infrastructure. There is a requirement to accommodate circuits from Sites 3, 4, 5, 7, 8, 9 and 10 to connect into the Site 5 400kV Substation. Circuits will then run from Site 5 down to the 400kV Project Substation and then, via a 400kV cable, into the new National Grid Substation where the Scheme will connect to the NETS. ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], Table 5.1: Summary of Key Design Changes through the Evolution of the Scheme, sets out that, at Stage 1, consideration was given to a 400kV Project Substation in Site 5, with initial considerations relating to key policy tests, environmental and community constraints and

ID	Theme	Comments/Issues Raised	Applicant's Response
			early understanding of the site context. At Stage 2, the location for the 400kV Project Substation was identified in Sub-Site 5A, with consideration of the High-Pressure Gas Main within the site, potential archaeological remains as indicated by the HER data and the geophysical survey, and consideration of landscape and visual impact. As set out in Paragraph 5.1.10 of the Design Approach Document [APP-212], the siting of the Project Substation in Sub-Site 5A has remained largely unchanged. As set out in paragraph 3.1.3 of the Grid Connection Statement [APP-207], the location of the 400 kV Project Substation within Sub-Site 5A is directly informed by the technical configuration of the Grid Connection Infrastructure. Circuits from Sites 3, 4, 5, 7, 8, 9 and 10 must connect to the Site 5 400 kV Project Substation. From there, the circuits will connect by 400 kV cable to the new National Grid Substation, where the Scheme will connect to the NETS. The central location of the 400kV Project Substation within Site 5 therefore provides an electrically efficient design. From a landscape and visual perspective, the Project Substation has been sensitively sited centrally within Site 5 maximising the screening benefits of existing vegetation and maximising the setbacks from a number of receptors including

ID	Theme	Comments/Issues Raised	Applicant's Response
			local PRoW, residential properties and heritage receptors. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A Green Infrastructure Strategy [AS-005] has been developed which includes a combination of new hedgerow with trees, tree planting and hedgerow improvements to respond to existing characteristic features and aid visual screening of the Scheme. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is in the Outline LEMP [APP-199] secured by Requirement in the Draft DCO [AS-032]. The location within Sub-Site 5A was considered to benefit from good accessibility for construction traffic and AILs from the A140 via the B1527. The Project Substation in Sub-Site 5A is located on subgrade 3b quality land and therefore does not comprise BMV, as set out at Paragraph 15.8.44 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The 400 kV Project Substations are subject to design parameters and commitments secured through the Design Principles, Parameters and Commitments [APP-213], including minimum offset distances from watercourses, badger setts, hedgerows, trees, Ancient Woodland, ponds, SSSIs, County

ID	Theme	Comments/Issues Raised	Applicant's Response
			Wildlife Sites, PRoW and residential curtilages, together with maximum compound areas and a maximum height of 13m to the top of the busbars. The Design Principles, Parameters and Commitments [APP-213] further states that, whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. The Applicant therefore considers that the site selection and design evolution of the 400 kV Project Substations, undertaken as part of the wider environmentally led design process in accordance with NPS EN-1, NPS EN-3 and NPS EN-5, provides a proportionate and criteria-led justification for the chosen locations which enables an electrically efficient design, and benefits from existing screening and accessibility from the SRN.
MFPC-PDA-003	Site Selection	The adequacy of the Applicant's site selection and alternatives assessment, including whether reasonable alternative locations for the 400 kV Project Substation have been properly identified, assessed	The Applicant refers to its response provided at MFPC-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and compared having regard to EN-1 and EN-5;	
MFPC-PDA-004	Landscape and Visual Cumulative and In-Combination Effects	The combined and cumulative landscape and visual effects of the 400 kV Project Substation, tracker panels and other infrastructure at Site 5, together with the effects of Site 7 and associated infrastructure, including how these elements would be experienced from surrounding roads, public rights of way, residential properties and heritage assets;	ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] presents an assessment of likely effects of the Scheme based on worst-case Scheme parameters and considers the effects of the Scheme as a whole rather than individual elements in isolation. The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and considers effects on visual receptors. Detailed receptor-specific assessments are provided within ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120], and ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]. A Residential Visual Amenity Assessment, which focusses on private views, is presented in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP- 149] has considered the visual amenity effects on PRoW. Potential impacts on heritage assets are provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].

ID	Theme	Comments/Issues Raised	Applicant's Response
			Although the landscape and visual receptors have been divided into individual Sites for the purposes of presenting the assessment clearly and avoiding duplication, the assessment does not consider each Site in isolation. The LVIA assesses the effects of the Scheme as a whole, including the combined influence of multiple Scheme elements where these are visible within the same view. Effects are assessed on a viewpoint-by-viewpoint basis, taking account of all visible components of the Scheme, including the 400 kV Project Substation, solar arrays, BESS and associated infrastructure, where relevant. In relation to Sites 5 and 7, it is acknowledged that receptors may experience views of more than one Site or infrastructure component. However, the assessment identified limited intervisibility between a number of the Sites due to separation distances, local topography, field boundary vegetation, woodland blocks and the contained nature of many views within the surrounding landscape.
MFPC-PDA-005	Soils and Agricultural Land	The justification for development affecting Grade 2 Best and Most Versatile agricultural land, having regard to the relevant provisions of EN-3, including the preference for poorer-quality agricultural land where agricultural land is necessary	The assessment set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], the Site Selection Assessment [APP-215], the Design Approach Document [APP-212] and the Planning Statement [APP-209] demonstrates compliance with the relevant provisions of NPS EN-3 (paragraphs 2.10.20 to 2.10.26 and

ID	Theme	Comments/Issues Raised	Applicant's Response
		and the expectation that BMV land should be avoided where possible;	2.10.137), including the preference for poorer-quality agricultural land where agricultural land is necessary and the expectation that BMV land should be avoided where possible. In respect of the 400 kV Project Substation at Sub-Site 5A specifically, that policy preference has been directly applied through the siting of the substation on subgrade 3b land. While avoidance of BMV is an important consideration in the siting of the 400kV Project Substations, this must also be balanced with other operational, landscape, and access considerations, as set out at Paragraph 15.8.43 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. It was considered necessary to locate the 400kV Project Substation in the BESS Site and Sub-Site 1B on Grade 2 land, given that Site 1 is all of Grade 2 quality. For technical reasons the substations need to be located close to the National Grid Substation, and avoidance of land of BMV quality is therefore not possible.
MFPC-PDA-006	Cultural Heritage	Impacts upon the setting and significance of Fritton Conservation Area and the Grade I listed Church of St Catherine, including the contribution made by their rural landscape setting and the combined effect of the substation, tracker	The Applicant refers to its response provided to Morningthorpe and Fritton Parish Council's relevant representation [RR-1373] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town

ID	Theme	Comments/Issues Raised	Applicant's Response
		panels and associated infrastructure upon that setting; and	Councils, and Parish Meetings [PDA-011] under comment ID MFPC-013 and MFPC-014.
MFPC-PDA-007	Water Environment	The potential effects of construction and operation upon groundwater, private water supplies and private sewage treatment systems, including whether the Applicant has adequately identified potentially affected receptors and assessed risks arising from construction, excavation, drainage, changes to groundwater conditions, pollution and other pathways;	The Applicant refers to its responses provided within The Applicant's Response to Relevant Representations Part 5: By Theme [PDA-012] comment IDs WAT-036 to WAT-046 and GRO-001 to GRO-002, GRO-004 to GRO-006 and GRO-013.
MFPC-PDA-008	Ecology and Biodiversity	Whether the ecological assessment adequately identifies and assesses effects upon protected, priority, rare or otherwise notable species and their habitats, including potential direct, indirect and cumulative effects arising from Site 5 and associated infrastructure; and	The Applicant refers to its response provided to Morningthorpe and Fritton Parish Council's relevant representation [RR-1373] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID MFPC-001.
MFPC-PDA-009	Cumulative and In-Combination Effects	Cumulative impacts upon the local community, including construction traffic and access, noise and disturbance, landscape and visual	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 –The Scheme [APP-040] , which includes all components of the Scheme, including

ID	Theme	Comments/Issues Raised	Applicant's Response
		effects, effects upon private water and drainage infrastructure, and the interaction between works associated with Sites 5 and 7.	the Scheme elements within both Site 5 and Site 7. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. The Applicant refers to its response on cumulative and in-combination effects under comments BEPS-034 in The Applicant's Response to Relevant Representations - Part 3 [PDA-010].
MFPC-PDA-010	Scheme Description	The Parish Council considers it particularly important that Site 5 is assessed as a whole and not simply by considering the substation or solar infrastructure in isolation. The Examination should consider the combined effect of the proposed 400 kV Project Substation, tracker panels and associated infrastructure upon the landscape, heritage assets, agricultural land, food security, adjacent households and nearby communities.	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 –The Scheme [APP-040] , which includes all components of the Scheme, including the Scheme elements within both Site 5 and Site 7. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation.
MFPC-PDA-011	Site Selection	The Council also considers it important that the Examination addresses whether the Applicant has properly applied the relevant siting principles and adequately justified the selection of Site 5 notwithstanding these effects.	The Applicant refers to its response provided at MFPC-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
MFPC-PDA-012	Site Selection	Issue Specific Hearing 1 – Site Selection The Rule 6 letter identifies ISH1 on 16 and 17 September 2026 as relating to site selection, the scope of the proposed development and the draft DCO. Site selection, the scope of the proposed development and the draft DCO. The Parish Council therefore requests that ISH1 includes appropriate consideration of: Whether the Applicant has adequately justified Site 5 as the location for the proposed 400 kV Project Substation and associated solar infrastructure, having regard to the relevant site-selection principles;	The Applicant notes that Site Selection in relation to the 400kV Project Substations was discussed at the Issue Specific Hearing (ISH). Please refer to the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [EN0110014/EXAM/9.17], specifically Action Point 19. In relation to the justification for Site 5 as the proposed location for the Project Substation, please further refer to the response provided in MFPC-PDA-002.
MFPC-PDA-013	Scheme Description	Whether the combined scale and effects of the substation, tracker panels of up to 4.5m and associated infrastructure at Site 5 have been properly taken into account in selecting the site;	As set out within the Design Approach Document [APP-212] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], the siting of the 400kV Project Substation in Sub-Site 5A has remained largely unchanged since it was selected at Stage 1. The site selection was informed by the Applicant's search criteria informed by the consideration of environmental, technical, and operational considerations in accordance with national policy set out in NPS EN-1 and EN-3. As explained in ES Volume 1, Chapter 2- Environmental Impact

ID	Theme	Comments/Issues Raised	Applicant's Response
			Assessment Methodology [APP-038], the Environmental Impact Assessment is based on the 'Rochdale Envelope' in accordance with guidance from the Planning Inspectorate to assess the worst case scenario. For each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained and has been assessed under the Rochdale Envelope approach.
MFPC-PDA-014	Assessment	Whether the landscape, heritage, agricultural land, impact on food security, individual residents and community consequences of that selection have been adequately assessed;	In relation to landscape, heritage, and agricultural land, please refer to the response provided at MFPC-PDA-002, 004 005, 006, 008. In relation to the community consequences of site selection, the Applicant refers to its response provided to Morningthorpe and Fritton Parish Council's relevant representation relevant representation [RR-1373] in The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment IDs MFPC-003 and MFPC-004.
MFPC-PDA-015	Site Selection	Whether reasonable alternative locations have been appropriately identified, assessed and compared having regard to EN-1 and EN-5; and	Please refer to the response provided at MFPC-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
MFPC-PDA-016	Cumulative and In-Combination Effects	Whether the cumulative effects of Site 5 together with Site 7 and other elements of the proposed development have been adequately considered as part of the site-selection exercise.	Please refer to the response provided at MFPC-PDA-004.
MFPC-PDA-017	Site Selection	In considering whether Site 5 has been adequately justified, the Parish Council requests that the Examining Authority considers whether the site-selection exercise has appropriately taken account of the site's environmental constraints and sensitive receptors, including private water supplies, private drainage and sewage treatment infrastructure, ecological receptors and protected or notable species, alongside landscape, heritage, agricultural land and food security considerations. The Parish Council requests to participate in ISH1 in relation to these matters.	Please refer to the response provided at MFPC-PDA-004 to MFPC-PDA-010.
MFPC-PDA-018	Concluding Remarks	Conclusion The Parish Council respectfully requests that:	The Applicant notes these requests and refers to its responses to Morningthorpe and Fritton Parish Council outlined above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		1. the Examination gives particular scrutiny to the selection and justification of Site 5 and the combined effects of the 400 kV Project Substation, tracker panels and associated infrastructure; 2. the selection of Site 5, the applicable EN-1/EN-5 siting considerations and assessment of reasonable alternatives are appropriately examined at ISH1; 3. the Parish Council is permitted to participate in ISH1 in relation to these matters. 2.1.1 The Parish Council will provide further detail on its substantive concerns through its Written Representation and subsequent examination submissions as appropriate.	

Table 3.3 Woodton Parish Council [\[PDA-039\]](#)

The Applicant has reproduced the images included within Woodton Parish Council's representation in this document for completeness. The Applicant notes that, as a result of reproducing and formatting the images within this response document, some loss of image quality and readability may have occurred. Readers wishing to view the images at their original resolution should refer directly to Woodton Parish Council's submission [\[PDA-039\]](#) on the Planning Inspectorate website.

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-001	Opening Remarks	<i>Applicant's Note:</i> Woodton Parish Council has provided an executive summary of its representation. This has not been reproduced in this table to avoid duplication.	The Applicant refers to its responses to comments WPC-PDA-002 to WPC-PDA-074.
WPC-PDA-002	Transport and Access	Site 7 Failure to Consider Springwood Lane, Woodton Access Arrangements The Applicant's Transport and Access assessment appears to have not fully considered the specific circumstances of Springwood Lane, Woodton, which functions as a cul-de-sac with highly limited access to the wider highway network.	The Applicant notes the concerns raised regarding Springwood Lane, Woodton. Springwood Lane does not form part of the construction traffic routing strategy for the Scheme and construction traffic is not proposed to utilise this route. However, it is recognised that Springwood Lane is connected to Shotesham Road. The assessment reported within ES Volume 1, Chapter 11 – Transport and Access [APP-047] therefore focused on routes identified for use by construction traffic associated with the Scheme. This includes Woodton Road and Shotesham Road, for which the transport effects have been assessed.

ID	Theme	Comments/Issues Raised	Applicant's Response						
			The effects associated with construction traffic on these routes are reported within ES Volume 1, Chapter 11 – Transport and Access [APP-047] and were assessed as temporary and negligible.						
WPC-PDA-003	Transport and Access	 The Outline Construction Traffic Management Plan identifies both Shotesham Road and Woodton Road as highway links which will have significant street works, closures and alterations completed over the project timeline¹: <table><tr><th>Type of Street Work</th><th>Road</th><th>Description</th></tr><tr><td></td><td></td><td></td></tr></table>	Type of Street Work	Road	Description				The Applicant notes the references to the street works identified within the Streets Plan [APP-010]. In relation to Woodton Road between reference points 7B and 7C, these reference points do not connect via the public highway. Vehicle movements between these locations would instead be facilitated via an internal haul route through Sites 7J and 7K. The provision of this internal haul route avoids the need for construction vehicles to travel via Fylands Road between Wash Lane and Woodton Road. The sections of Woodton Road between reference points 7C and 7D and between reference points 7E and 7F are identified for temporary suspension, restriction or traffic regulation measures where required to facilitate construction activities safely and practically. The permanent alterations identified at these locations relate to the provision of site access points within the Order Limits, designed to enable vehicles associated with the
Type of Street Work	Road	Description							

¹ East Pye Solar, 7.6 *Outline Construction Traffic Management Plan* – Revision 1, March 2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised			Applicant's Response
		Subject to works	Woodton Road	Between reference points 1A and 1B and shaded purple on sheet 1 of the street plans	Scheme to safely and efficiently access and egress the Site. Similarly, the temporary closure and associated traffic regulation measures proposed on Shotesham Road between reference points 6A and 6B would be implemented where required to facilitate construction activities safely and practically. The Applicant therefore considers that the measures identified within the Streets Plan [APP-010] represent temporary construction requirements and the provision of safe and practical access arrangements, rather than permanent changes to the function of the local highway network.
		Subject to works	Woodton Road	Between reference points 7C and 7D and shaded purple on sheet 7 of the streets plan	
		Subject to works	Woodton Road	Between reference points 7E and 7F and shaded	

ID	Theme	Comments/Issues Raised			Applicant's Response
				purple on sheet 7 of the streets plan	
		Subject to works	Shotesham Road	Between reference points 6A and 6B and shaded purple on sheet 6 of the streets plan	
		Permanent Alteration	Woodton Road	Permanent alteration of layout between reference points 7C and 7B and shaded purple on sheet 7 of	

ID	Theme	Comments/Issues Raised			Applicant's Response
				the streets plan	
		Permanent Alteration	Woodton Road	Permanent alteration of layout between reference points 7E and 7F and shaded purple on sheet 7 of the streets plan	
		Temporary Alteration	Shotesham Road	Temporary alteration of layout between reference points 6A and 6B and shaded purple of sheet 6 of	

ID	Theme	Comments/Issues Raised			Applicant's Response
				the sheets plan	
		Temporarily Closed	Woodton Road	Approximately 179m of Woodton Road between points 1A and 1B on sheet 1 of the streets plan	
		Temporarily Closed	Woodton Road	Approximately 101m of Woodton road between points 7C and 7D on sheet 6 and 7 of the streets plan	

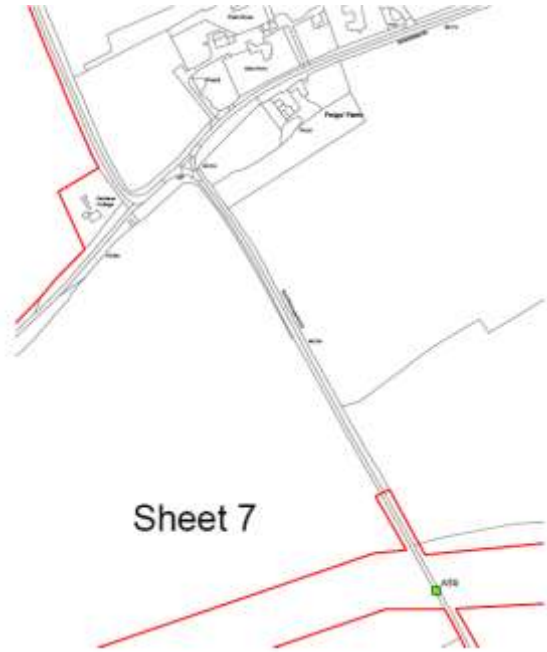
ID	Theme	Comments/Issues Raised			Applicant's Response
		Temporarily Closed	Woodton Road	Approximately 181m of Woodton road between points 7E and 7F on sheet 6 and 7 of the streets plan	
		Temporarily Closed	Shotesham	Approximately 258m of Shotesham Road between points 6A and 6B on sheet 6 of the streets plan	
WPC-PDA-004	Cable Route Corridor	Shotesham Road is proposed for street works and temporary closure in connection with Cable Route Corridor (CRC) trenching			The Applicant notes the references to the street works identified within the Streets Plan [APP-010] and the construction crossing identified within the

ID	Theme	Comments/Issues Raised	Applicant's Response
	Transport and Access	works, whilst Woodton Road is identified for street works, temporary closure and permanent alteration in connection with both CRC trenching works and the establishment of construction access points A53, A57 and A58.	Access and Public Rights of Way Plan [APP-011]. The construction crossing identified on Shotesham Road (A59) within the Access and Public Rights of Way Plan [APP-011] forms part of the Cable Route Corridor (CRC) and does not function as an internal haul route. The crossing is required to facilitate installation of the cable within the CRC, allowing vehicles and plant to move between Order Limits on either side of Shotesham Road. Once established, the crossing allows vehicles to move directly between these areas without requiring travel along the public highway. The temporary closure, suspension and traffic regulation measures identified on Shotesham Road relate to the construction of the crossing and the installation of the cable within the highway. These measures would be required only for the duration of these works and would be implemented only where necessary to facilitate the works safely and practically. Similarly, the permanent alterations identified on Woodton Road within the Streets Plan [APP-010] relate to the provision of construction access points A53, A57 and A58 within the Order Limits. These access arrangements are designed to enable vehicles associated with the Scheme to safely and practically access and egress the Site.

ID	Theme	Comments/Issues Raised	Applicant's Response
		 Additionally, the Access and Public Rights of Way Plan notes that there will be a permanent construction crossing on Shotesham Road.³	The Applicant therefore considers that the street works, traffic management measures and access arrangements identified within the Streets Plan [APP-010] and Access and Public Rights of Way Plan [APP-011] are required to facilitate the safe construction of the Scheme and do not represent permanent changes to the function of the local highway network.

² East Pye Solar, 7.6 Outline Construction Traffic Management Plan – Revision 1, March 2026: p. 43. [Reference by Woodton Parish Council].

³ East Pye Solar, 2.7 Access and Public Rights of Way Plan – Revision 1, March 2026: p. 8 [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		 Sheet 7	
WPC-PDA-005	Transport and Access	The Applicant does not appear to have assessed the cumulative effect of multiple interventions proposed on the local highway network serving Springwood Lane. The proposals include street works, temporary alterations, temporary closures and a construction crossing on Shotesham Road, together with additional works, alterations and closures on Woodton Road. While each intervention has been identified	The Applicant notes the concerns raised regarding potential community severance effects associated with the combined impact of works on the local highway network. Community severance has been assessed within ES Volume 1, Chapter 4 – The Scheme [APP-040]. The Applicant does not agree that the Scheme would result in significant severance effects for Springwood Lane residents.

ID	Theme	Comments/Issues Raised	Applicant's Response
		separately, the Environmental Statement does not appear to assess their combined effect on residents who depend on these roads for access to the wider highway network. The Applicant has therefore failed to demonstrate that community severance effects on Springwood Lane residents have been properly assessed. This omission is significant because Springwood Lane does not form part of a throughroute and residents rely on the surrounding local road network to gain access to employment, education, healthcare, emergency services and other daily activities.	Construction traffic would be managed through measures contained within the Outline CTMP [APP-201], including vehicle booking systems, designated routing arrangements and temporary passing places where required. These measures are intended to ensure that construction traffic is managed efficiently and to minimise the potential for vehicle conflicts on constrained sections of the local highway network. In addition, Figure 2.1 of the Outline CTMP [APP-201] illustrates that construction activities associated with vehicles using this specific part of the local road do not all occur simultaneously. For example, construction activities associated with Sites 8A and 8B are programmed at different times to activities associated with Sites 7G to 7K. Likewise, the construction activities associated with Sites 7G to 7L are not all undertaken concurrently. There are only limited periods within the construction programme where works associated with multiple sites utilising the same access routes overlap. The Applicant therefore considers that the effects of the temporary construction works have been appropriately assessed and that the proposed management and mitigation measures would minimise the potential for temporary disruption to local road users and residents.

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-006	Transport and Access	No evidence has been identified demonstrating that: - the Applicant has assessed whether residents of Springwood Lane would retain a practicable vehicular route at all times; - the cumulative effects of simultaneous restrictions on Woodton Road and Shotesham Road have been modelled; - emergency access and egress have been evaluated for properties within Springwood Lane; - alternative diversion routes available to residents have been identified and demonstrated to be realistic; or - the community severance effects arising from this specific location have been assessed.	The Applicant notes the concerns raised regarding access, cumulative effects and community severance. Access to properties served by Springwood Lane would be maintained throughout the construction period. The Outline CTMP [APP-201] includes a range of traffic management and mitigation measures intended to manage interactions between construction traffic and local highway users, including vehicle booking systems, designated routing arrangements and temporary passing places where required. As noted in the Applicant's response to Query WPC-PDA-002, Springwood Lane does not form part of the construction traffic routing strategy for the Scheme and construction traffic is not proposed to utilise this route. However, the Applicant acknowledges that Springwood Lane connects to Woodton Road and Shotesham Road, which are used by construction traffic and have therefore been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. With regard to cumulative effects, the Applicant notes that this representation appears to refer to the combined effects of multiple construction activities occurring simultaneously. As set out in Figure 2.1 of the Outline CTMP [APP-201], construction activities associated with the various parts of the Scheme are phased throughout the

ID	Theme	Comments/Issues Raised	Applicant's Response
			construction programme and do not all occur concurrently. For further information, see the Applicant's response to WPC-PDA-005. The overlap between activities utilising the same local highway routes is limited and construction traffic would be managed through the measures set out within the Outline CTMP [APP-201]. Where temporary restrictions or closures are required to facilitate specific works, appropriate traffic management measures and signed diversion routes would be implemented as necessary. Residents would therefore continue to have access to the wider highway network throughout the construction period. Community severance has been assessed within the Environmental Statement. In relation to the local roads identified within this representation, the effects associated with construction traffic on Woodton Road and Shotesham Road are reported within ES Volume 1, Chapter 11 – Transport and Access [APP-047], which concluded that effects would be temporary and negligible.
WPC-PDA-007	Transport and Access	The concern is amplified by the Applicant's proposals relating to the use of Shotesham Road and Woodton Road as construction access corridors. The Construction Traffic Management Plan identifies construction access point A53 on Woodton Road and	The Applicant acknowledges the concerns raised regarding the use of Woodton Road and Shotesham Road for both construction traffic and construction works. The Applicant does not agree that the proposed works would substantially reduce or prevent

ID	Theme	Comments/Issues Raised	Applicant's Response
		construction crossing point A59 on Shotesham Road as part of the proposed construction access arrangements for the Cable Route Corridor. Consequently, the two roads which residents rely upon for access are also proposed to serve construction traffic and construction works. This creates the possibility that restrictions introduced to facilitate construction activity could substantially reduce or prevent normal residential movements.	normal residential movements. Access for local residents would be maintained throughout the construction period, with the Outline CTMP [APP-201] setting out the framework for managing construction traffic and local highway users safely and efficiently. For further information regarding the proposed traffic management measures, construction programme and access arrangements, please refer to the Applicant's response to WPC-PDA-006.
WPC-PDA-008	Transport and Access	The Environmental Statement: Transport and Access (T&A) chapter states that the assessment should consider matters such as community severance and disruption to local access. The chapter specifically identifies temporary effects arising from construction traffic, road closures and restrictions as matters requiring assessment. The study area expressly includes "Shotesham Road / Woodton Road / Baxter's Lane" as a transport corridor requiring assessment.⁴ However, no location-specific assessment has been identified regarding how residential access	The Applicant notes the concerns raised regarding the assessment of access and community severance. The Applicant agrees that Shotesham Road, Woodton Road and Baxter's Lane form part of the study area and have therefore been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. These roads were included within the assessment as they form part of the construction traffic routing strategy for the Scheme. Springwood Lane does not form part of the construction traffic routing strategy and construction traffic is not proposed to utilise this route.

⁴ East Pye Solar, 6.1.11 Environmental Statement Volume 1: Chapter 11 – Transport and Access – Revision 1, March 2026, p. 13. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		would be maintained for Springwood Lane residents if the proposed restrictions on this corridor occur simultaneously, in close succession or in a manner that removes the only practical route to the wider road network.	The Applicant does not agree that residential access has not been considered. Access to properties would be maintained throughout the construction period and construction traffic would be managed in accordance with the Outline CTMP [APP-201], including measures such as delivery scheduling, designated routing arrangements and temporary passing places where required. With regard to the potential for simultaneous restrictions on the local highway network, the Applicant refers to its response to WPC-PDA-005. Figure 2.1 of the Outline CTMP [APP-201] demonstrates that construction activities across the Scheme are phased throughout the construction programme and do not all occur concurrently. As such, the overlap between activities utilising the same local highway routes is limited. The Applicant therefore considers that community severance effects have been appropriately assessed and that the proposed traffic management and mitigation measures would minimise the potential for temporary disruption to local residents.
WPC-PDA-009	Transport and Access	The Examining Authority is requested to seek clarification from the Applicant on the following matters: Whether the Applicant has assessed the consequences of	The Applicant notes the matters raised for clarification. <u>1 and 2</u> The Applicant does not agree that residents of Springwood Lane would experience a loss of

ID	Theme	Comments/Issues Raised	Applicant's Response
		overlapping closures or restrictions on Woodton Road and Shotesham Road for residents of Springwood Lane. 2. How continuous (24/7) vehicular access for residents will be guaranteed throughout the construction period. 3. How emergency vehicle access and egress will be maintained under all construction scenarios. 4. Whether a specific access strategy for Springwood Lane will be secured through the final CTMP. 5. Whether the Applicant accepts that community severance effects for Springwood Lane have not been fully assessed within the submitted Environmental Statement.	access to the wider highway network as a result of the Scheme. Access to properties would be maintained throughout the construction period, with construction traffic and construction activities managed in accordance with the Outline CTMP [APP-201]. As set out in the Applicant's response to WPC-PDA-005, construction activities across the Scheme are phased throughout the construction programme and do not all occur concurrently. In addition, measures including delivery scheduling, designated routing arrangements and other traffic management measures would be implemented to manage the interaction between construction traffic and existing highway users. <u>3</u> Emergency access and egress would continue to be maintained throughout the construction period and residents would not be prevented from accessing or leaving their properties as a result of the Scheme. <u>4</u> Springwood Lane itself does not form part of the construction traffic routing strategy and construction traffic is not proposed to utilise this route. <u>5</u>

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges that residents of Springwood Lane access the wider highway network via Woodton Road and Shotesham Road. Accordingly, the effects associated with construction traffic on these links have been assessed within ES Volume 1. Chapter 11 – Transport and Access [APP-047]. The Applicant therefore agrees that community severance effects on Springwood Lane itself have not been assessed, as no construction traffic is proposed to route via this road. However, the Applicant does not agree that community severance effects relevant to Springwood Lane residents have not been assessed. Community severance has been assessed within the Environmental Statement, including in relation to Woodton Road and Shotesham Road, which provide access between Springwood Lane and the wider highway network. The effects associated with construction traffic on these routes were assessed as temporary and negligible.
WPC-PDA-010	Transport and Access	The documentation currently before the Examination identifies both Woodton Road and Shotesham Road as roads that may be temporarily closed and simultaneously proposes construction access arrangements on those same roads. Yet no evidence has been provided that the consequences for residents of Springwood	The Applicant does not agree that reasonable residential access has not been demonstrated. Whilst the Streets Plan [APP-010] identifies locations on Woodton Road and Shotesham Road which may be subject to temporary restrictions, traffic management measures or temporary closures during specific construction activities, these would not occur concurrently in a manner

ID	Theme	Comments/Issues Raised	Applicant's Response
		Lane, a cul-desac dependent upon this local network, have been specifically assessed. As a result, the Applicant has not demonstrated that reasonable residential access can be maintained throughout construction, nor that the potential severance effects on this community have been properly evaluated. This matter is directly relevant to the ExA's principal issues concerning: Traffic and Transport; Community, health and well being; and Cumulative effects.⁵	that would prevent residents from accessing the wider highway network. Access to properties would be maintained throughout the construction period. Where temporary restrictions or closures are required to facilitate specific works, appropriate traffic management measures and, where necessary, signed diversion routes would be implemented. As outlined in the Applicant's response to WPC-PDA-005, construction activities across the Scheme are phased throughout the construction programme and do not all occur concurrently. The Applicant therefore does not agree that the Scheme would result in residents of Springwood Lane being severed from the wider highway network. The Applicant acknowledges that residents of Springwood Lane access the wider highway network via Woodton Road and Shotesham Road. The effects associated with construction traffic on these links have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. The Applicant therefore does not agree that the potential effects relevant to Springwood Lane residents have not been assessed.

⁵ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsp-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsp-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19-20. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-011	Transport and Access	Failure to Assess Physical Suitability of Woodton Road and Shotesham Road for Construction HGVs This representation is distinct from the Applicant's analysis of construction traffic volumes and routing noted in the T&A document. The concern is not the number of HGVs predicted to use the local highway network, but whether Woodton Road and Shotesham Road are physically capable of accommodating the size and frequency of construction vehicles proposed by the scheme.	The Applicant acknowledges that the physical suitability of Woodton Road and Shotesham Road for construction traffic is an important consideration. The suitability of these routes has been assessed through vehicle tracking undertaken as part of the transport assessment process. The results of these assessments informed the identification of Woodton Road and Shotesham Road as suitable construction traffic routes. The Applicant notes that additional vehicle tracking assessments, submitted at Deadline one, have also been undertaken to supplement the construction traffic routing strategy and confirm the suitability of the proposed vehicle types on specific routes. The Applicant also acknowledges that certain sections of the local highway network are constrained and that the geometry of some junctions requires careful consideration. In recognition of these constraints, Paragraph 7.6 of the Outline CTMP [APP-201] states that HGVs serving Sites 7G-H, 8A-B and 9 would be restricted to either a 10m rigid vehicle or a 12m drawbar vehicle, as opposed to a 16.5m articulated vehicle. This measure is intended to ensure vehicle manoeuvrability on Woodton Road and Shotesham Road. Where necessary, materials and equipment

ID	Theme	Comments/Issues Raised	Applicant's Response
			may be transhipped at the temporary construction compound at Sub-Site 10C. Vehicle tracking drawings contained within Appendix C of ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177] demonstrate that 10m rigid vehicles and 12m drawbar vehicles can safely enter and exit the relevant construction access points from Woodton Road and Shotesham Road and undertake the manoeuvres required to access the Site. The Applicant therefore does not agree that the physical suitability of Woodton Road and Shotesham Road for construction HGVs has not been assessed. The assessment has informed both the proposed routing strategy and the vehicle size restrictions identified within the Outline CTMP [APP-201].
WPC-PDA-012	Transport and Access	Woodton Road and Shotesham Road are both single carriageways with limited opportunities for passing places:	The Applicant acknowledges that Woodton Road and Shotesham Road are rural roads and that certain sections of these routes are constrained. The Applicant does not agree that these characteristics have not been considered. The suitability of Woodton Road and Shotesham Road for construction traffic has been assessed through the transport assessment process and informed both the proposed routing strategy and the mitigation measures included within the Outline CTMP [APP-201].

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant also notes that the management of construction traffic would not rely on vehicles using highway verges as informal passing places. The Outline CTMP [APP-201] includes measures such as delivery scheduling, designated routing arrangements and temporary passing places where required. These measures are intended to minimise the potential for vehicle conflicts on constrained sections of the local highway network. The Applicant therefore does not agree that the physical and operational characteristics of Woodton Road and Shotesham Road have not been taken into account in the development of the construction traffic strategy for the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		There are also multiple instances of both roads having very low hanging tree canopies: 	

ID	Theme	Comments/Issues Raised	Applicant's Response
		 The Applicant does not appear to have assessed several important physical constraints affecting these roads. In particular:	

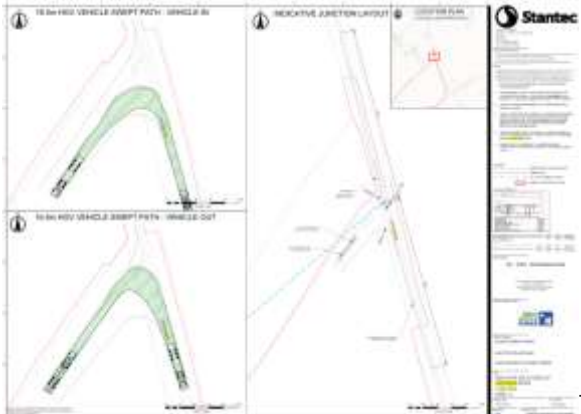
ID	Theme	Comments/Issues Raised	Applicant's Response
		• Woodton Road and Shotesham Road are rural single-carriageway roads with limited opportunities for vehicles to pass; • Verges cannot safely be relied upon as informal passing areas due to the presence of hidden drainage ditches which are not always readily apparent to drivers unfamiliar with the area; • Certain sections are subject to weight restrictions; • There are locations where the available carriageway width appears insufficient for two cars and an HGV to manoeuvre safely without one vehicle reversing or leaving the carriageway; and • The roads serve residential properties, farms and local traffic and are not purpose-built freight routes. These characteristics affect the practical operation of the road network regardless of the number of vehicles predicted by the Applicant.	

ID	Theme	Comments/Issues Raised				Applicant's Response
WPC-PDA-013	Transport and Access	The Environmental Statement assesses traffic effects using traffic modelling and movement forecasts. In response to consultation comments, they have responded that Woodton Road had been investigated:				The Applicant acknowledges that the swept path drawing referenced within the query demonstrates the manoeuvres required for vehicles entering and exiting a proposed construction access. The purpose of this assessment is to inform the design of the proposed access, demonstrating that the access is of an appropriate size for the vehicles expected to use it and that those vehicles can safely enter and leave the Site from the public highway. It is not intended to represent the full extent of the transport assessment undertaken for the Scheme. The suitability of Woodton Road and Shotesham Road for construction traffic has informed the development of the construction traffic routing strategy and associated mitigation measures. The Applicant notes that additional vehicle tracking assessments, submitted at Deadline one, have also been undertaken to supplement the construction traffic routing strategy and confirm the suitability of the proposed vehicle types on specific routes. The Applicant also acknowledges that certain sections of the local highway network are constrained and that the geometry of some junctions requires careful consideration. In recognition of these constraints, Paragraph 7.6 of the Outline CTMP [APP-201] states that HGVs serving Sites 7G-H, 8A-B and 9 would be restricted
		EPS3_LF_247	Respondent commented that the route from B1132 through Littlebeck Lane, Woodton Road and Heath Road contains small, single-track lanes, bends, a dangerous	No	The ES has considered HGV routeing and access arrangements to the Scheme and includes swept-path analysis and access design alongside suitable management and mitigation measures, shown in ES	

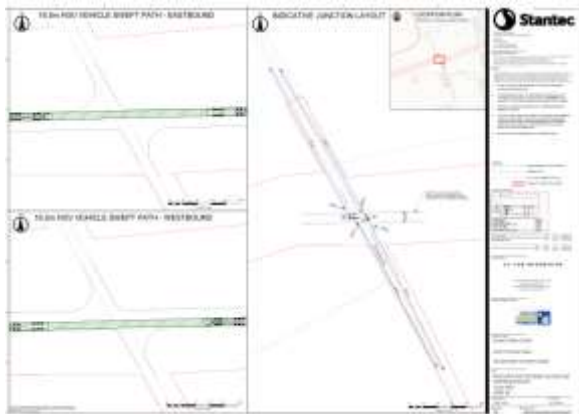
ID	Theme	Comments/Issues Raised				Applicant's Response
			s Z bend and a junction.		Volume 3, Appendix 11.1 – Transport Assessment [EN011001 4/APP/6.3.1 1.1]. Management measures are indicated in the OCTMP [EN011001 4/APP/7.6] and include delivery scheduling and monitoring to co-ordinate vehicle movements, waiting points for inbound	to either a 10m rigid vehicle or a 12m drawbar vehicle. This measure is intended to improve vehicle manoeuvrability and reduce impacts on the local road network. Where necessary, materials and equipment may be transhipped at the temporary construction compound at Sub-Site 10C. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201], including measures such as delivery scheduling, designated routing arrangements and temporary passing places where required. These measures have been developed to manage vehicle movements on constrained sections of the local highway network and minimise the potential for vehicle conflicts. The Applicant therefore does not agree that the physical suitability of Woodton Road and Shotesham Road for construction traffic has not been assessed. Rather, the assessment has informed both the proposed routing strategy and the vehicle size restrictions identified within the Outline CTMP [APP-201].

ID	Theme	Comments/Issues Raised				Applicant's Response
					construction vehicles, and the use of passing places on the LRN. These measures will minimise potential for vehicle conflict, particularly along narrow single-track lanes. 6 However, there is very limited evidence demonstrating that the Applicant has undertaken a full assessment of whether Woodton Road and Shotesham Road are physically suitable for the construction vehicles proposed. A swept path analysis only appears to exist where they are modelling HGV's entering newly created	

⁶ East Pye Solar, 5.11 Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026: p. 536. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		construction entrances on a straight piece of Woodton Road, using land they aim to acquire rights to and permanently alter:  • This swept path analysis does not account for the hidden ditches on the verges; • This swept path analysis does not account for other vehicles on the road; and • This swept path analysis shows that an HGV would occupy a substantial portion of the road.	

⁷ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 2, April 2026: p. 10. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-014	Transport and Access	A swept path analysis only exists on Shotesham Road for where they want to place a construction crossing:  In particular, the documents do not appear to demonstrate: • swept path analysis for critical sections of Woodton Road and Shotesham Road where the road is not straight; • assessment of vehicle passing opportunities; • assessment of conflict between HGVs and existing residential traffic;	The Applicant notes the comments regarding the purpose and extent of the swept path analysis presented within ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]. The Applicant refers to its response to WPC-PDA-013. As set out therein, the purpose of the swept path assessments is to inform the design of the proposed construction accesses. They are not intended to demonstrate vehicle movements along the entirety of Woodton Road and Shotesham Road. The Applicant also refers to its response to WPC-PDA-013 regarding the vehicle size restrictions and construction traffic management measures proposed for constrained sections of the local highway network. The Applicant therefore does not agree that the matters identified within the representation have not been considered as part of the development of the construction traffic strategy for the Scheme.

⁸ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 2, April 2026: p. 24. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		• assessment of carriageway edge stability adjacent to drainage ditches; • assessment of low tree canopies and overhanging vegetation; • assessment of how vehicles would pass where the carriageway narrows; or • assessment of the implications of vehicles reversing along sections of road when encountering oncoming traffic.	
WPC-PDA-015	Transport and Access	The two blind bends immediately outside Springwood Lane should have prioritised scrutiny:  A swept path analysis that only demonstrates how an HGV can turn into a construction access from a straight section of road (and where they gain acquisition rights to private land) does not necessarily	The Applicant refers to its response to WPC-PDA-013. The Applicant acknowledges that the swept path analysis presented within ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177] is focused on the proposed construction accesses. The purpose of these assessments is to inform the access design and demonstrate that the vehicle types expected to use the accesses can safely enter and leave the Site from the public highway. The suitability of Woodton Road and Shotesham Road for construction traffic has informed the development of the construction traffic strategy and associated mitigation measures. In recognition of constraints on sections of the local highway

ID	Theme	Comments/Issues Raised	Applicant's Response
		demonstrate that the same vehicle can safely reach that access in the first place. The two questions are different. The Applicant may have shown that a vehicle can physically enter a field access once it reaches it, but may not have demonstrated that the same vehicle can navigate constrained bends on Woodton Road without: • overrunning verges; • entering opposing carriageway space; • damaging highway edges; or • encroaching onto adjacent land. If a vehicle cannot negotiate the bends without leaving the highway, the route may not be practically suitable for the proposed vehicle movements. Large articulated vehicles often require substantially more road width when negotiating bends than when travelling on straight sections. If the bends on Woodton Road are narrow and constrained by ditches, there is a potential risk of: • conflict with oncoming vehicles; • conflict with cyclists, horse riders or pedestrians;	network, Paragraph 7.6 of the Outline CTMP [APP-201] states that HGVs serving Sites 7G-H, 8A-B and 9 would be restricted to either a 10m rigid vehicle or a 12m drawbar vehicle. This measure was developed in response to the constraints identified on the local highway network and is intended to improve vehicle manoeuvrability and reduce impacts on the local road network. The Applicant therefore does not agree that the matters identified within the representation have not been considered as part of the development of the construction traffic strategy for the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		- vehicles mounting verges to pass; - increased road edge deterioration; and - reduced safety margins. These matters are particularly relevant on rural roads where recovery space is limited.	
WPC-PDA-016	Transport and Access	Additionally, it should be noted that in a meeting with Norfolk County Council on 24th February 2026, it is stated in the minutes that Stantec: - MD/TH agreed to avoid formalising passing places at field and property accesses. MD noted using existing informal locations where possible was favourable. - Also agreed to seek to avoid areas with poor visibility, bends, ditches, etc. Temporary management measures (e.g. signage, speed reduction) may also be used.	The Applicant acknowledges the comments referenced from discussions with Norfolk County Council regarding the use of passing places and the need to take account of local constraints, including visibility, bends and drainage features. The Applicant agrees that such matters should be taken into consideration when developing the construction traffic strategy and associated mitigation measures. The proposed construction traffic routing strategy and the measures contained within the Outline CTMP [APP-201] have been developed having regard to the characteristics of the local highway network and through ongoing engagement with Norfolk County Council. The Applicant therefore agrees that the characteristics of Woodton Road and Shotesham Road are important considerations and considers that these have been taken into account in the development of the construction traffic strategy and associated mitigation measures.

ID	Theme	Comments/Issues Raised	Applicant's Response
		East Pye should be held to this agreement when assessing Woodton Road and Shotesham road for physical viability. ⁹	
WPC-PDA-017	Transport and Access	This issue is also directly connected to community severance. If vehicles are unable to pass one another safely, residents may experience delays, difficulty accessing their properties and restrictions on ordinary movements even when no formal road closure is in place. Consequently, the practical accessibility of the area may be reduced not simply by temporary closures but by the operational consequences of introducing construction HGVs onto roads that may be physically constrained. Although there is some reference to fear and intimidation as “moderate” for Shotesham Road in the T&A, this same analysis does not seem to have been done for Woodton Road.¹⁰ The Environmental Statement identifies community severance as a matter requiring assessment; however, no evidence has been identified that the Applicant has	The Applicant does not agree that community severance has not been assessed. Community severance was assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] in accordance with the IEMA Guidelines for Environmental Assessment of Traffic and Movement. As set out within the assessment, severance is defined as the “perceived division that can occur within a community when it becomes separated by a major traffic artery”. The assessment of severance was undertaken using the recognised IEMA methodology and considered forecast changes in traffic associated with the Scheme relative to baseline traffic conditions. The Applicant considers this to be an appropriate assessment approach and notes that it inherently takes account of existing traffic conditions on the local highway network. The Applicant therefore does not agree that community severance arising from the physical characteristics of the local highway network has

⁹ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 4, April 2026: p. 18. [Reference by Woodton Parish Council].

¹⁰ East Pye Solar, 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 – Transport Assessment (Revision 1) – Part 4, April 2026: p. 45. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		assessed the severance consequences arising from the physical limitations of the local road network itself.	not been considered. Community severance has been assessed using the recognised IEMA methodology adopted within ES Volume 1, Chapter 11 – Transport and Access [APP-047] , and appropriate management and mitigation measures have been identified for construction traffic on constrained sections of the local highway network.
WPC-PDA-018	Transport and Access	The Examining Authority is requested to ask the Applicant: 1. What assessment has been undertaken of the physical suitability of Woodton Road and Shotesham Road for the proposed construction vehicles? 2. Has swept-path modelling been completed for the likely most constrained parts of Woodton and Shotesham as is best practice? 3. Has the Applicant assessed locations where passing opportunities are limited? 4. How will HGVs safely negotiate sections with drainage ditches adjacent to the carriageway? 5. Have height restrictions arising from mature roadside trees been assessed?	The Applicant notes the matters raised for clarification. The issues identified within this representation have been addressed within the Applicant's responses to WPC-PDA-002 to WPC-PDA-018, including matters relating to construction traffic routing, vehicle tracking, constrained sections of the local highway network, passing opportunities, vehicle size restrictions, community severance, access arrangements and construction traffic management measures.

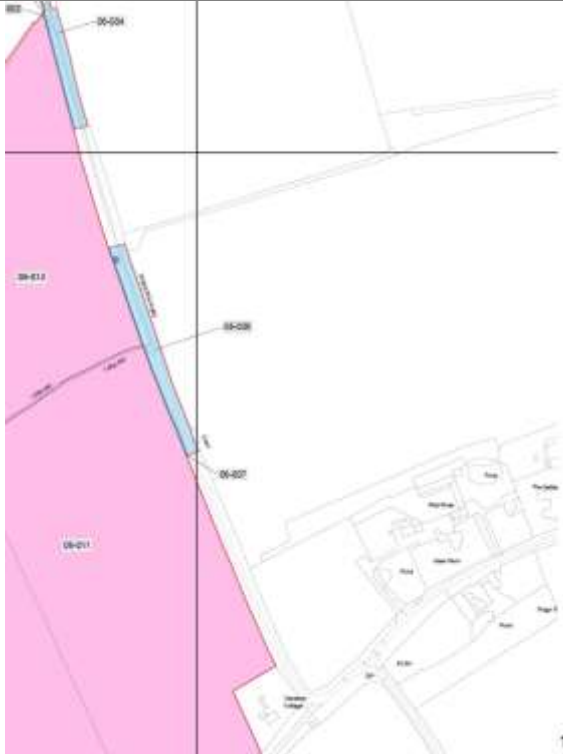
ID	Theme	Comments/Issues Raised	Applicant's Response
		6. How will residents access their properties if HGVs and local traffic are unable to pass safely? 7. How has the potential for driver conflict, reversing manoeuvres and obstruction of the carriageway been considered within the assessment of community severance?	
WPC-PDA-019	Transport and Access	The Applicant has assessed how many HGVs may use the local road network. They have access traffic demand but have not demonstrated highway suitability. The Applicant has not demonstrated that Woodton Road and Shotesham Road are physically suitable for those vehicles. This represents a separate issue from traffic generation and routing or a swept path analysis on a straight piece of Woodton Road. Until such an assessment is provided, the Examining Authority cannot be satisfied that the effects on access, highway safety and community severance have been fully assessed. This matter is directly relevant to the ExA's principal issues concerning: Traffic and	The Applicant notes the concerns raised regarding the physical suitability of Woodton Road and Shotesham Road for construction traffic. The matters raised within this representation have been addressed within the Applicant's responses to WPC-PDA-002 to WPC-PDA-018, including the suitability of Woodton Road and Shotesham Road for construction traffic, vehicle tracking assessments, vehicle size restrictions, construction traffic management measures, community severance and access arrangements. The Applicant also notes that additional vehicle tracking assessments, submitted at Deadline 1 (as Appendix A to this document), have been undertaken to inform the construction traffic routing strategy and confirm the suitability of the proposed vehicle types on Woodton Road and Shotesham Road.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Transport; and Site selection, alternatives and design. ¹¹	
WPC-PDA-020	Soils and Agricultural Land	Potential Effects on an Existing Family Agricultural Business The application proposes works affecting land whose landowner lives at Oaks Farmhouse (also known as Oaks Farm), Springwood Lane (06-006) via acquisition rights in the Book of Reference.¹²	The Applicant notes that the representation raises matters relating to access and highway impacts associated with Oaks Farm. Transport-related matters arising from these issues are addressed within the Applicant's response to WPC-PDA-021. The Applicant can confirm that plot number 06-006 as set out in the Land Plan [APP-006] page 8 (sheet 6), is adjoining the public highway and therefore the Respondent may hold interests in the subsoil beneath the highway. These interests relate solely to subsoil rights and do not affect the ownership or occupation of the adjoining land.
WPC-PDA-021	Transport and Access Soils and Agricultural Land	The Land Plans and Streets Plan indicate that the proposed highway alterations extend to the existing field boundary, associated hedgerow and farm vehicle access point. An X is placed in the below image to show farm vehicle access point into the agricultural and animal rearing land:	The Applicant notes the concerns raised regarding the existing agricultural access serving Oaks Farm. The proposed highway works and access arrangements have been developed having regard to existing land uses and accesses adjacent to the highway network. The Applicant does not propose to permanently prevent access to adjacent land or properties as a result of the Scheme. Where construction activities require temporary restrictions or traffic management measures, these

¹¹ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nspidocuments.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nspidocuments.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 20. [Reference by Woodton Parish Council].

¹² East Pye Solar, 4.3 Book of Reference – Revision 1, March 2026: p. 165. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			would be managed in accordance with the Outline CTMP [APP-201], and access would be maintained where reasonably practicable. The Applicant notes that the plans referenced within the representation identify the extent of the works and land required for the Scheme. The presence of works adjacent to an existing agricultural access does not in itself indicate that access to the land would be removed or prevented.

ID	Theme	Comments/Issues Raised	Applicant's Response
		 13 13	

¹³ East Pye Solar, 2.2 Land Plan – Revision 1, March 2026: p. 8 [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			
WPC-PDA-022	Soils and Agricultural Land	Even if the permanent land take is relatively small, the practical consequences may extend beyond the land directly acquired. For example, construction activity adjacent to the field boundary may reduce the usability of adjoining land, affect grazing	Effects on farm businesses are assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. In terms of the effects on farm businesses from the cable route construction, there may be short-term disruptions which will be subject to compensation. There is the option for grassland within the Scheme to be managed by the grazing of sheep, as set out within Paragraphs 4.5.27 to

¹⁴ East Pye Solar, 2.6 Streets Plan – Revision 1, March 2026: p. 8. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		arrangements, require stock to be moved, require additional fencing and complicate routine agricultural operations. These impacts have the potential to affect both sheep husbandry and hay production, resulting in economic consequences for the farming business. No evidence has been identified demonstrating that these matters have been assessed within the Environmental Statement.	4.5.28 of ES Volume 1, Chapter 4 – The Scheme [APP-040]. The Outline LEMP [APP-199] includes details of the modified grassland located beneath the panels included within the Scheme (amongst others) and the management approach for these, which includes the option of grazing by sheep, once established, in accordance with Requirement 7 of the Draft DCO [AS-032], under which a detailed Landscape and Ecology Management Plan will be submitted to and approved by the relevant planning authority. Effects on agricultural businesses are identified in ES Volume 3, Appendix 15.2 -Farm Reports [APP-183].
WPC-PDA-023	Soils and Agricultural Land	The Examining Authority is requested to ask the Applicant: 1. What assessment has been undertaken of the effects of the proposed works on the agricultural activities carried out on land adjoining the proposed highway alterations? 2. What land will be temporarily unavailable during construction? 3. How will livestock security be maintained if existing boundaries are altered?	Effects on farm businesses are assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. In terms of the effects on farm businesses from the cable route construction, there may be short-term disruptions which will be subject to compensation. In respect of the specific questions: <u>1</u> Agricultural land within the Order Limits has been assessed, including highway alterations, and the

ID	Theme	Comments/Issues Raised	Applicant's Response
		4. What replacement fencing and stock-proof boundaries will be provided? 5. Has the Applicant assessed the effect on hay production and grazing capacity? 6. Has any assessment been undertaken of the financial impact on the affected farming business? This matter is directly relevant to the ExA's principal issues concerning: Soils and agricultural land.¹⁵	effects are reported in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. <u>2</u> Land temporarily unavailable for farming during construction will be mostly confined to the cable route construction corridor, which will be a short-term temporary effect. <u>3</u> If existing stock proof boundaries are altered during construction, temporary stock proof fencing will be provided. All adjacent stock proof areas will remain stock proof through the construction phase. <u>4</u> Replacement fencing and/or hedges will be provided towards the end of the construction phase, to replace any boundaries temporarily affected (e.g. new stock proof fence and new hedge planting to replace any removed for construction). <u>5</u> The effects on hay production and grazing across the Site are considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Farm reports are available in ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]. This includes an assessment of agricultural production,

¹⁵ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 20. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			including livestock production, taking a long-term view due to the proposed duration of the solar farm. <u>6</u> Each of the affected farm businesses is summarised in Table 15.8 of the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The potential effects are assessed in Table 15.15 in this chapter.
WPC-PDA-024	Cultural Heritage	Impact on Oaks Farmhouse Has Not Been Adequately Demonstrated The Applicant identifies Oaks Farmhouse as a Grade II Listed Building* (Listing Number: 1170906) located approximately 180 metres east of Sub-Site 7L and 7K. As a Grade II* asset, Oaks Farmhouse is one of the most important, designated heritage assets within the study area and should be afforded considerable weight in decision-making.	The Applicant notes the concerns raised regarding the Grade II* Listed Oaks Farmhouse, the setting of which is provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. Solar PV panels have been set back from the east end of Sub-Site 7L and 7K, with enhanced landscape mitigation to add to the mature vegetation screening already present.

ID	Theme	Comments/Issues Raised	Applicant's Response
			
WPC-PDA-025	Cultural Heritage	The Cultural Heritage assessment confirms that designated heritage assets were assessed for impacts to their significance arising from changes to their setting. The assessment states that Grade II* Listed Buildings were subject to an extended study area due to their high sensitivity. Despite Oaks Farmhouse being specifically identified within the heritage baseline¹⁶, it is not apparent from the material reviewed that a detailed assessment has been undertaken of: the contribution made by the surrounding agricultural landscape to the significance of Oaks Farmhouse;	An assessment of the Grade II* Listed Oaks Farmhouse and its setting, together with impacts from the Scheme are provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. The assessment does acknowledge that the agricultural hinterland forms part of the wider historic setting of the heritage asset, and that there is a tenorial link between the Oaks Farmhouse and much of the surrounding land, including Sub-Sites 7K and 7L, which dates to the early-mid 19th century; however, it is not considered that historic ownership alone makes any specific contribution to its significance has a listed farmhouse, and it is

¹⁶ East Pye Solar, 6.1.10 Environmental Statement Volume 1: Chapter 10 – Cultural Heritage – Revision 1, March 2026: p. 28. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		- the effect of Sites 7K and 7L on its rural setting; - how views from Oaks Farmhouse towards the surrounding agricultural land would change; - the cumulative impact of both Sites 7K and 7L when experienced from the property; or - the effect of construction activity associated with the adjacent sites.	further noted that these lands are no longer form part of the holdings of Oaks Farmhouse. Oaks Farmhouse is currently set within a small plot which is enclosed by the property's gardens, which are bounded by mature hedgerows and trees to afford the complex a degree of privacy as a residence. A small field or paddock and a lane separates Oaks Farmhouse and Sub Site 7K and 7L, with their eastern boundaries formed of mature vegetation, though there are some gaps in this hedgerow which provided intervisibility between the heritage asset and the south-eastern corner of Sub Site 7L. As part of the development of the Scheme, a setback has been established along the eastern boundary of Sub-Sites 7K and 7L, with this setback resulting in the removal of much of this intervisibility. Visual screening, in the form of infill planting of the existing hedgerow, as well as the introduction of new native broadleaf woodland at the eastern boundary of Sub-Sites 7K and 7L, will be carried out to further reduce any visibility from this designated heritage asset. While it is acknowledged that the introduction of Solar PV Panels within these Sub-Sites will constitute a minor change to the wider setting of Oaks Farmhouse, the wider vistas are not a key part in demonstrating the setting of this heritage asset,

ID	Theme	Comments/Issues Raised	Applicant's Response
			nor is the significance of the property highly influenced by this setting. The assessment concluded that the overall significance of this designated heritage asset will not be harmed by the Scheme.
WPC-PDA-026	Cultural Heritage	Oaks Farmhouse is not an isolated heritage asset. It derives part of its significance from its historic agricultural context and relationship with the surrounding farmland. The proposed development would introduce solar infrastructure into agricultural land located in very close proximity to the property. The assessment reviewed so far does not clearly demonstrate how the effect on this historic agricultural setting has been considered.	The wider historic landscape and impact of the Scheme has been assessed through the use of desk-based assessment, aerial investigation, geophysical survey and trial trenching, provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment Part 2 [AS-020 and AS-021], ES Volume 3 Appendix 10.3 Archaeological Geophysical Survey Report [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey Part 1 [AS-023], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey Part 2 [AS-024], ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [APP-172]. The setting of the Scheme on the heritage asset is provided in ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168].
WPC-PDA-027	Cultural Heritage	This issue may be particularly relevant given that the surrounding land attached to Oaks Farm continues to form part of an	Effects on farm businesses outwith the Scheme have not been assessed as there are no likely effects on these businesses arising due to the Scheme. Effects on farm businesses within the

ID	Theme	Comments/Issues Raised	Applicant's Response
	Soils and Agricultural Land	active family agricultural business used for sheep grazing and hay production.	Scheme have been assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] .
WPC-PDA-028	Landscape and Visual	A further concern is that Oaks Farmhouse does not appear to have been specifically assessed as an identified visual receptor within the Landscape and Visual Impact Assessment documentation reviewed to date. ¹⁷	Oaks Farmhouse was not identified as either a representative viewpoint or a specific view location within the LVIA (presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]). In accordance with the LVIA methodology, visual effects are assessed through a series of representative, specific and illustrative viewpoints selected from publicly accessible locations. These viewpoints are intended to represent the views experienced by defined groups of visual receptors rather than individual private views from specific properties. The visual amenity of the area surrounding Oaks Farmhouse is represented by the nearest assessed viewpoints, namely VL12/Site 7 and VL17/CRC. The assessment concluded that neither viewpoint would experience Significant visual effects during construction, operation or decommissioning. In addition, Oaks Farmhouse falls outside the 100 m study area adopted for the Residential Visual Amenity Assessment (RVAA)[APP-148]. Properties beyond this study area were considered unlikely to experience effects of a magnitude

¹⁷ East Pye Solar, 6.1.7 Environmental Statement Volume 1: Chapter 7 – Landscape and Visual – Revision 1, March 2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			sufficient to meet the RVAA threshold and were therefore not subject to detailed residential visual amenity assessment.
WPC-PDA-029	Landscape and Visual	The applicant states that it considered impacts on residential properties and heritage assets during design development and that design changes were made elsewhere in response to heritage concerns. The applicant also states that buffer distances around dwellings were reviewed and amended following consultation and landscape assessment work. However, it is not apparent from the documentation currently reviewed that a specific landscape and visual assessment has been undertaken from proximity to Oaks Farmhouse itself, notwithstanding: • its proximity to Sub-Site 7L; • its status as a Grade II* Listed Building; • its position within an agricultural landscape that contributes to its setting; and • its direct relationship with Sites 7K and 7L.	No design changes were proposed in relation to Oaks Farmhouse, as significant visual effects were not identified within the LVIA.

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-030	Cultural Heritage	The only visual assessment that could be found within the documentation provided by East Pye Solar for examination appears to have only assessed the visual aspect from Woodton Road 0.3 miles away from Oaks Farmhouse.¹⁸ 	The closest representative view location to Oaks Farmhouse is VL12/Site 7, which is approximately 150m to the west of Oaks Farmhouse. VL17/CRC is approximately 500m to the east of Oaks Farmhouse.
WPC-PDA-031	Landscape and Visual	Although East Pye state that they will introduce some screening to apparently reduce the visibility from Oaks Farmhouse¹⁹: “Sub-Sites 7I-7L Visual screening in the form of infill planting of the existing hedgerows and introduction of new native broadleaf woodland at the eastern	The contribution of Sub-Sites 7I-7L to the significance of Oaks Farmhouse and the introduction of additional planting and gapping up of hedgerows at the eastern edge of Sub-Site 7I is discussed in ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. That document found that the agricultural land within Site 7 only made a limited contribution to the significance of Oaks Farmhouse through forming a part of its wider setting and that with embedded mitigation in the form of the additional planting

¹⁸ East Pye Solar, 6.3.7.6 Environmental Statement Volume 3: Appendix 7.6 – Figure 7.6.7 Visualisations – Site 7, April 2nd 2026: p. 38. [Reference by Woodton Parish Council].

¹⁹ East Pye Solar, 6.1.1.0 Environmental Statement Volume 1: Chapter 10 – Cultural Heritage – revision 1, March 2026, p: 42. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		boundary of Sub-Site 7L to reduce visibility from the Gate II* listed Oaks Farmhouse." This is without any assessment to state why this may be needed or may benefit the cultural heritage of Oaks Farmhouse.	there would be a negligible impact upon the significance of Oaks Farmhouse.
WPC-PDA-032	Cultural Heritage Landscape and Visual	The Examining Authority is respectfully requested to ask the Applicant: 1. What specific assessment has been undertaken of the effects of Sub-Sites 7K and 7L on the setting and significance of Oaks Farmhouse (Grade II*)? 1. How has the Applicant assessed the contribution made by the surrounding agricultural landscape to the significance of Oaks Farmhouse? 2. Has the cumulative impact of both Sub-Sites 7K and 7L on Oaks Farmhouse been assessed, and if so where is that assessment set out within the application documents? 3. Was Oaks Farmhouse assessed as a landscape and visual receptor within the Landscape and Visual	<u>Landscape</u> Landscape 2 & 3: Refer to the Applicant's response in WPC-PDA-028. While no property-specific cumulative assessment has been undertaken for Oaks Farmhouse, for the reasons set out above, cumulative effects have been assessed as part of the LVIA [APP-043], including the cumulative assessment presented in Section 7.11. Landscape 4: Oaks Farmhouse is represented by visual receptor at VL12/Site 7 and VL17/CRC, the photography are presented in Appendix 7.5 - Photosheets - Site 7 [APP-131] and Appendix 7.5 - Photosheets - Cable Route Corridor [APP-124]. The closest visualisation is VL11/Site 7 and VL13 /Site 7, these are presented in Appendix 7.6 - Figure 7.6.7 Visualisations - Site 7 [APP-143]. Landscape 5: No significant visual effects were identified at VL12/Site 7 and VL17/CRC within the LVIA.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Impact Assessment? If not, why not? 4. What viewpoints, photomontages or visual representations were used to assess the effect of the development as experienced from Oaks Farmhouse? If none were prepared, please explain the basis on which visual effects were assessed. 5. How has the Applicant concluded that the heritage and visual effects on Oaks Farmhouse have been adequately assessed given its proximity to the proposed development and its Grade II* status? This matter is directly relevant to the ExA's principal issues concerning: Cultural heritage; and Landscape and visual.²⁰	<u>Cultural Heritage</u> Cultural Heritage 1, 1, 2: Specific assessment of Oaks Farmhouse in terms of the contribution of the surrounding agricultural landscape to the significance of the building and the potential effects of the Scheme upon that significance (including both Sub-Sites 7K and 7L) is presented in ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. These have not been assessed as cumulative effects but as a whole (i.e. all parts of the Scheme that could present an impact to Oaks Farmhouse). Cultural Heritage 4 & 5: The assessments presented in ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168], which have informed the conclusions of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], have been undertaken in accordance with all relevant policy and guidance (see section 2 of ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]). In terms of potential heritage impacts the assessment has included both viewshed analysis specific to Oaks Farmhouse and site visits. The Applicant is happy

²⁰ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			that the assessment and conclusions of those reports are robust and justifiable.
WPC-PDA-033	Aviation	Potential Effects on Established Microlight Aviation Activity at Oaks Farm Land associated with Oaks Farmhouse contains an established grass runway used for microlight operations. The runway has existed for many years and was specifically brought to the Applicant's attention during consultation. In consultation responses, the Applicant was advised of: "The impact on our established grass runway 06/24 whose 06 threshold is approximately 10 metres from the eastern end of Sites 7L and 7K."²¹ Despite being made aware of this aviation activity, it is unclear whether the Applicant has identified the runway within the project baseline or undertaken any assessment of the effects of the proposed development on its continued operation. This is of	The Applicant has reviewed available aeronautical resources to identify aerodromes and airfields within the assessment area. This has included the resources outlined in Chapter 3 of '<i>Civil Aviation Publication (CAP) 760: Safe Operating Practices at Unlicensed Aerodromes</i>' in addition to information available to General Aviation pilots through commonly used flight-planning resources such as <i>SkyDemon</i>. The aerodrome being referred to as Oaks Farm was not identified within these resources, nor the aerodrome's operator, operational status, runway characteristics or level of aviation activity. The available resources for Oaks Farm, reviewed by the Applicant, indicates that the unlicensed aerodrome consists of a grass strip that is not visibly marked with conventional runway thresholds. The level of aviation activity is therefore likely to be limited in scale and nature. Embedded mitigation measures through panel configuration (panel heights, tilt angle and azimuth

²¹ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100024872>. Accessed on 17.08.2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		particular concern because the eastern end of Sites 7K and 7L lies in very close proximity to the runway threshold.	angle) would apply to mitigate impacts towards Oaks Farm.
WPC-PDA-034	Glint and Glare Aviation	Based on the documentation reviewed, it is not apparent whether the Applicant has assessed: - the potential for glint and glare effects affecting aircraft using the runway; - whether the proximity of solar infrastructure could affect take-off and landing operations; - the effect of construction activity on aviation safety; - any consequences arising from the loss of surrounding open land that may currently be available for precautionary or emergency landings; - whether the runway was incorporated into baseline surveys; - whether consultation was undertaken with aviation stakeholders in respect of this aviation use; or	Given the limited level of aviation activity, the Applicant considers that the potential for significant effects on aviation activity associated with Oaks Farm is low; Solar panels proposed as part of the Scheme are not in line with the extended runway centreline from threshold 24, and remains as per existing baseline environment. Therefore, the effect of construction activity and consequences arising from the loss of land from threshold 06 are low The aerodrome was not identified during initial scoping of the Scheme. Therefore, the runway was not incorporated into baseline surveys. Information regarding the aerodrome and its operator was not identified within the resources listed by the Applicant (response to WPC-PDA-034). Mitigation secured by the embedded mitigation measures secured by the panel configuration (panel heights, tilt angle and azimuth angle) would apply to mitigate impacts towards Oaks Farm.

ID	Theme	Comments/Issues Raised	Applicant's Response
		whether the cumulative effect of Sites 7K and 7L on the operation of the runway has been considered.	
WPC-PDA-035	Aviation	Although the Applicant has noted that they are in correspondence with Norfolk Gliding Club, Tibbenham Airfield, Seething Airfield and others in their response to consultation responses, the owner of the grass runway (owner of Oaks Farmhouse) has not been approached by the applicant. ²²	The Applicant refers to the answers provided for WPC-PDA-034 and WPC-PDA-035.
WPC-PDA-036	Aviation	The Examining Authority is respectfully requested to ask the Applicant: - Whether the microlight runway at Oaks Farm was included within the environmental baseline used to prepare the application. - Whether the Applicant recorded and considered the consultation response relating to the runway and its proximity to Sites 7K and 7L.	The Applicant refers to the answers provided for WPC-PDA-034 and WPC-PDA-035.

²² East Pye Solar, 5.11 Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		3. What assessment was undertaken of possible glint and glare effects on aircraft using the runway. 4. Whether any assessment was undertaken of the impact of Sites 7K and 7L on take-off, landing and aviation safety. 5. Whether the Applicant considered the effect of the development on the availability of nearby open land currently capable of accommodating precautionary or emergency landings. 6. Whether any aviation bodies, microlight organisations or relevant stakeholders were consulted as part of the assessment process. 7. If no such assessment was undertaken, why the Applicant considers the Environmental Statement adequately assesses the environmental effects arising from the proposal's proximity to an established aviation use.	

ID	Theme	Comments/Issues Raised	Applicant's Response
WPC-PDA-037	Aviation	Given that the Applicant was notified of the existence of an established grass runway whose threshold lies approximately 10 metres from the eastern end of Sites 7K and 7L, it is unclear why no specific assessment of the interaction between the proposed development and this aviation activity can be readily identified within the application documents reviewed. The Examining Authority is therefore requested to seek clarification from the Applicant as to whether this matter has been assessed and, if so, where that assessment can be found within the submitted application documents. This matter is directly relevant to the ExA's principal issues concerning: Aviation.²³	The Applicant refers to the answers provided for WPC-PDA-034 and WPC-PDA-035.
WPC-PDA-038	Book of Reference	Failure to Identify Oakdene Cottage as a Category 3 Person The owners and occupiers of Oakdene Cottage were not identified within the Book of Reference, despite the property directly adjoining the Order Limits at Site 7L. The	The Applicant notes the Respondent's request to be identified as a Category 3 interest. In preparing the Book of Reference [APP-022] , the Applicant undertook a detailed assessment of all land interests that may be affected by the Scheme, drawing on land referencing investigations, environmental assessments and other relevant

²³ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		Book of Reference contains the names and addresses of persons who, following diligent inquiry, are considered to be persons who "would or might be able to make a relevant claim" arising from implementation of the Order. The document expressly states that Category 3 persons may include individuals with interests in land outside the Order Limits who may be entitled to compensation as a result of the construction or operation of the Scheme.²⁴ 	project information. This assessment was carried out in accordance with the requirements of the Planning Act 2008. On the basis of that assessment, the Applicant concluded that the Respondent does not meet the statutory definition of a Category 3 person. Accordingly, the Respondent has not been included within the Book of Reference [APP-022] as a Category 3 party. The Applicant remains satisfied that the Book of Reference [APP-022] has been prepared appropriately and accurately identifies those persons who, based on the evidence available, meet the relevant statutory criteria.
WPC-PDA-039	Book of Reference	The residential curtilage of Oakdene shares a boundary with land proposed for development, with resulting in solar infrastructure being located immediately adjacent to their property.	The Applicant acknowledges the concerns raised regarding the potential effects of the Scheme. Category 3 is a specific statutory classification under section 57 of the Planning Act 2008. Category 3 persons are those whom the Applicant considers might be entitled to make a "relevant

²⁴ East Pye Solar, 4.1 Statement of Reasons – Revision 1, March 2026: p. 36. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		Given the close physical relationship between Oakdene Cottage and Site 7L, it is unclear how the Applicant concluded that the owners and occupiers of Oakdene Cottage would not, or might not, be persons capable of making a relevant claim. The property is not a distant receptor but an immediately adjoining residential dwelling. In these circumstances, the occupiers appear to fall within the category of persons who might potentially be affected by the implementation or operation of the authorised development.	claim" for compensation if the DCO is made and fully implemented. The relevant claims are those under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 and section 152(3) of the Planning Act 2008. The assessment of whether an interest is considered a Category 3 interest is based on the potential impact of the project and not solely the distance to the project. The exclusion of an interest from Category 3 does not preclude that interest from making a compensation claim under the relevant legislation should they believe they have a valid claim. Category 3 status is a classification for the purposes of the DCO application and reflects the Applicant's assessment, based on the information available following diligent inquiry, of whether a person might be entitled to make one of the relevant claims identified in section 57. Any entitlement to compensation would ultimately depend upon the relevant statutory provisions and the circumstances of the individual case.
WPC-PDA-040	Consultation and Engagement	Additionally, the owners of Oakdene Cottage made East Pye Solar aware that they had not been consulted – East Pye did not investigate and only provided this comment²⁵:	The Applicant notes the Respondent's request to be identified as a Category 3 interest. In preparing the Book of Reference [APP-022], the Applicant undertook a detailed assessment of all land interests that may be affected by the Scheme,

²⁵ East Pye Solar, Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026: p.323. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised				Applicant's Response
		EPS2 OF 056	Respondent expressed they had not been consulted despite being surrounded by proposals in Oakdene, Shotesham Road, Woodton.	No	The Applicant notified over 8,400 addresses of the opportunity to take part in the Phase Two consultation via a Community Consultation Postcard. This core consultation zone was identified and described in the published Statement of Community Consultation (SoCC, 4 June 2025),	drawing on land referencing investigations, environmental assessments and other relevant project information. This assessment was carried out in accordance with the requirements of the Planning Act 2008. On the basis of that assessment, the Applicant concluded that the Respondent does not meet the statutory definition of a Category 3 interest. Accordingly, the Respondent has not been included within the Book of Reference [APP-022] as a Category 3 party. The Applicant remains satisfied that the Book of Reference has been prepared appropriately and accurately identifies those persons who, based on the evidence available, meet the relevant statutory criteria.

ID	Theme	Comments/Issues Raised					Applicant's Response
					provided in Consultation Report Appendix 5 - Statement of Community Consultation Materials [EN0110014 /APP/5.6]. This distribution area was identified by extending a minimum distance of two kilometres from the boundaries of the Solar PV Sites and 500 metres from the edge of the Cable Route		

ID	Theme	Comments/Issues Raised					Applicant's Response
					Corridor and other proposed infrastructure as presented as were to be presented at Phase Two consultation. Where proportionate and reasonable, the zone was extended further subject to the consideration of: Existing natural and human geographical boundaries		

ID	Theme	Comments/Issues Raised				Applicant's Response
				Avoiding splitting communities Full coverage of the host parties that host any of the Scheme. Through the Applicant's website, individuals had the opportunity to register to be kept informed about the proposals. This facility has been available since September 2024. The Applicant has and will		

ID	Theme	Comments/Issues Raised					Applicant's Response
						continue to provide updates to those that have registered to be kept informed. Furthermore , the Applicant contacted 1,800 properties that it identified as being Section 44 consultees (landowners) in respect to the Scheme. Further information on the	

ID	Theme	Comments/Issues Raised					Applicant's Response
					notification methods used by the Applicant can be found in the Consultation Report [EN0110014 /APP/5.1] .		
WPC-PDA-041	Book of Reference	The Book of Reference adopts a deliberately broad threshold by referring to persons who "would or might" be able to make a relevant claim. However, no explanation has been provided as to whether Oakdene was assessed as part of the Applicant's land referencing exercise or why it was excluded from the Category 3 schedule. 					The Applicant confirms that Oakdene was considered as part of the land referencing exercise undertaken in preparing the Book of Reference [APP-022]. Category 3 comprises persons who the Applicant considers would or might be entitled to make a relevant compensation claim if the DCO is made and fully implemented. The relevant claims are those under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 and section 152(3) of the Planning Act 2008. In assessing whether Oakdene should be identified as a Category 3 interest, the Applicant considered the potential effects of the Scheme on the property and whether these could give rise to a relevant compensation claim. This included consideration of

ID	Theme	Comments/Issues Raised	Applicant's Response
			the relevant technical assessments supporting the DCO application. As part of the assessment, a noise, vibration and glint and glare assessment were undertaken. The Noise and Vibration Assessment (presented in ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]) did not identify Oakdene as being adversely affected to an extent which would indicate a potential compensation claim. The Glint and Glare Assessment (presented in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment Part 1 [AS-025]) similarly did not identify an adverse effect at the relevant receptor. Having considered the information available following diligent inquiry and the applicable statutory compensation provisions, the Applicant did not identify circumstances indicating that the owner or occupier of Oakdene would or might be entitled to make a relevant claim. Oakdene has therefore not been included as a Category 3 interest in Part 2 of the Book of Reference [APP-022].
WPC-PDA-042	Landscape and Visual	The omission raises concerns regarding the adequacy of the Applicant's diligent inquiry process especially as they have assessed that there is a need for a buffer	The Applicant does not agree that the omission of Oakdene Cottage from the detailed visual assessment raises concerns regarding the adequacy of the diligent inquiry process. The application of landscape mitigation is a standard and integral part of the design process for DCO

ID	Theme	Comments/Issues Raised	Applicant's Response
		zone of vegetation around Oakdene Cottage's boundary. ²⁶	projects and reflects the application of the mitigation hierarchy.
WPC-PDA-043	Book of Reference	In particular, the Examining Authority may wish to understand: • Whether Oakdene Cottage was identified during land referencing investigations. • Whether the property was assessed for inclusion as a Category 3 interest. • The reasons for any decision not to include the property within Part 2 of the Book of Reference. • Whether the omission affected the occupiers' opportunity to participate in the DCO process as affected persons. The Examining Authority is requested to require the Applicant to: 1. Explain whether Oakdene Cottage was reviewed as part of the Category 3 assessment process.	The Applicant has provided a response to comments raised by WPC on Category 3 interests. The Applicant therefore refers to its response to comment ID WPC-PDA-038, WPC-PDA-040 and WPC-PDA-041.

²⁶ East Pye Solar, 2.3 Works Plan – Revision B. April 2026: p. 11. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		2. Set out the reasoning for its omission from the Book of Reference. 3. Demonstrate how the Applicant's diligent inquiry exercise adequately identified all persons who "would or might" be capable of making a relevant claim as a result of the Scheme. This matter is directly relevant to the ExA's principal issues concerning: Community, health and wellbeing.²⁷	
WPC-PDA-044	Ecology and Biodiversity	Ecological Connectivity: Shotesham–Woodton Woodland Complex The Applicant identifies the Shotesham-Woodton Hornbeam Woods SSSI and associated woodland network around Sub-Sites 7F, 7G, 7H and 8B as an important ecological receptor. The Environmental Statement, design evolution process, Green Infrastructure Strategy and Landscape and Ecology Management Plan all refer to strengthening habitat corridors,	The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets, including enhancing ecological connectivity between off-sites ecological features of interest. A visual representation of proposed habitat connectivity enhancements is presented within the Green Infrastructure Strategy [AS-005]. This is secured through its inclusion in the Outline LEMP [APP-199] which is secured under Requirement 7 in the Draft DCO [AS-032].

²⁷ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		increasing woodland connectivity and improving ecological resilience across this part of the Scheme. Woodton Parish Council does not dispute that ecological enhancement measures are proposed. However, it seeks clarification regarding the evidential basis upon which enhancement of functional connectivity has been concluded.	Existing features within and immediately surrounding the Sites such as woodlands, hedgerows, ditches which provide ecological connectivity between the Shotesham-Woodton Hornbeam Woods SSSI woodlands are strengthened through appropriate buffering and habitat enhancements providing improved long-term connectivity. A quantitative assessment of habitat enhancement value is provided within the Biodiversity Net Gain Statutory Metric [APP-219]; whilst not solely considering functional connectivity, this does calculate all habitat value, including habitats created to enhance ecological connectivity and therefore, does quantify enhanced functional connectivity via habitat unit calculations. Whilst the Schemes design evolution was understandably progressed prior to the publication of the LNRS on 31st October 2025, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to enhance ecological connectivity. Where possible, areas of land located within the Order Limits identified as having potential to become of particular importance to biodiversity and contribute to enhanced landscape scale ecological connectivity if suitable nature recovery actions are carried out, known as 'areas that could become of particular importance' (ACB) within the LNRS Local

ID	Theme	Comments/Issues Raised	Applicant's Response
			Habitat Map have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] , thereby providing enhanced opportunities for biodiversity within and around the Order Limits.
WPC-PDA-045	Ecology and Biodiversity	The Applicant has also undertaken substantial bat survey work, which identifies high levels of bat activity across the Order Limits, records significant barbastelle activity associated with the Shotesham-Woodton Hornbeam Woods SSSI woodland complex and concludes that the landscape provides important foraging and commuting habitat connected to the wider woodland network. The bat assemblage within the order limits is assessed as being of national importance. ²⁸	ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] has included reference and consideration of the importance of the Site and wider surrounding landscape for bat species; this includes reference to bat roost records at Shotesham-Woodton Hornbeam Woods SSSI.
WPC-PDA-046	Ecology and Biodiversity	However, although ecological connectivity is repeatedly referenced as a benefit of the Scheme, it is unclear whether the Applicant has undertaken a formal landscape-scale ecological connectivity assessment capable of quantifying:	ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] has included reference and consideration of the importance of existing ecological features within the Order Limits and their importance for connectivity. This includes the consideration of the provision of habitat enhancements designed to buffer important

²⁸ East Pye Solar, Environmental Statement Volume 3: Appendix 8.6 – Bat activity Survey Report – Revision 1, March 2026: p. 65. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		- existing connectivity within the woodland network; - the relative importance of individual woodland parcels and corridors; - existing ecological pinch points and movement pathways; - changes to network functionality during construction; - temporary effects during habitat establishment; and - whether connectivity will be enhanced in measurable terms following implementation of the proposed mitigation and enhancement measures.	features and strengthen ecological connectivity in the wider landscape. A visual representation of proposed habitat connectivity enhancements is presented within the Green Infrastructure Strategy [AS-005]. This is secured through its inclusion in the Outline LEMP [APP-199] which is secured under Requirement 7 in the Draft DCO [AS-032]. See response WPC-PDA-044 (above) for reference to the approach to connectivity assessment.
WPC-PDA-047	Ecology and Biodiversity	The Biodiversity Net Gain Report demonstrates significant habitat unit gains and references the Norfolk Local Nature Recovery Strategy but does not appear to provide a quantified ecological network assessment. ²⁹	The Applicant refers to its responses on BNG, the Green Infrastructure Strategy, and LNRs provided within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID MFPC-005, SNPC-027, SePC-008 and SPC-067.
WPC-PDA-048	Ecology and Biodiversity	In consultation, a respondent noted that:	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant

²⁹ East Pye Solar, Biodiversity Net Gain Report – Revision 1, March 2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response				
		"The development lies close to important protected habitats including Pulham Market Big Wood SSSI and the Shotesham-Woodton Hornbeam Woods SSSI complex, raising concerns regarding habitat fragmentation, impacts on protected and red-listed species, and conflict with the objectives of Norfolk's Local Nature Recovery Strategy and the wider Nature Recover Network established under the Environmental Act 2021."³⁰ The Applicant provided this response: <table border="1"> <tr> <td>EPS2 _EF_ 015</td><td>Respond ent expresse d concern for the impact of constructi on on SSSI Hornbea m wood.</td><td>No</td><td>The potential impact on Hornbeam Wood SSSI has been assessed within ES Volume 1, Chapter 8 - Ecology and</td></tr> </table>	EPS2 _EF_ 015	Respond ent expresse d concern for the impact of constructi on on SSSI Hornbea m wood.	No	The potential impact on Hornbeam Wood SSSI has been assessed within ES Volume 1, Chapter 8 - Ecology and	Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BAPC-003, HePC-007, SPC-010, SPC-066, and BAPC-003.
EPS2 _EF_ 015	Respond ent expresse d concern for the impact of constructi on on SSSI Hornbea m wood.	No	The potential impact on Hornbeam Wood SSSI has been assessed within ES Volume 1, Chapter 8 - Ecology and				

³⁰ East Pye Solar, Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026: p. 258. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised				Applicant's Response
					Biodiversity [EN0110014 /APP/6.1.8]. No significant effects on Statutory Designated Sites – including Hornbeam Woods SSSI have been identified during the construction of the Scheme.³¹ The Applicant's response is framed solely around whether the Scheme would result in significant effects on the designated SSSI itself and concludes that no significant effects on the Shotesham-Woodton Hornbeam Woods SSSI have been identified. Whilst this addresses the	

³¹ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023312>. Accessed on 19.08.2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		statutory designation, it does not fully engage with the wider ecological concern raised.	
WPC-PDA-049	Ecology and Biodiversity	Similarly, while the Bat Activity Survey provides extensive data on bat abundance and habitat use, it also notes limitations in fully capturing all flight paths and does not appear to present a formal connectivity model such as least-cost path modelling, network analysis, habitat permeability assessment or connectivity indices.	The Applicant refers to its responses provided on bat surveys within The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] under comment ID GMAG-094 and GMAG-104.
WPC-PDA-050	Ecology and Biodiversity	Consequently, there remains uncertainty as to whether the Applicant's conclusions regarding connectivity enhancement are supported by quantitative evidence or are primarily based on professional judgement and the anticipated benefits of habitat creation and management.	The Applicant refers to its responses provided on bat surveys within The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010] under comment ID GMAG-104.
WPC-PDA-051	Ecology and Biodiversity	The Examining Authority may wish to seek further clarification from the Applicant regarding: 1. Can the Applicant confirm whether a formal ecological connectivity assessment has been undertaken for the woodland network associated with the Shotesham Woodton Hornbeam Woods SSSI, including the surrounding ancient	Please see response WPC-PDA-044 (above) regarding responses to the assessment of ecological connectivity between the surrounding ecological site network. The Applicant further confirms that safeguards provided in the Outline CEMP [APP-196] , which will be implemented by a detailed CEMP and secured through the Draft DCO [AS-032] will avoid impacts to surrounding designated Sites during construction. ES Volume 1, Chapter 8 -, Ecology

ID	Theme	Comments/Issues Raised	Applicant's Response
		woodland and County Wildlife Site network? 2. Can the Applicant identify the principal woodland blocks, hedgerow corridors and stepping-stone habitats that comprise the functional network associated with the Shotesham-Woodton Hornbeam Woods SSSI and how the Scheme has been designed to maintain or enhance those routes? 3. Can the Applicant provide evidence demonstrating that ecological connectivity within the woodland network will be maintained during the construction phase, particularly where temporary cable route works, habitat disturbance or vegetation management are proposed? This matter is directly relevant to the ExA's principal issues concerning: Ecology and	and Biodiversity [APP-044] concludes that there will be no significant effects upon these ecological features during the construction phase operations.

ID	Theme	Comments/Issues Raised	Applicant's Response
		biodiversity (including Habitats Regulations Assessment). ³²	
WPC-PDA-052	Book of Reference Soils and Agricultural Land	Site 10 Plot 06-008 and Old Hall Farm – Request for Further Justification of Permanent Rights Acquisition The Book of Reference provided by the applicant identifies Plot 06-008 as approximately 31,884ha of agricultural land east of Shotesham Road, over which the Applicant seeks permanent rights rather than temporary possession or freehold acquisition. The Applicant's general case is that rights are being sought rather than ownership because this represents a lesser interference with private property rights and is therefore a more proportionate exercise of compulsory acquisition powers. This position is set out in the Explanatory	The Applicant considers that the plot reference in the representation is incorrect. Plot 06-008 does not appear to be the land to which the representation relates. The Applicant understands that the representation is instead referring to Plots 04-043, 06-001 and 06-005 Point 4 - Effects on farm businesses outwith the Scheme have not been assessed as there are no likely effects on these businesses. The Applicant believes the reference within the Book of Reference [APP-022], refers to plot 06-008 as 31,884 square metres as opposed to hectares. The Applicant confirms that they are seeking permanent rights over plot number 06-008 due to the nature of the rights sought. The applicant is proposing to put in place an easement with the landowner for the construction, operation and maintenance of the underground cabling to connect Solar Array site 10 to site 7E. This has been included within the heads of terms for option

³² The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		Memorandum and the Statement of Reasons. However, while the Applicant provides a project-wide justification for acquiring rights, there has been a lack of assessment as to: 1. Why permanent rights are required across the full extent of Plot 06-008; 2. Why a smaller area of rights would not achieve the same purpose; 3. What consideration has been given to the operational requirements of the existing dairy farm enterprise; and 4. How the proposed permanent restrictions would affect the future viability and operation of the dairy farming business.	agreement for an easement which has been issued and discussed with the respondent. The proposed rights sought are common practice for utility and infrastructure schemes. The area included within plot number 06-008 set out in the Land Plan [APP-006] page 8 (sheet 6) is proportionate to the rights sought with an adequate width for a working area for the proposed construction works. The resulting easement will be located within this and will be made up of a smaller area of permanent rights, proposed to be 10 metres wide. The Applicant acknowledges the concerns of the Respondent with regards to the ongoing operations of the existing dairy enterprise. The Applicant remains committed to meaningful engagement with all land interests and wishes to continue discussions regarding heads of terms with the respondent and their appointed agent. The Applicant seeks to minimise disruption to affected farming businesses where practicable and is committed to working with all land interests to achieve this. Where there are any residual impacts on farm businesses, the Applicant will engage with landowners to compensate them through voluntary agreements or through the statutory compensation mechanisms associated with the exercise of compulsory acquisition powers.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant is continuing to engage with landowners to understand potential impacts on their business and welcomes engagement from the Respondent. Construction works in Cable Route Corridor would be temporary in nature. Once the cable has been laid underground, the land will be reinstated and soils restored to the previous condition (as set out in Outline SRMP [APP-2024]), allowing for activities such as farming to continue.
WPC-PDA-053	Book of Reference Soils and Agricultural Land	Plot 06-008 forms part of an active dairy farming enterprise called Old Hall Farm. The land is used in connection with the keeping and movement of cattle and is integral to the operation of the wider holding. The farm itself is also open to members of the public and includes a visitor destination and café, meaning the business operates as more than a conventional agricultural unit. The land therefore supports both food production and diversification activities that contribute to the rural economy. The Mayhew family, who own the farm have been farming in Woodton since the mid-1940s, add to the cultural significance of this farming venture.	The Applicant considers that the plot reference in the representation is incorrect. Plot 06-008 does not appear to be the land to which the representation relates. The Applicant understands that the representation is instead referring to Plots 04-043, 06-001 and 06-005 The Applicant acknowledges the concerns of the respondent with regards to the ongoing operations of the existing dairy enterprise, farm shop and wider agricultural business. Effects on farm businesses are assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. In terms of the effects on farm businesses from the cable route construction, there may be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes.

ID	Theme	Comments/Issues Raised	Applicant's Response
		 33 The Applicant's assessment appears to treat Plot 06-008 simply as agricultural land within a rights corridor, without demonstrating that proper regard has been given to the existing and continuing use of the land by a working dairy farm. This is despite the owners making East Pye Solar aware of the impact this would have on their business in the consultation period:	The Applicant remains committed to meaningful engagement with all land interests and wishes to continue discussions regarding a voluntary agreement with the respondent. The Applicant seeks to minimise disruption to affected farming businesses where practicable and is committed to working with all land interests to achieve this. Where there are any direct proven business losses from the works, the Applicant will engage with landowners to compensate them through voluntary agreements or the compensation mechanisms available for the use of compulsory acquisition powers. The Applicant is continuing to engage with landowners to understand potential impacts on their businesses. During the construction phase of the project the Applicant can establish temporary crossing points across the cable construction corridor to facilitate access to land either side of the corridor. The requirement and potential locations of these crossing points have been discussed with the owner of the farm and the Applicant will continue to engage with the landowner. The Applicant has previously responded to a representation [RR-1594] made by this land

³³ Old Hall Farm. <https://www.oldhallfarm.co.uk/about-us/our-story>. Accessed 17.08.2026.

ID	Theme	Comments/Issues Raised	Applicant's Response
		"The cable route for the proposed project will cut our farm in two and we will not be able to access over half of our land for grazing our livestock. The cable route for the proposed project will also have a significant impact on our farm shop and restaurant which is located immediately adjacent the route."³⁴ "Project is not well thought out or designed. Will cut our farm in two."³⁵ "Although we are advised that the Cable Route Corridor will be a maximum of 50m wide whilst it's under construction the land in which it is situated will be out of use for farming purposes. Old Hall Farm Woodton is one such business. The proposed Site 10 would mean that access to half of their fields will be impossible for as long as it takes to lay the cables. There are also concerns that the herd of Jersey cows will	interest in The Applicants Response to Relevant Representations Part 5 - By Theme [PDA-012].

³⁴ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100022950>. Accessed on 17.08.2026. [Reference by Woodton Parish Council].

³⁵ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100022952>. Accessed on 17.08.2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised				Applicant's Response					
		be disrupted by the voltage running under the ground once the cables are laid.”³⁶ The applicants only response to Old Hall Farm in consultation was regarding Landscape Visual Assessment: <table><tr><td>EPS2_LF_308, EPS2_OF_027, EPS2_PF_046</td><td>Respondent expressed that mitigation measures should address the issues raised regarding impacts to public rights of way (PRoWs).</td><td>No</td><td colspan="2">The LVIA has assessed effect on local Landscape Character and visual effects on receptors using PRoWs, including those around Saxlingham Nethergate and Hempnall</td></tr></table>				EPS2_LF_308, EPS2_OF_027, EPS2_PF_046	Respondent expressed that mitigation measures should address the issues raised regarding impacts to public rights of way (PRoWs).	No	The LVIA has assessed effect on local Landscape Character and visual effects on receptors using PRoWs, including those around Saxlingham Nethergate and Hempnall		
EPS2_LF_308, EPS2_OF_027, EPS2_PF_046	Respondent expressed that mitigation measures should address the issues raised regarding impacts to public rights of way (PRoWs).	No	The LVIA has assessed effect on local Landscape Character and visual effects on receptors using PRoWs, including those around Saxlingham Nethergate and Hempnall								

³⁶ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023521>. Accessed on 17.08.2026. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised				Applicant's Response
			They noted that the Scheme could alter the character of the PRow network, going against the provisions of planning policy and local Landscape Character Assessments.		(Sites 5 and 7) and Old Hall Farm in Woodton (Site 10). Mitigation includes woodland blocks, tree belts, and hedgerow planting to screen views and reduce visual intrusion. While a 500m buffer is not feasible due to land constraints, enhanced planting and careful siting will help protect	

ID	Theme	Comments/Issues Raised				Applicant's Response
			d concern for visual impact on areas around footpaths around Saxlingham Nethergate and Hemphall (Site 5 and Site 7) also old hall farm in Woodton (Site 10). One respondent expressed they would support a minimum		views and the recreational experience. Detail of landscape mitigation is presented in Outline Landscape and Ecological Management Plan (OLEMP) Appendix 2 Figure 2: Green Infrastructure Strategy [EN0110014 /7.4].	

ID	Theme	Comments/Issues Raised				Applicant's Response
			of 500m buffer away from any road or PRowS.			
		37				
WPC-PDA-054	Book of Reference Soils and Agricultural Land	The Applicant's compulsory acquisition documentation relies primarily upon broad statements that rights are needed to facilitate the authorised development and that acquisition of rights is preferable to acquisition of ownership. However, they have not identified any plot-specific assessment demonstrating: • why permanent rights are required over 31,884 hectares in this location; • what permanent restrictions would apply in practice; • how those restrictions would affect grazing, livestock management, fencing, farm access, drainage				The Statement of Reasons [APP-020] sets out the Applicant's case justifying compulsory acquisition powers. For farm businesses within the CRC there will be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes. The Applicant believes the area listed has come from plot 06-008 on the Land Plan [APP-006] page 8 (sheet 6), which is listed as 31,884 m2. The corresponding sheet on the Works Plans shows that this land is required for the cable route corridor. The full scope of rights required in respect of that plot are then also listed in Schedule 8 (land in which only new rights etc. may be acquired) of the Draft DCO [AS-032]. Article 24 (Compulsory acquisition of rights) ensures that the undertaker may only acquire compulsorily such rights or

³⁷ East Pye Solar, Consultation Report Appendix 10: Section 47 Applicant Response Table – Revision 1, March 2026: p.159. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		works, future agricultural improvements or diversification activities; or • whether alternative routing, narrower corridors or temporary rights were considered.	impose such restrictive covenants over that land 'as is required for the authorised development or to facilitate, or as is incidental, to it'. Therefore, the exercise of any powers is inherently limited and suitably controlled. The permanent restrictions that would apply over the easement area are restrictions on the construction of new buildings or structures, the planting of trees, and other activities that could damage the apparatus or impede future access. These restrictions are necessary to protect the underground cable and ensure safe operation, maintenance and access for repair throughout the term of the easement. These provisions are proportionate and standard industry easement restrictions that apply to underground utility infrastructure. The proposed easement will not restrict normal agricultural activities. Where new field drainage is proposed, or repairs and maintenance to existing drainage systems required, such works will depend on the proximity to the underground apparatus. In these circumstances, the operator's consent may be required to ensure the integrity of the cable is not compromised. Certain activities may also need to be undertaken under the supervision of the operator. Reference to future diversification activities over the proposed easement area would

ID	Theme	Comments/Issues Raised	Applicant's Response
			be dependent on the nature of the diversified enterprise. The Applicant encourages landowners to be transparent about any plans they have for diversification over or near to the proposed cable route. During the pre-application stage of the project a wider search area for the cable route corridor was set. This was narrowed to the proposed route, as appears in the Order Limits and in the Land Plan [APP-006], following input from planning and other consultants.
WPC-PDA-055	Book of Reference Soils and Agricultural Land	Additionally, assessment has been undertaken for large areas of agricultural land owned by other farmers within the Order Limits, it is unclear whether equivalent assessment has been carried out for land subject to permanent rights acquisition within the Cable Route Corridor as only farm "within the order limits" have been included for assessment³⁸ "Table 15.8: Summary of Farm Businesses	Effects on farm businesses are assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. In terms of the effects on farm businesses from the cable route construction, there will be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes.

³⁸ East Pye Solar, 6.1.15 Environmental Statement Volume 1: Chapter 15 – Soils and Agricultural Land- Revision 1, March 2026: p. 27 [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised			Applicant's Response
		Farm Name	Area Farmed	Summary of Farming Enterprise	
		Farm Business 1	220 ha	Mostly arable farm with a combinable rotation of crops (wheat, barley, beans) sold to grain merchants for human consumption. Has a small herd of suckler cattle.	
		Farm Business 2	810 ha	Mostly arable enterprise with poultry enterprise. Growing a variety of crops (wheat, barley, oats, oilseed rape (OSR), beans, peas, triticale, linseed, miscanthus and maize). Crops sold for animal and human consumption, cover crops used for game cover.	

ID	Theme	Comments/Issues Raised			Applicant's Response
		Farm Business 3	460 ha	Arable farm with a rotation of combinable crops (wheat, barley, OSR, oats) some land has been taken out of production for SFI.	
		Farm Business 4	200 ha	Livestock farm with approximately 100 head suckler herd and up to 300 sheep. Cattle are sold off as stores.	
		Farm Business 5	231 ha	Arable farm growing combinables (wheat, barley and OSR). Some land set aside for countryside stewardship and SFI. Grain sold mostly to local mill for animal feed some sold to merchants.	
		Farm Business 6	400 ha	Arable farm growing a mix of combinables and sugar beet. Sugar beet is grown for use in AD plants,	

ID	Theme	Comments/Issues Raised			Applicant's Response
				combinables sold to merchants. Rents out a small parcel of land for grazing.	
		Farm Business 7	570 ha	Arable farm growing combinables (wheat, beans and OSR). Contractors carry out majority of farm work. Combinables sold to merchants.	
		Farm Business 8	570 ha	Arable farm growing wheat, beans, parsley, ley grass and sugar beet, plus agri-environmental crops sold for human, animal or energy use.	
		Farm Business 9	-	Land all farmed by contractors.	
		15.6.35 The sensitivity of the agricultural businesses are assessed as follows: 8 of the farm businesses are full-time farm businesses, one is farmed			

ID	Theme	Comments/Issues Raised	Applicant's Response
		by contractors but as part of a full-time contract with other land; • All the land within the Order Limits (excluding the CRC) is arable, grassland or under biodiversity management, with none of the land used for location-sensitive land uses such as dairy farming; • Consequently all of the farm businesses are classified as of low sensitivity in Table 15.3." The environmental assessment appears to focus primarily on the main solar development areas, whilst treating the Cable Route Corridor separately. This is despite the CRC being considered as "within the order limits" for other impact analysis such as ecology.	
WPC-PDA-056	Soils and Agricultural Land	In fact, as part of the consultation, Natural England highlighted that the lack of detailed agricultural land classification on the CRC should be undertaken and included in the management plans: "However, there are still issues that remain outstanding that require further information being provided. These includes soils	For the CRC, there will be limited impact from the works on agricultural land and soils. The works to install the cabling will take place over narrow strips of land and will be of short duration. The works will be carried out in accordance with the detailed SRMP which will be submitted and approved by the relevant planning authority, as secured by Requirement 18 in the Draft DCO [AS-032]. The

ID	Theme	Comments/Issues Raised	Applicant's Response
		matters, such as the provision of detailed Agricultural Land Classification (ALC) survey work to include the cable route corridor, clarification of the presence of peat, evidence of avoiding the siting of permanent infrastructure on Best and Most Versatile (BMV) land and the provision of a detailed Soil Resource and Management Plan. Clarification is also required on the need for protected species licences, and we advise that additional information regarding working around ancient woodland and ancient/veteran trees is included in the Landscape and Ecological Management Plan and Construction Environmental Management Plan.”³⁹ This comment was based on the fact that agricultural land classification prepared for East Pye Solar by Amet Property surveyed and classified only land that will be used for the solar sites themselves.⁴⁰ It does not	CRC will be subject to soil surveys to record soil physical characteristics such as horizon depth, texture and ALC grade prior to construction as set out in the Outline SRMP [APP-204]. The ALC of the CRC will be undertaken pre-construction, once the cable route has been refined to a specific alignment within the CRC. The deferral of ALC and soil surveys in cable route corridors has been accepted by Natural England and the Secretary of State on other solar NSIPs. For example: ■ EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the CRC survey can be controlled under the DCO; ■ EN010123 Heckington Fen where the SoS decision letter at 4.23 refers to the final SoCG with NE [REP5-048] in which agreement to a post DCO soil survey including ALC was reached.

³⁹ Representation from consultation feedback. [https://nsipdocuments.planninginspectorate.gov.uk/published-documents/EN0110014-000363547242%20Natural%20England%20Relevant%20Representations%20East%20Pye%20Solar%20Far m%20-%20EN0110014_Redacted.pdf](https://nsipdocuments.planninginspectorate.gov.uk/published-documents/EN0110014-000363547242%20Natural%20England%20Relevant%20Representations%20East%20Pye%20Solar%20Far%20m%20-%20EN0110014_Redacted.pdf). Accessed on 19.08.2026. [Reference by Woodton Parish Council].

⁴⁰ East Pye Solar, 6.3.15.1 Environmental Statement Volume 3: Appendix 15.1 – Agricultural Land Classification – Revision 1, March 2026: p. 20. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		appear that any further surveys have been done on this matter.	The Outline SRMP [APP-204] sets out the measures that will be developed in more detail in the detailed SRMP. The Outline SRMP [APP-204] provides the structure and the types of controls to be included within the detailed SRMP. The Applicant commits to ensuring that the works and restoration of any disturbed land does not result in any downgrading of agricultural land quality. All land affected will be kept at, or restored to, a comparable ALC grade either as part of construction or as part of decommissioning
WPC-PDA-057	Soils and Agricultural Land	Permanent rights are still sought over land within the Cable Route Corridor and therefore the effects on agricultural businesses remain relevant to the Examining Authority's consideration of necessity and proportionality. If agricultural land within the Cable Route Corridor has not been surveyed or assessed to the same level as agricultural land within the main development areas, there is a risk that the effect on individual farm businesses has not been fully understood. This is particularly relevant as active dairy farms according to the sensitivity receptor methodology being used in the soils and agricultural chapter would place a dairy farm as high sensitivity because:	The ALC of the CRC is not determined, as this corridor will not be affected except for short-term construction impacts. A detailed soil survey will be carried out across the CRC before construction as set out in the Outline SRMP [APP-204] . In terms of the effects on farm businesses from the cable route construction, there will be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes.

ID	Theme	Comments/Issues Raised	Applicant's Response
		"Dairy farms are reliant upon access to grazing land within walking distance to the farm buildings, for example, may be more sensitive to changes close to the farmyards than arable farms where whilst there may be cost and time implications, the particular land for fields may be less important. No farms are placed in the high sensitivity category as a result."⁴¹  As permanent rights are sought over land within the CRC, the effects on agricultural	

⁴¹ East Pye Solar, 6.1.15 Environmental Statement Volume 1: Chapter 15 – Soils and Agricultural Land- Revision 1, March 2026: p. 11 [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		businesses who use this land remain relevant to the Examining Authority's consideration of necessity and proportionality.	
WPC-PDA-058	Book of Reference Soils and Agricultural Land	The Examining Authority is respectfully requested to ask the Applicant: 1. The precise infrastructure or works requiring permanent rights over Plot 06-008; 2. The justification for the full spatial extent of the rights area; 3. The assessment undertaken of impacts on the dairy farming enterprise; 4. The assessment undertaken of impacts on the visitor and café business associated with the holding; 5. Whether alternatives involving a reduced rights corridor, temporary	1. The Applicant has provided responses to comments raised by WPC on the rights sought on the land. The Applicant therefore refers to its response to comment ID WPC-PDA-052 2. The Applicant has provided responses to comments raised by WPC on the justification of the rights sought on the land. The Applicant therefore refers to its response to comment ID WPC-PDA-053 3. Effects on farm businesses within the Order Limits have been assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], in terms of the effects on farm businesses from the cable route construction, there may be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes. 4. The Applicant has provided responses to comments raised by WPC on the potential impacts on the farm businesses. The Applicant therefore

ID	Theme	Comments/Issues Raised	Applicant's Response
		rights or alternative routing were considered; 6. Was Plot 06-008 included within any Agricultural Land Classification survey, soil survey or agricultural business assessment?; 7. How has the Applicant assessed the effect of the proposed rights on livestock grazing, field management and the ongoing viability of the agricultural holding?; and 8. How the Applicant has concluded that the proposed acquisition is proportionate in circumstances where a substantial area of actively farmed land would become subject to permanent restrictions.	refers to its response to comment ID WPC-PDA-053 5. The Applicant has considered the extent of rights required to deliver the cable works, including the potential for a reduced rights corridor, temporary rights and alternative routing. The Cable Route Corridor has been progressively refined during the development of the Scheme and has narrowed from the wider corridors considered at earlier stages. The current alignment and extent of the rights sought reflect the technical requirements for construction, installation, operation and maintenance of the cables, together with environmental and land use constraints. In this location, the southern alignment was considered preferable to other alignments due to potential effects on ecology and hedgerow. The current alignment also avoids the landowner's vineyard within the field. The Applicant is therefore satisfied that the rights sought are no wider than reasonably necessary to deliver the cable works and that the proposed Order Limits provide the necessary flexibility to construct and maintain the authorised development. The Applicant will continue to seek

ID	Theme	Comments/Issues Raised	Applicant's Response
			the rights required by voluntary agreement wherever possible. 6. Land within the Order Limits except the CRC has been subject to detailed ALC surveys, ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]. The CRC will be subject to soil surveys prior to construction as set out in the Outline Soil Resource and Management Plan [APP-204]. 7. The Applicant has provided responses to comments raised by WPC on the potential impacts on farming activities on the land. The Applicant therefore refers to its response to comments ID WPC-PDA-052 and WPC-PDA-053 8. The Applicant has provided responses to comments raised by WPC on the rights sought and restrictions on the land. The Applicant therefore refers to its response to comment ID WPC-PDA-054
WPC-PDA-059	Book of Reference	The current application documents do not provide sufficient plot-specific evidence to demonstrate why permanent rights are required across the entirety of Plot 06-008 or how the effects on the existing dairy and	The Applicant has provided a response to comments raised by WPC on the extent and need for permanent rights. The Applicant therefore refers to its response to comment ID WPC-PDA-054.

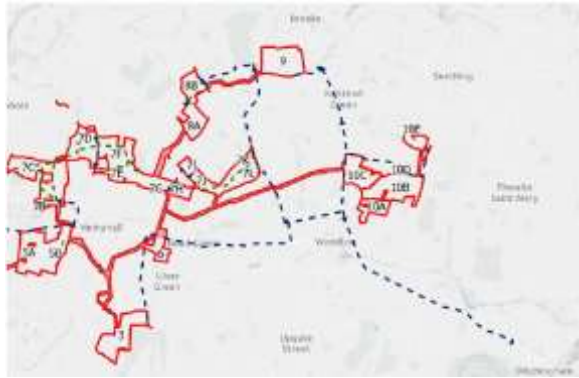
ID	Theme	Comments/Issues Raised	Applicant's Response
		visitor enterprise have been taken into account. This matter is directly relevant to the ExA's principal issues concerning: Community, health and wellbeing; Site selection, alternatives and design; and Soils and agricultural land.⁴²	
WPC-PDA-060	Transport and Access	Failure to assess Network Resilience and Community Accessibility for Woodton Village The Applicant's assessment of transport effects appears to focus primarily on traffic volumes, vehicle routing and community severance as defined through changes in traffic flows on individual road links. The assessment methodology adopts the Institute of Environmental Management and Assessment (IEMA) approach, which assesses severance principally through percentage changes in traffic levels.	The Applicant acknowledges the concerns raised regarding network resilience and community accessibility for Woodton Village. The matters raised within this representation are addressed in the Applicant's responses to WPC-PDA-061 to WPC-PDA-066, which consider the assessment of construction traffic on routes serving Woodton, the construction programme, traffic management measures and the maintenance of access during construction.

⁴² The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19-20. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		However, the submitted assessment does not appear to fully consider the resilience of the local road network serving Woodton village or the potential impacts arising from multiple simultaneous highway interventions.	
WPC-PDA-061	Transport and Access	The Transport and Access chapter identifies both the B1332 Norwich Road and the Shotesham Road/Woodton Road corridor as part of the transport study area. Norwich Road provides the principal route connecting Woodton with Norwich and key services to the north. Hempnall Road/B1527 provides the principal route connecting Woodton with Hempnall, Long Stratton and the wider South Norfolk road network. These roads are of particular importance because the alternative routes available to residents are primarily narrow rural lanes with limited capacity and limited suitability for accommodating diverted traffic.	The Applicant acknowledges the importance of the B1332 Norwich Road and Hempnall Road/B1527 in providing access between Woodton and key services within the wider area. The effects of construction traffic on these routes have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] .
WPC-PDA-062	Transport and Access	The Applicant's documents indicate that multiple roads in and around Woodton may be affected by construction accesses, cable route crossings, traffic management measures, street works or temporary	The Applicant acknowledges that the representation refers to the combined effect of multiple elements of the Scheme occurring at similar points within the construction programme, rather than the cumulative effects assessment

ID	Theme	Comments/Issues Raised	Applicant's Response
		restrictions, including Hempnall Road, Woodton Road, Shotesham Road, Baxter's Lane and other local roads within the village area. Whilst individual interventions may be acceptable when assessed separately, there does not appear to be a specific assessment of the cumulative effect of concurrent works affecting the limited number of routes available to Woodton residents.	reported within ES Volume 1, Chapter 11 – Transport and Access [APP-047], which considers the effects of the Scheme alongside other developments. The Applicant notes that construction activities are phased throughout the construction programme and do not all occur concurrently. Figure 2.1 of the Outline CTMP [APP-201] demonstrates that the various elements of the Scheme are staggered, with many activities completed over a period of months rather than throughout the full construction programme. The Environmental Statement assesses peak daily construction traffic flows as a worst-case scenario. In undertaking the traffic distribution exercise, construction traffic associated with all relevant elements of the Scheme using a particular route is combined. As such, the traffic flows assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] already assume that traffic associated with multiple parts of the Scheme is occurring simultaneously on the local highway network. The forecast traffic flows therefore represent a robust worst-case scenario, as they combine traffic associated with all relevant Scheme elements using that route. In practice, Figure 2.1 of the Outline CTMP [APP-201] demonstrates that construction activities are phased and staggered

ID	Theme	Comments/Issues Raised	Applicant's Response
			throughout the construction programme. As such, ES Volume 1, Chapter 11 – Transport and Access [APP-047] assesses a robust worst-case scenario in which traffic associated with multiple elements of the Scheme occurs simultaneously, whereas many of these activities would not actually occur concurrently in practice.
WPC-PDA-063	Transport and Access	In particular, the application documents do not appear to assess a scenario in which: - Norwich Road is subject to traffic management, restriction or delay; - Hempnall Road is simultaneously affected by construction activity; - alternative routes such as Woodton Road, Shotesham Road or Baxter's Lane are also affected by cable route works, crossings or associated traffic management; and - residents are required to rely upon a reduced number of available routes for access to employment, education, healthcare and other essential services. The assessment therefore appears to focus on traffic flow impacts rather than the wider issue of network resilience and the	The Applicant does not agree that practical accessibility has not been considered. The effects of construction traffic using the proposed construction vehicle routes were assessed within Section 11.8 of ES Volume 1, Chapter 11 – Transport and Access [APP-047], and mitigation measures have been developed to maintain access during construction. With regard to the potential for simultaneous construction activities, the Applicant refers to its response to WPC-PDA-062, which explains how the construction programme is phased and why the assessed traffic flows represent a robust worst-case scenario.

ID	Theme	Comments/Issues Raised	Applicant's Response
		practical accessibility of Woodton as a rural settlement.	
WPC-PDA-064	Transport and Access	 When looking at Woodton as a whole, the application proposes street works, traffic regulation measures, temporary restrictions and development access arrangements across multiple roads serving Woodton, including Woodton Road, Shotesham Road, Norwich Road (B1332), Seething Road and Harvey's Lane. Collectively, these routes form the principal highway connections between Woodton and Norwich.⁴³	The Applicant acknowledges the concerns raised regarding the combined effect of highway works within and around Woodton. As set out in response to WPC-PDA-062, the Applicant understands the representation to relate to the combined impact of multiple elements of the Scheme occurring during construction, rather than the cumulative effects assessment undertaken within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. The traffic flows assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] combine traffic associated with the various Scheme elements and therefore represent a robust worst-case assessment. The Applicant also notes that the construction programme is phased such that works affecting individual routes would not all occur simultaneously. Residents seeking an indication of when specific works are expected to occur should refer to the construction programme contained within the Outline CTMP [APP-201]. Where temporary restrictions are required, traffic management measures contained within the Outline CTMP [APP-201], including signed

⁴³ East Pye Solar, 7.6 Outline Construction Traffic Management Plan – Revision 1, March 2026: p. 43. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		The cumulative effect of these interventions has not been clearly presented from the perspective of Woodton residents. The application documents identify works on several separate plan sheets, making it difficult to understand how the local highway network would function as a whole during construction. Particular concern arises because Norwich is the principal regional centre for employment, secondary education, healthcare, rail services and other essential services used by Woodton residents. Where a project proposes interventions on multiple roads forming the principal outward connections from a rural settlement, the cumulative effect on day-to-day accessibility should be clearly assessed and explained.	diversions and temporary traffic management, would be implemented to maintain access and the operation of the local highway network.
WPC-PDA-065	Transport and Access	The Applicant should therefore demonstrate: • which routes between Woodton and Norwich would remain free from project related restrictions at any given time;	The Applicant considers that these matters have been addressed through ES Volume, Chapter 11 – Transport and Access [APP-047] and the Outline CTMP [APP-201] . As noted in response to WPC-PDA-064, the construction programme identifies when works are expected to occur and demonstrates that activities are phased throughout the construction period. Access to employment,

ID	Theme	Comments/Issues Raised	Applicant's Response
		- whether multiple routes could be affected simultaneously; - how access to education, employment, healthcare and other essential services would be maintained throughout construction; and - why the cumulative effect of the various highway interventions does not result in a significant accessibility impact for Woodton residents.	education, healthcare and other essential services would continue to be maintained throughout construction, with traffic management measures implemented where required. The Applicant also notes that the traffic flows assessed within ES Volume, Chapter 11 – Transport and Access [APP-047] combine traffic associated with multiple elements of the Scheme and therefore represent a robust worst-case assessment of potential traffic impacts.
WPC-PDA-066	Transport and Access	The Examining Authority may wish to seek further clarification from the Applicant regarding: - Whether a network resilience assessment has been undertaken for Woodton and other villages with limited highway connections. - Whether the cumulative effects of simultaneous works on principal and alternative routes have been assessed. - What commitments exist to prevent concurrent restrictions on Norwich Road, Hempnall Road and	The Applicant notes the matters raised for clarification. ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177] have been undertaken in accordance with recognised industry guidance, including the ISEP Guidelines for Environmental Assessment of Traffic and Movement. As explained in response to WPC-PDA-062, the assessed traffic flows represent a robust worst-case scenario incorporating traffic associated with multiple elements of the Scheme. Access for residents, businesses, service providers and emergency vehicles would be maintained throughout construction through the

ID	Theme	Comments/Issues Raised	Applicant's Response
		alternative routes serving the village. 4. How reasonable access for residents, businesses, service providers and emergency vehicles will be maintained throughout construction. 5. Whether a village-specific traffic management strategy should be secured to ensure the continued accessibility of Woodton during the construction phase.	implementation of the final Construction Traffic Management Plan, which is secured through the DCO requirements. The final Construction Traffic Management Plan would provide further detail regarding the management of construction traffic on routes serving Woodton.
WPC-PDA-067	Transport and Access	Without such assessment, it is unclear whether the Applicant has adequately considered the potential for functional severance arising not from increases in traffic flows, but from the temporary reduction in route choice and network resilience available to residents. The submitted documents therefore appear to leave an evidential gap in relation to the continued accessibility of Woodton during construction.	The Applicant acknowledges the concerns raised regarding network resilience and accessibility. The matters raised within this representation are addressed in the Applicant's responses to WPC-PDA-061 to WPC-PDA-066. The Applicant does not agree that there is an evidential gap regarding accessibility during construction. ES Volume 1, Chapter 11 – Transport and Access [APP-047] and the Outline CTMP [APP-201] assess and manage the effects of construction traffic through a robust worst-case approach, a phased construction programme and the implementation of appropriate traffic management measures.

ID	Theme	Comments/Issues Raised	Applicant's Response
		This matter is directly relevant to the ExA's principal issues concerning: Cumulative effects; and Traffic and transport. ⁴⁴	
m	Book of Reference	Failure to identify Albion Nights as a Category 3 Person The owner of Albion Nights, an established tourism and hospitality business operating from a rural off-grid accommodation site adjacent to the proposed cable corridor and opposite Site 10, submitted a detailed consultation representation explaining the potential impacts of the Scheme upon the business. The representation identified concerns relating to construction noise, construction traffic, impacts on surrounding walking routes, visitor experience, business reputation, occupancy levels and economic viability. The unique selling points of these cabins are that they are "off-grid" experiences without wifi or plug sockets, allowing visitors to enjoy a get away from modern life in a near silent environment.	Applicant confirms that Albion Nights was considered as part of the land referencing exercise undertaken in preparing the Book of Reference [APP-022]. Category 3 comprises persons who the Applicant considers would or might be entitled to make a relevant compensation claim if the DCO is made and fully implemented. The relevant claims are those under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 and section 152(3) of the Planning Act 2008. In assessing whether Albion Nights should be identified as a Category 3 interest, the Applicant considered the potential effects of the Scheme on the property and whether these could give rise to a relevant compensation claim. This included consideration of the relevant technical assessments supporting the DCO application. As part of the assessment, noise, vibration and glint and glare assessments were undertaken. The

⁴⁴ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19-20. [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
		  	Noise and Vibration Assessment (presented in ES Volume 2, Figure 12.2 Noise and Vibration Sensitive Receptors [APP-099]) did not identify Albion Nights as an impacted receptor. The Glint and Glare Assessment (presented in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment Part 1 [AS-025]) similarly did not identify any impact as the solar panels would not be visible from the receptor. The Applicant also acknowledges the concerns raised regarding construction traffic on Norwich Road. The effects of construction traffic on this route were assessed within Environmental Statement Volume 1, Chapter 11 – Transport and Access [APP-047] using the methodology set out within the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement. The assessment concluded that the resulting effects would be negligible and not significant. Impacts of the Scheme on local tourism assets were assessed in ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. No significant effects were identified. The Applicant does not therefore consider that the Scheme would make

⁴⁵ Abion Nights (no date) Albion Nights, <https://www.albionnights.co.uk/>. Accessed on 28.08.2026. [Reference by Woodton Parish Council].

⁴⁶ East Pye Solar, 2.2 Land Plan – Revision 1, March 2026: p. 2 [Reference by Woodton Parish Council].

ID	Theme	Comments/Issues Raised	Applicant's Response
			the area unattractive to visitors. Having considered the information available following diligent inquiry and the applicable statutory compensation provisions, the Applicant did not identify circumstances indicating that the owner of Albion Nights would or might be entitled to make a relevant claim. Albion Nights has therefore not been included as a Category 3 interest in Part 2 of the Book of Reference [APP-022]. The Applicant also refers to the response WPC-PDA-069 in this document.
WPC-PDA-069	Consultation and Engagement	Their response in consultation was as follows: ““I object to the East Pye Solar proposal. I am extremely concerned about the impact this scheme would have scheme on my award-winning business (Redacted). To give some context, (Redacted) operates within a rural setting where tranquillity, dark skies and uninterrupted access to the countryside are key elements to my guests' experience. Guests stay here to enjoy peaceful, off-grid stays, to escape the noise and hub-bub of city life, and to experience unplugged time, without wifi and screens. (Redacted) has been	The Applicant acknowledges the concerns raised by the proprietor of Albion Nights regarding the potential effects of the Scheme on the business. The Applicant notes that the matters raised by Albion Nights in relation to the visual impact to the surrounding landscape, does not constitute a relevant compensation claim for the purposes of section 57 of the Planning Act 2008. The Government's guidance confirms that depreciation attributable to other factors, including loss of a view, is not compensable under this regime. The Applicant nevertheless recognises that the concerns raised by the proprietor are relevant to the assessment of the Scheme and these matters have been considered through the relevant environmental assessments and, where appropriate, mitigation measures.

ID	Theme	Comments/Issues Raised	Applicant's Response
		featured on BBC 1, Channel 4's George Clarke's Amazing Spaces and in The Guardian (10 of the Best Cosy Cabin Holidays in the UK), The Times (24 of the UK's Most Magical Cabin Stays), plus Simple Things, Elle and Grazia have all run features. During the construction phase, it is highly likely there will be sustained noise from heavy machinery, large vehicles, piling and groundworks. This noise fundamentally undermines everything offered to my guests. Even temporary works have the potential to cause poor reviews and to create long-term damage. I have worked extremely hard to create an excellent reputation as customer perception is crucial in this industry. Repeat bookings and word-of-mouth recommendations are vital for small tourism businesses such as mine. In addition to these noise impacts, the proximity to an established walking route around Site 10, threatens to disrupt, if not entirely loose, an added draw for visitors choosing to stay here. Many guests stay specifically for access to countryside walks. Construction traffic, temporary road restrictions and visual intrusions from works compounds, etc will have a hugely	The Applicant notes that no Public Rights of Way (PRoW) are proposed to be permanently closed as a result of the Scheme. Where temporary closures are required during the construction phase, suitable diversion routes would be provided in accordance with the Outline PRoWPPMP [APP-203], maintaining public access throughout the construction period. In addition, the Scheme would provide three new permissive paths, resulting in enhanced access and connectivity to the local countryside. The assessment of construction and operational noise and vibration is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The nearest noise sensitive receptor to Albion Nights considered within the assessment is NSR77 (Dwellings on Norwich Road). In relation to construction noise, during solar PV piling, NSR77 is anticipated to experience a low impact, which results in a short term minor significance of effect. In relation to operational noise, ES Volume 2, Appendix 12.2 - Noise Modelling and Calculations [APP-198] provides the detailed outcomes of the assessment during the daytime, night-time and early morning periods. During these times, the rating level is expected to be below the background sound level, which results in a

ID	Theme	Comments/Issues Raised	Applicant's Response
		negative impact on my guests. There is, of course, also the wider implication of economic impact, with reduced occupancy rates, loss of income and a lack of confidence in the area as a tourism destination. The long term industrialisation of the landscape will inevitably deter visitors and tourists from coming to this part of South Norfolk, and this will surely impact on my other businesses such as mine.”⁴⁷ Despite these concerns, the business proprietor does not appear to have been included within Part 2 of the Book of Reference as a Category 3 person and no substantive response to the representation provided in consultation appears to be recorded.	negligible impact. The Evening Noise Assessment [EN0110114/EXAM/9.20] provides the detailed outcomes of the assessment during the evening period. During this period, the rating level is expected to be below the background sound level, which results in a negligible impact. Overall, this translates into a negligible significance of effect, which is not significant.
WPC-PDA-070	Book of Reference Consultation and Engagement	The consultation response submitted by the owner of Albion Nights raises concerns that go beyond generalised opposition to the Scheme. The representation identifies a business whose commercial model is founded upon:	The Applicant has provided a response to comments raised by WPC on category 3 interests. The Applicant therefore refers to its response to comment ID WPC-PDA-069. The Applicant acknowledges the concerns raised regarding the potential effects of the Scheme on Albion Nights and its business operations.

⁴⁷ Representation from consultation feedback, <https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN0110014/representations/100023562>. Accessed on 28.08.2026.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• tranquillity and rural character; • dark skies and an undeveloped landscape setting; • access to surrounding countryside and walking routes; • the absence of modern technological intrusion; and • visitor experiences specifically linked to the character of the local environment. The proprietor's evidence indicates that the business is located in proximity to the CRC proposed development infrastructure and opposite Site 10, placing it in very close proximity to construction activities and long-term operational development. Concerns were raised regarding noise from plant and machinery, heavy vehicle movements, visual changes to the landscape and disruption to recreational routes used by guests. These concerns directly relate to potential business loss and economic harm arising from implementation of the Scheme. The representation expressly refers to reduced bookings, loss of income, reputational	However, Site 10 is not considered within a remote or wild landscape devoid of existing infrastructure or technological influences due to its proximity from B1332 corridor and existing agricultural land use. Albion Nights is located to the west of Site 10, beyond the B1332 and the woodland block known as The Grange. ES Volume 2, Figure 7.5.2 - Site 10 ZTV [APP-071] indicates some potential visibility of the Scheme based on the DTM, but little to no visibility when the DSM is considered. Therefore, it is considered unlikely that the Scheme would be visible from Albion Nights or materially affect its tranquillity. The Scheme is likely to have an effect on the surrounding PRow network. A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], including the assessment of construction phase effect. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149]. A Green Infrastructure Strategy [AS-005] has been developed which includes 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
		damage and diminished attractiveness of the area as a visitor destination.	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]. The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213]. As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040], lighting is not required within the Solar PV Arrays during the operational phase. Lighting has been designed to be directional, downward-facing and controlled to minimise light spill, in accordance with the Institution of Lighting Professionals (ILP) guidance, as set out in the ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151].
WPC-PDA-071	Book of Reference	Given that the threshold for Category 3 inclusion is whether a person "would or might" be capable of making a relevant claim, it is unclear why a tourism business owner alleging direct economic and	The Applicant acknowledges the concerns raised regarding the potential effects of the Scheme. Category 3 is a specific statutory classification under section 57 of the Planning Act 2008. Category 3 persons are those whom the Applicant

ID	Theme	Comments/Issues Raised	Applicant's Response
		amenity impacts arising from immediately adjacent development was not identified as a potential Category 3 person. The Applicant's consultation material records numerous consultation responses and explanations of how comments have been considered. However, no explanation appears to have been provided regarding: • whether Albion Nights was assessed as a potential Category 3 interest; • whether the proprietor was considered capable of making a relevant claim; • the reasons for excluding the business from Part 2 of the Book of Reference; or • how the Applicant concluded that the identified commercial impacts did not warrant Category 3 consideration.	considers might be entitled to make a "relevant claim" for compensation if the DCO is made and fully implemented. The relevant claims are those under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 and section 152(3) of the Planning Act 2008. The assessment of whether an interest is considered a Category 3 interest is based on the potential impact of the project and not solely the distance to the project. The exclusion of an interest from Category 3 does not preclude that interest from making a compensation claim under the relevant legislation should they believe they have a valid claim. Category 3 status is a classification for the purposes of the DCO application and reflects the Applicant's assessment, based on the information available following diligent inquiry, of whether a person might be entitled to make one of the relevant claims identified in section 57. Any entitlement to compensation would ultimately depend upon the relevant statutory provisions and the circumstances of the individual case.
WPC-PDA-072	Land Referencing	The omission raises concerns regarding the adequacy of the Applicant's diligent inquiry and land-referencing exercise. Where a business located immediately adjacent to the proposed development identifies specific concerns regarding loss	The Applicant has provided a response to comments raised by WPC on category 3 interests. The Applicant therefore refers to its response to comment ID WPC-PDA-071.

ID	Theme	Comments/Issues Raised	Applicant's Response
		of amenity, reduced visitor demand and consequential economic harm, it would be reasonable to expect the Applicant to demonstrate how that business was assessed against the Category 3 criteria. Without such explanation, it is difficult to understand how the Applicant satisfied itself that all persons who "would or might" be capable of making a relevant claim were identified and recorded.	
WPC-PDA-073	Book of Reference	The Examining Authority is requested to require the Applicant to: • Confirm whether the owner of Albion Nights was assessed as part of the Category 3 identification process. • Explain whether the consultation representation concerning business impacts was considered during the land-referencing exercise. • Set out the reasons why the proprietor was not included within Part 2 of the Book of Reference. • Demonstrate how the Applicant's diligent inquiry exercise adequately identified all persons who "would or might" be capable of making a relevant claim arising from	The Applicant has provided a response to comments raised by WPC on category 3 interests. The Applicant therefore refers to its response to comment ID WPC-PDA-071.

ID	Theme	Comments/Issues Raised	Applicant's Response
		construction and operation of the Scheme. This matter is directly relevant to the ExA's principal issues concerning: Noise and vibration; and Community, health and well being.⁴⁸	
WPC-PDA-074	Appendix	<i>Applicant Note:</i> Woodton Parish Council included an appendix setting out seven locations it considers would assist the Examining Authority as part of any future site inspection programme, covering transport and access, community severance, agricultural operations, heritage setting, aviation activity and compulsory acquisition matters.	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.

⁴⁸ The Planning Inspectorate (2026) Rule 6 Letter – Notification of the Preliminary Meeting and matters to be discussed, [https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20\(1%20part%20PM\)%20%20February%202025.pdf](https://nsip-documents.planninginspectorate.gov.uk/publisheddocuments/EN0110014-000406-XPE02a%20-%20Rule%206%20letter%20(1%20part%20PM)%20%20February%202025.pdf). P. 19. [Reference by Woodton Parish Council].

4 The Applicant's Response to Procedural Deadline A Submissions Submitted by Members of the Public

Table 4.1 Aleksei Pashchenko [\[PDA-076\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
AP-PDA-001	Alternatives	I strongly oppose this application and make the following submissions on how the examination should be conducted. The recent shifts in energy policy and political direction make rigorous examination of this proposal even more essential than before. The government under the new Prime Minister has adopted a far more pragmatic stance on domestic oil and gas, and it has recognised that Britain will continue to need these fuels for years to come. Nuclear power also continues to receive strong government support through life extensions, small modular reactors, and regulatory reform. Furthermore, [REDACTED] departure from the Energy brief further signals that the previous hardline prioritisation of intermittent renewables is no longer unchallenged.	The Applicant notes this comment and has provided further information below.

ID	Theme	Comments/Issues Raised	Applicant's Response
		In this evolving context, the Examining Authority must not treat large-scale solar projects on agricultural land as automatically justified "nationally important infrastructure." The examination must prioritise the following:	
AP-PDA-002	Alternatives	4. Necessity and alternatives in light of changing national policy Substantial weight must be given to genuine alternatives that deliver far firmer, more reliable, and dispatchable power, such as accelerated domestic oil and gas production from existing North Sea fields and a rapid expansion of nuclear. All claims that this solar project is required for energy security must also be properly tested against the government's own emerging recognition that oil, gas, and nuclear remain essential.	The Statement of Need [APP-206] provides evidence in relation to the capacities of main categories of renewable energy generation technologies tasked to support the delivery of a low carbon and secure electricity system. While the need for unprecedented capacity growth is urgent, some technologies (e.g. Carbon Capture Usage and Storage (CCUS), hydrogen or nuclear) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in NPS EN-1). The Applicant notes that burning oil or gas releases greenhouse gasses, which must be captured by CCUS to avoid further harm to the global climate. Further information on these longer-delivery technologies is included in Sections 5.6 to 5.8 of the Statement of Need [APP-206]. Yet, to address the ongoing climate emergency, it is critical that the UK urgently develops a large

ID	Theme	Comments/Issues Raised	Applicant's Response
			capacity of low carbon generation while continuing to deliver on longer-term developments, noting that these are needed as well as, rather than instead of, schemes which use technologies which are already proven in delivery. Solar is a proven technology, and the Statement of Need [APP-206] provides evidence of the substantial benefits brought forward by large-scale ground mounted solar electricity generation generally. The Scheme is a viable proposal to use proven technology with short development timescales, thereby delivering dependable decarbonisation benefits. The Applicant agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets. The Applicant, however, is a solar and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme.
AP-PDA-003	Soils and Agricultural Land	1. Agricultural land and food security Permanent loss of productive farmland in Norfolk must be rigorously assessed as this is greenfield agricultural land, not brownfield or previously developed land. The prioritisation of large-scale solar arrays on such farmland is also difficult to	NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV quality land and that land type should be a predominating factor in determining the suitability of the site selection. NPS EN-3 recognises that, at scale, developments may use some agricultural land.

ID	Theme	Comments/Issues Raised	Applicant's Response
		reconcile with the national interest in domestic food production, especially when more reliable domestic energy options exist that do not require industrialising the countryside.	At Paragraph 2.10.21, NPS EN-3 states that: <i>"While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible."</i> ALC was an important factor for the Applicant in site selection. Land within the Order Limits was identified as likely to be some of the lowest quality land relative to the wider area based on Natural England's 'Predictive Likelihood of BMV' mapping. 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 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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].
AP-PDA-004	The Applicant Funding Statement	2. Ownership and general value for money Full transparency is absolutely required on the corporate chain (East Pye Solar Ltd to Macquarie Asset Management funds) and the projected cost to UK billpayers through Contracts for Difference and other	The Applicant acknowledges the comment and 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
		subsidies. Ultimately, British consumers should not be funding returns to these overseas investors for intermittent energy projects when a variety of domestic alternatives are available.	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. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			infrastructure schemes and helps fund the transition to clean energy at the scale required.
AP-PDA-005	Funding Statement Need	3. System costs, reliability, and grid stability The examination must assess intermittency, backup requirements, and whole-system costs. Recent European experiences have highlighted the genuine risks that come with over-reliance on weather dependent generation. This must be taken into account.	Paragraphs 3.2.8 to 3.2.10 of NPS EN-1 state that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established. Paragraphs 4.2.16 – 4.2.17 of the energy NPSs 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, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve net zero. Chapter 8 of the Statement of Need [APP-206] describes the contribution of solar to electricity system security, and how storage assets can support solar schemes to operate flexibly and efficiently by helping to balance supply with

ID	Theme	Comments/Issues Raised	Applicant's Response
			demand, and reducing the need for back up supplies.
AP-PDA-006	DCO Process	4. Timetable and process Given the potential for large-scale irreversible harm and the shifting national energy context, the timetable must allow sufficient time for full written representations, independent evidence on the costs and all alternatives, comprehensive site inspections, and proper consideration of the cumulative impacts with other solar and battery schemes in Norfolk.	The Applicant notes this comment. The Examining Authority published the examination timetable in the Rule 8 letter [PD-007] on 23 September 2026.
AP-PDA-007	Need	This proposal seriously risks forcing the UK down a long path of expensive and intermittent energy generation at precisely the moment when our national policy is beginning to re-emphasise energy security, domestic resources, and genuine reliability. The examination must properly test whether East Pye Solar truly serves the national interest or merely continues a failed approach. I will attend the preliminary meeting as an observer.	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 "<i>a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i>" (NPS EN-1 (2025) Para 3.3.23). This is because "<i>Solar farms can be built quickly</i>" (NPS EN-3 (2025) Para 2.10.6) so are well placed to meet the urgent need identified in NPS EN-1.

ID	Theme	Comments/Issues Raised	Applicant's Response
			<i>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).</i> 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 security, and affordability benefits that they deliver. The UK has adequate irradiance levels for solar generation. A map of PV power potential in the UK is presented in the Statement of Need [APP-206]. The Scheme is located in an area with solar irradiance levels above average for the UK. The Scheme is being designed to maximise use of its 500MW grid connection, either directly from the solar panels, or from energy stored in the BESS and discharged to the grid when it is needed. Home-grown solar energy is reliable and energy yields are readily forecastable. The inclusion of a BESS will support the Scheme in its operation to store electricity if it is generated in abundance and export it to the grid when it is needed more.

Table 4.2 Andrea Snowden [\[PDA-050\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
AS-PDA-001	Landscape and Visual	I have been a resident in Great Mouton for 30 years and seen and accepted changes to this sleepy South Norfolk haven for wildlife and peaceful countryside. However, the proposal by East Pye to decimate the village is something I find impossible to accept. Should this proposal go ahead the whole of the south side of the village (where I live) will be industrialised with 4.5m tracker panels, battery storage and 3 substations.	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] presents an assessment of the likely significant effects of the BESS, Project Substations and the National Grid Substation. The Green Infrastructure Strategy [AS-005] seeks to retain and enhance existing vegetation, where possible, to aid the integration of the Scheme within the environment and respond to the prevailing character as far as practicable. New woodland belts and native tree planting provide screening to the Scheme as well as improves biodiversity and supports green infrastructure connectivity. Hedgerow reinforcement as detailed in the Outline LEMP [APP-199] (which is a secured document) is proposed along existing features to restore these and aid visual screening, together with new hedgerow creation along the existing PRoW. Collectively these proposed measures aim to reinforce existing vegetation across the landscape. The Design Principles, Parameters and Commitments [APP-213] includes a commitment for the BESS, National Grid Substation and

ID	Theme	Comments/Issues Raised	Applicant's Response
			Project Substations, that whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Further the Design Principles, Parameters and Commitments [APP-213] includes a minimum set back of this infrastructure from the PRoW. The design commitments specific to the landscape and visual impact of the security installations are set out and secured through the Design Principles, Parameters and Commitments [APP-213], and include: maximum heights of 2.5m for perimeter fencing and 3m for palisade fencing, setting maximum; Pole-mounted, internal-facing CCTV cameras on galvanised steel poles, with a maximum height of 3m, using night vision technology to avoid the need for nighttime lighting of the Solar PV Site; Colours and external finishes for fencing and CCTV to be in keeping with the prevailing surrounding environment, carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape, with final details to be approved by the relevant planning authority; and wherever practicable, use of existing gaps in hedgerows to route fencing, together with the commitment to retain and

ID	Theme	Comments/Issues Raised	Applicant's Response
			enhance existing vegetation and features of value to aid integration of the Scheme within the environment.
AS-PDA-002	PRoWs and Recreation	This will totally cut off the south side of the village from the rest of the community. We will be unable to use the network of footpaths for walking, enjoying the natural world and rebalancing our mental health. The local network of country lanes will be unavailable for us to cycle and walk,	A 15m buffer to PRoW has been incorporated into the design of the Scheme, as secured through the Design Principles, Parameters and Commitments [APP-213]. The Applicant is also committed to the provision of new permissive paths and community accessible space, as set out in the Design Principles, Parameters and Commitments [APP-213] and Outline LEMP [APP-199] (which is a secured document) which will provide opportunities for access and recreation. These measures will provide additional opportunities for access and recreation during the operational phase of the Scheme. 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	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges the importance of the local PRow network for both recreation and connectivity. Where temporary impacts on PRowS are required during construction, appropriate management and mitigation measures are proposed, including signage, alternative routes where necessary, traffic marshal support, reduced vehicle speeds in areas where construction traffic interacts with PRow users, and advance notification of closures. No permanent closures of PRowS are proposed as part of the Scheme. Any PRowS temporarily affected during construction will be reinstated and reopened following completion of the relevant works. The assessment adopts a reasonable worst case scenario, assuming all construction activities occur simultaneously. In practice, construction activities will be staggered across the programme, reducing the extend of concurrent effects on the PRow network. The assessment concludes that, with the proposed mitigation in place, effects on PRow users would not be significant.

ID	Theme	Comments/Issues Raised	Applicant's Response
AS-PDA-003	Noise and Vibration Air Quality	and our homes will be consumed by noise, dust and disruption for years and years to come.	<u>Air Quality</u> ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180] presents the construction dust risk assessment and an assessment from traffic on air quality from construction and decommissioning is presented in ES Volume 1, Chapter 13 – Air Quality [APP-049]. No significant effects on air quality are identified in ES Volume 1, Chapter 13 – Air Quality [APP-049]. Mitigation and control measures for dust and vehicle emissions are provided in the Outline CEMP [APP-196] and Outline OEMP [APP-197]. In accordance with Requirements 13 and 14 of the Draft DCO [AS-032], detailed CEMP and OEMP will be submitted to and approved by the relevant planning authority. <u>Noise and Vibration</u> 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-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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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.
AS-PDA-004	Decommissioning	As I understand the substations will never be decommissioned, so what future is there for the young people living and wanting to stay in the village. Our children's lives will be blighted as ours will have been, and Great Mouton will no	The Applicant refers to its response to BEPS-PDA-002 in Table 2.1 of this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		longer be the quiet agricultural village we all moved here to enjoy.	
AS-PDA-005	Human Health Soils and Agriculture	I implore you to walk in our shoes whilst you consider this application, the health, safety, emotional well-being, financial stability, food security will all be negatively impacted beyond recognition,	Human health has been assessed in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] which considers human health in relation to transport and access, noise, air quality, PRoWs, socio-economics, and landscape and visual effects. Mental health has also been considered, as presented in the Equality Impact Assessment [APP-214]. The Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197], Outline OTMP [APP-202], Outline LEMP [APP-199], Outline PRoWPPMP [APP-203] and Outline ESSC [APP-205] outline measures taken 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]. With specific regard to community liaison, this is directly secured through Requirement 4 of the Draft DCO [AS-032] through the provision of a community liaison group. This group will act as an intermediary between the public and the

ID	Theme	Comments/Issues Raised	Applicant's Response
			construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
AS-PDA-006	Ecology and Biodiversity Water Environment	not to mention the disastrous impact on nature, risk to water sources and our environment as a whole.	<u>Ecology and Biodiversity</u> 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, reduce, mitigate or compensate for, through 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 PSMS [APP-161]. <u>Water environment</u>

ID	Theme	Comments/Issues Raised	Applicant's Response
			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-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].

Table 4.3 Beverley Price [\[PDA-067\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
BP-PDA-001	General Remarks	I understand that there are meetings scheduled at which residents ,directly affected by the East Pye Solar development, may voice their concerns.	The Applicant notes this comment.
BP-PDA-002	Consultation and Engagement	I have submitted several emails regarding the extremely negative impact that this project has had on my home, my stress levels and my family	The Applicant remains committed to engaging constructively with affected Interested Parties and ensuring that all responses are appropriately considered as part of the examination process.
BP-PDA-003	Ecology and Biodiversity Transport and Access	- not to mention the negative impacts on the local wildlife, footpath and village at large.	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BAPC-003, HePC-007, SPC-010, SPC-066, and BAPC-003. The Applicant acknowledges the concerns raised regarding the impact of the Scheme on public rights of way. The effects of the Scheme on Public Rights of Way have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047], and measures relating to the management of Public Rights of Way and permissive paths during construction and operation are set out within the Outline Public Rights of

ID	Theme	Comments/Issues Raised	Applicant's Response
			Way and Permissive Paths Management Plan [APP-203].
BP-PDA-004	Consultation and Engagement	As information has be somewhat limited regarding the complaint process please confirm that you have received my concerns and acknowledge them.	The Applicant continues to provide information to Interested Parties and stakeholders through its communication channels (email, freepost and freephone number), which remains open and managed. The Applicant remains committed to engaging with stakeholders and responding to any concerns they may have about the Scheme.
BP-PDA-005	General Remarks	Unfortunately, I am out of the country during the scheduled meeting but wish my distress to be clearly noted and I wish to be considered for special consideration should this abomination be approved!	The Applicant notes this comment.
BP-PDA-006	Socioeconomics	Our lives and our future has been scuppered by these proposals and we are feeling it in a very real, visible and financial way with apparently little 'comeback or appreciation .	The Applicant notes these concerns. In relation to property value and the potential impact of the Scheme on the local economy and local businesses, the Applicant refers to its responses at SOC-001 and SOC-002 as set out in Part 5 – Thematic Response to Relevant Representations [PDA-012].
BP-PDA-007	Battery Safety	We are concerned about the safety and peace of our home which we have worked and sacrificed so hard for. We are worried	The Outline BSMP [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible

ID	Theme	Comments/Issues Raised	Applicant's Response
		about the noise & very real fire risk given the close proximity to our home and garden.	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. The assessment of 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-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].
BP-PDA-008	Human Health	My elderly Father in Law who lives with us and is very ill deserves peace in his later years and that's what we thought we were offering him , when he came to live in the Annex at our rural property! To say we are all stressed and devastated is an understatement.	The Applicant acknowledges the concerns raised regarding the potential effects of the Scheme on the wellbeing of local residents, including older people and those with existing health conditions. Potential health effects have been assessed in the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], including effects related to air quality, access to recreation, visual change, disturbance and wellbeing. The Human Health Summary Statement identifies older people and people with existing health conditions as groups that may have increased

ID	Theme	Comments/Issues Raised	Applicant's Response
			sensitivity to particular changes. Those sensitivities were taken into account when considering the relevant health pathways. On the basis of the assessed magnitude, duration and geographic extent of those changes, together with the secured mitigation, the Human Health Summary Statement does not identify a likely significant population-level health effect. The Mental Health and Wellbeing Addendum [EN0110014/EXAM/9.27] prepared by the Applicant, provides further consideration of the evidence and representations submitted during the Examination in relation to potential mental health and wellbeing effects. Having reviewed this additional information, the Addendum does not alter the overall conclusions of the Human Health Summary Statement. This conclusion does not seek to discount the concern or distress reported by individual residents.
BP-PDA-009	Consultation and Engagement	Please let me know how our voice will be heard and our very real losses allayed?	The Applicant reiterates its commitment to engaging constructively with Interested Parties throughout and beyond the examination process. There are also further opportunities to submit written representations throughout the examination.

Table 4.4 Carina Powney [PDA-073]

ID	Theme	Comments/Issues Raised	Applicant's Response
CP-PDA-001	DCO Process	The preliminary hearings are, in my view not inclusive and because of the times i.e held within normal working hours effectively exclude people, like myself and my partner who work, working families, people who need to care for young children and elderly relatives. Timings should be varied to include evenings and weekends so that everyone who wishes to can be involved. As, not all, but most people who look after young children are women, I would question whether access to these meetings truly meets equality legal requirements. My partner has a business and to close it to attend the hearings would cause damage to her business and cause the loss of a significant amount of money.	The Applicant notes the concerns regarding the Examination timetable and the resources available. The setting of the Examination timetable is a matter for the Examining Authority.
CP-PDA-002	Water Environment	I also have concerns that the application did not include a complete flood risk assessment- our home was flooded in 2020 as was The Street in Saxlingham Nethergate- this has not been mentioned in the assessment and is extremely important because transformer lorries	The Applicant notes this comment in relation to concerns on flood risk to The Street, Hempnall. Figure 9.2 – Topography and Overland Flow Routes contained within Appendix A of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] shows that whilst Sub-Sites 7E, 7F and 7G

ID	Theme	Comments/Issues Raised	Applicant's Response
		would be going past our home. If it rains there is a good chance they will push the water up and put us in a flood situation.	are located north/north-east of The Street, the topographic contours fall towards the north or east and therefore do not contribute overland flows towards Hempnall or The Street. The figure also shows that the land between Sub-Sites 7E-7G and Hempnall/The Street are very steep (level change of 45.0m AOD north to 29.0m AOD on The Street) and therefore if flooding issues are occurring due to overland flows from the fields, it would be from fields outside of the Order Limits. Notwithstanding the above, the proposed use for the Sub-Sites adjacent to Hempnall will be solar panels which are located outside of areas of Flood Zones 2 and 3, and outside of areas of higher surface water flood risk as far as reasonably practicable, as set out in Section 8 of ES Volume 3, Appendix 9.1- Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213]. The ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in Outline LEMP [APP-199]. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown that grass cover has a

ID	Theme	Comments/Issues Raised	Applicant's Response
			higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. Therefore, the Scheme is not anticipated to exacerbate flooding to Hempnall/The Street.

Table 4.5 Christopher Humphrey[\[PDA-070\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
CH-PDA-001	Opening remarks	I wish to comment on the draft Examination Timetable and also place on record an outstanding matter concerning my potential Category 3 status.	The Applicant notes this comment.
CH-PDA-002	Examination process	Due to work commitments, I may not be able to attend the Preliminary Meeting or the initial Open Floor Hearings in person. I nevertheless intend to participate fully in the examination through written submissions and would ask that sufficient opportunity is provided for Interested Parties who are unable to attend hearings to make written representations as the examination progresses.	The Applicant notes the concerns regarding the Examination timetable and the resources available. The setting of the Examination timetable is a matter for the Examining Authority.
CH-PDA-003	Book of Reference	I also wish to draw the Examining Authority's attention to an outstanding matter concerning my property, Clay Cottage, Fritton ().	The Applicant notes the Respondent's request to be identified as a Category 3 interest. In preparing the Book of Reference [APP-022] , the Applicant undertook a detailed assessment of all land interests that may be affected by the Scheme, drawing on land referencing investigations, environmental assessments and other relevant project information. This assessment was carried out in accordance with the requirements of the Planning Act 2008.

ID	Theme	Comments/Issues Raised	Applicant's Response
			On the basis of that assessment, the Applicant concluded that the Respondent does not meet the statutory definition of a Category 3 person. Accordingly, the Respondent has not been included within the Book of Reference [APP-022] as a Category 3 party. The Applicant remains satisfied that the Book of Reference [APP-022] has been prepared appropriately and accurately identifies those persons who, based on the evidence available, meet the relevant statutory criteria.
CH-PDA-004	Book of Reference	I have formally requested that East Pye Solar identify my property as a Category 3 person in relation to potential compensation arising from the proposed development. Following a visit from the applicant's representatives, I was advised that this would be checked with their land referencing advisers, Dalcour Maclaren. I subsequently made a formal written request for confirmation, but have received no substantive response.	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 CH-PDA-003.
CH-PDA-005	Book of Reference	My property is approximately 175 metres from the proposed solar PV array and 320 metres from the proposed 400kV substation. Both the proposed solar development and substation are at a	The Applicant acknowledges the Respondent's concerns regarding proximity, elevation and identified visual effects. A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-

ID	Theme	Comments/Issues Raised	Applicant's Response
		higher elevation than my property, and the PEIR identifies significant visual effects in relation to my property.	043] Based on the Applicant's measurements, the nearest solar PV arrays would be approximately 175m from the property, whilst the nearest 400kV substation infrastructure would be approximately 450m away. The property is separated from the nearest solar infrastructure by a retained agricultural field, maintaining a physical buffer between the residence and the operational components of the Scheme. 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 Scheme includes a proposed linear tree belt between the property and the adjacent solar PV arrays, together with the retention and enhancement of existing hedgerows and other vegetation. Additional vegetation intervenes between the property and the proposed 400kV substation, further filtering views and reducing visual influence over time as mitigation matures. The Applicant's LVIA identifies significant visual effects at VL5/Site 5 during construction and the early operational Year 1. However, the establishment of proposed landscape mitigation

ID	Theme	Comments/Issues Raised	Applicant's Response
			would reduce the magnitude of visual effects over time, such that effects are no longer significant by Year 15. The assessment therefore recognises the initial visual change experienced by receptors whilst also considering the longer-term influence of embedded mitigation. 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]. 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.
CH-PDA-006	Book of Reference	I appreciate that the Examining Authority is not responsible for determining individual compensation claims. However, I ask that this matter is noted as part of the examination record and that the applicant's	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		approach to identifying potentially compensatable interests is properly addressed, including whether my property has been considered for inclusion in the Book of Reference and, if not, the basis for its exclusion.	
CH-PDA-007	Book of Reference	I would also be grateful for confirmation of the appropriate opportunity during the examination for me to make further representations on this matter.	The setting of the Examination timetable is a matter for the Examining Authority.

Table 4.6 David Fine [\[PDA-052\]](#) and [\[PDA-056\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
[PDA-052] Requests to participate in issue specific hearing 1 on 16 and 17 September 2026 (ISH1) and/or attend the venue in person: Catching The Light - a technical review of East Pye Solar and alternatives			
DF-PDA-001	Opening Remarks	<i>Applicant's Note:</i> <i>An Abstract has been submitted as part of this submission and has not been duplicated here. It summarises matters that are addressed in more detail later in the submission. The Applicant has therefore responded to these matters in the relevant sections below.</i> <i>An Author's Note has also been submitted as part of this submission and has not been duplicated here. It provides contextual information on the structure of the submission, the author's background and referencing approach, and does not raise substantive matters requiring a response.</i> <i>An Introduction has also been included, setting out the purpose, context and approach of the submission, including reference to the Planning Inspectorate's letter dated 15 July 2026 and EN-1. As it does not raise substantive matters requiring a separate response, it has not been reproduced here.</i>	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
DF-PDA-002	Alternatives	Local East Pye Solar's Application Itself EN0110014-000105-6 East Pye Solar Environmental Statement Volume 1 Chapter 5 Reasonable Alternatives and Design Evolution Wind & BESS 5.1.5 page 5 'The BESS allows for energy to be released 'on demand' at time of greater need, in a way that cannot be provided by wind turbines at this time.' This is not true. Scottish Power has been doing just this since 2022; i.e. wind and BESS working in tandem. ['Whitelee (BESS), co-located at Ardochrig with Whitelee Windfarm.' https://www.scottishpowerrenewables.com/bess]	The Applicant agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets. The Applicant, however, is a solar and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. The Applicant does however note that due to the greater diurnal predictability of the sun vs. the wind, BESS operation can be scheduled more confidently when co-located with a solar scheme than with a wind farm. The BESS is proposed to support the operation of the principal solar site. 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. Further, although the government is seeking a multi-technology electricity system, their analysis has concluded that "A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind <u>and</u> solar"

ID	Theme	Comments/Issues Raised	Applicant's Response
DF-PDA-003	Alternatives	Wind Turbines – their looks 5.1.4 page 5 ‘Onshore wind is not considered to be a suitable alternative because the flat topography of the Order Limits would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise.’ The applicant provides no evidence to verify, still less substantiate, that flat topography would give rise to greater adverse visual effects etc. However a little beyond the applicant's sixteen parishes lies the Eye Wind Farm, operational since 2013, has a maximum tip height of 130 meters yet are just 750 metres and in sight from the Grade II listed Goswold Hall amongst other domestic buildings. [https://www.thriverenewables.co.uk/projects/eye-wind-farm] and https://heritage.suffolk.gov.uk/Designation/DSF5812]	The Applicant has provided a response at DF-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The cover photo is Eye Wind Farm Turbines from Eye Castle a mile away rotating in a gentle breeze. (I find them quite soothing, other people don't notice them, which is also good.) In terms of scale with the David Fine IPR FBFC0B6FD wind farm near, East Pye Solar's footprint - the size of Heathrow Airport - is Brobdingnagian. By comparison a series of wind farms similar to Eye, where virtually all agricultural land remains usable, is more or less the size of toenails of a citizen from Lilliput. Which is more attractive to the eye? Just around and mainly south of the proposed Great Moulton BESS complex are myriad opportune sites similar to Eye Wind Farm on equally flat land. The inevitable conclusion is wind options should have been and should be considered by the applicant. The fact their expertise may not lie in this field is irrelevant to the force of the argument. The Inspectorate may be of a mind or take advice to request the applicant to reconsider and research wind power generation before going further. (Not quite an aside, to the best of my knowledge there are no fixed planning	

ID	Theme	Comments/Issues Raised	Applicant's Response
		guidelines regarding the looks and similar aspects of wind turbine installations.)	
DF-PDA-004	Alternatives	Wind Solar Mix or Hybrid Solutions For wind, solar or hybrid solutions, as well as sun there's plenty enough wind throughout South Norfolk, night as well as day:- (The Met Office kindly supplied the author with daily data for the last year from Tibenham Airfield. As requested this was given for above 6mph, when wind turbine blades start to turn; above 11mph when they start to reach maximal efficiency. They gave me gust speed too. Highlight figures:- Gust speeds well exceeded the 11mph threshold every day of the year. From April to September – the sunnier side of the year – 142 days above 6mph November to March – windy winters – 156 above 6mph April to September 45 above 11mph November to March 74 above 11mph Therefore just 67 days over the last year with less than 5mph breeze.	The Applicant has provided a response at DF-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Gratitude to the Met Office for these data inside 24 hours.) For a technical paper which works out ratios between wind and solar for hybrid solutions, please go to 'Design of wind and solar energy supply, to match energy demand.' Mertens S, (2024) Cleaner Engineering and Technology 6 100402 https://www.sciencedirect.com/science/article/pii/S2666790822000076 It is definitely worth a read – not too technical if you skip the formulae – and as an appendix I've quoted the abstract in full. Mertens also states:- 'Local battery storage of the peak power production is much more expensive as this approximately doubles the energy price (€ per useful kWh according to (Bluesky, 2018)) and cable pooling also cuts the costs for the transport of the energy.' p7 and 'Curtailment losses of the baseload mix are thereby shown to be small.' p1	

ID	Theme	Comments/Issues Raised	Applicant's Response
DF-PDA-005	Alternatives Grid Connection Need	Going It Alone If located in north Ecuador, 0 degrees latitude at the equator in the midst of the doldrums photo-voltaics become omnipotent, but we're in South Norfolk Instead of considering a hybrid wind-solar mix, East Pye Solar goes it alone with photo-voltaic. They proudly proclaim:- 'Up to 500 megawatts (MW) of electricity... to power approximately 115,000 homes' This claim requires unpacking. Is it warranted? a) Mw & Mwe Mw or megawatt is a measure of power generated, Mwe is the measure of the amount of electricity as an output reaching the user (Technically we should be billed in kwe hours not kw hours since this is what you pay for. The 'e' is a sort-of electrical equivalent of VAT.) With East Pye the 'e' is the loss between the panels and the National Grid. Hard to place an exact figure when the proposal gives no technical information, but aside from solar panel tilt motors etc. a loss of 10% in the BESS alone could be expected.	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.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Up to 450mwe is a far truer estimate than 500mw, or 103,500 homes not 115,000. This is not made clear in the East Pye Proposal.	
DF-PDA-006	Need	b) Seasonal Variations 'Up to 500Mw' is the summer solstice, or for home use 450Mwe. At the mid-winter solstice, the time of peak demand for heating, due to shorter days and lower suns, the effective power will drop from 450Mwe to around 67.5Mwe or 15,525 homes, or 13.5% of the 115,000 homes East Pye Solar say they will serve. Where does the remaining 437.5mw to heat our homes come from? Wind, nuclear but also gas. With their reliance on gas in winter to deliver 'the clean power sprint to deliver a clean power energy system by 2030.' East Pye Solar and at a national level the ninety others needed to meet the government's stipulated solar targets are running backwards in the wrong direction, even with the Department of Energy and Net Zero's blessing.	The Applicant refers to its responses in rows AP-PDA-007, AP-PDA-002 and DF-PDA-005 above.

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DF-PDA-007	Alternatives	East Pye Solar, Mixed Hybrids and National Policy In everyday life on the ground, wind-solar hybrid mixes are the better option. But at the national level of government policy there is an insistence that wind and solar, two renewable and co-related energy forms, ideally made to be hybrid, must inhabit entirely different worlds in 'the clean power sprint to deliver a clean power energy system by 2030.' [https://www.gov.uk/government/publications/clean-power-2030-action-plan/clean-power-2030-action-plan-a-new-era-of-clean-electricity-main-report] These worlds are even further apart than the moons of Jupiter since they at least orbit their parent planet. Weird, bizarre, perverse, irrational, make of it what you will, but nevertheless the arbitrary separation at a policy implementation level of wind from solar ought to be taken into account when the Planning Inspectorate assesses East Pye Solar's application. Both examining it as a whole, and in particular, Environmental	The Applicant notes that the Examining Authorities' Rule 6 letter [PD-005] sets out that the PA2008 makes it clear that, in making a decision, the relevant Secretary of State (SoS) "must decide the application in accordance with any relevant NPS" (s104(3)), subject to certain provisos. Essentially, the provisos are that the application must not breach legal or treaty obligations, and that any adverse impact of the Scheme would not outweigh its benefits. The SoS is entitled to disregard any representations, that relate to the merits of the designated National Policy Statement (NPS).

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		Statement Volume 1 Alternatives against EN-1, EN-3, EN-5. Wind-solar hybrids ought to be ruled in not out, or at least brought in from the cold.	
DF-PDA-008	Alternatives	Planning Guidance Issues East Pye Solar & EDF BESS In 2027 EDF's Norwich battery energy storage scheme between Dunston and Swainsthorpe will go on line. This is about half-a-dozen miles north-northwest from East Pye Solar. They do not even mention it in their statement of alternatives, in particular potential locations and most specifically EDF Norwich link to National Grid. EDF Norwich BESS will feed into the regional distribution network. It will take surplus energy from the National Grid, store it up to release when needed to provide power to Norwich and surrounds. Regardless of short-term contingencies and deficiencies of the National Grid, East Pye Solar will store up energy in their BESS complex to release into the National Grid feeding the Norwich area when needed to	The Statement of Need [APP-206] explains that the BESS is proposed as part of the Scheme to support its operation by storing energy when it is generated in abundance and releasing it to the grid when it is needed. 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. By connecting to the National Electricity Transmission System (NETS) the Scheme will be able to provide energy for bulk transmission to consumers both nationally and locally, through existing connections between the NETS and the local distribution grid. The BESS is proposed through its same point of connection and will therefore be fully able to support the principle solar site through its operational life. The delivery of generation and storage facilities which connect to both the NETS and local distribution systems is

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		provide power via the regional distribution network. So energy will go up into the grid only to be taken a few miles down from the grid. (To reduce power loss national grid operators attempt to ensure energy travels minimum distances.) In other words, energy is forced to divert via c when it could directly from a to b. Or in order to walk from the Department of Energy and Net Zero's offices in Whitehall to the Houses of Parliament you have to cross Hungerford Bridge along the Southbank then back again across the Thames at Westminster Bridge. However since both schemes link to the national grid, there is not even a need to go from a to b, everything could be placed at a. East Pye Solar utterly ignore this option in their alternatives when it is in plain sight on the ground at EDF BESS Norwich. This needs to be addressed. The fact that EDF and East Pye Solar are separate organisations also held under differing and divergent means of approval is	important to ensure that the GB electricity grid can operate flexibly and securely at all times. Paragraph 3.2.4 of NPS EN-1 explains that "It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system." The Applicant therefore agrees that the policy position is that developments should come forwards and be assessed separately, which is the Applicant's approach. The Applicant therefore also refers to its response to DF-PDA-007 above. Paragraph 3.6.8 of the Site Selection Assessment recognises the high number of existing, consented, and planned infrastructure within the north Siting Zone 3, considered as a potential alternative to the location for the National Grid Substation, in proximity to Norwich Main Substation, including the granted planning application for a BESS (submitted by EDF Renewables), which has been built out (2023/0617), as well as other storage infrastructure including a granted application for a 400MW BESS (submitted by Innova Renewables Development Limited) (2024/3750).

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		no direct concern of and for the Planning Inspectorate. They have the decision whether or not to approve a scheme for energy generation which is logically incoherent and intrinsically inefficient in delivering the Department's 'Overarching National Policy Statement for Energy'(EN-1). The Inspectorate may wish to view this section alongside '4. Technicals: National Grid Connection: Norwich-Brampton or Norwich-Tilbury?' page 13 below.	
DF-PDA-009	Cumulative and In-Combination Effects	Competing Nationally Significant Infrastructure Projects Location, Location, Location Cheek by jowl to East Pye Solar are two further Nationally Significant Infrastructure Energy Projects, each virtually identical in form, nature and seeking planning permission:- TASWAY Energy Park – Aukera Energy – immediately west of East Pye Solar [https://taswayenergypark.co.uk/]	The Applicant is aware of other projects in the region. The ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. EcoPower Suffolk Solar EN0110019 is included within the cumulative developments list, as detailed in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP- 058]. Regarding Tasway Energy Park, the Applicant understands that the Tasway Energy Park project is on indefinite hold and is no longer identified on the

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		EcoPower Suffolk Solar near Yaxley between Diss and Eye	Planning Inspectorates website as a DCO project. If this position changes during Examination and further information becomes available then the Applicant will update its cumulative effects assessment accordingly. Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.
DF-PDA-010	Transport and Access	1. Road Traffic This means three Heathrow Airport footprints down fifteen miles alongside the A140 – locals are starting to name it 'solar panel alley' and if they all get the go-ahead, years of fifteen miles of roadworks, bottlenecks, tailbacks and rat-running around solar park vehicles will make the M25 on a bad day seem like a practise session at Silverstone, never mind the consequent chaos on the adjoining country lanes. (The simple moving single-lane EDF road works entailed several months of up to half-hour delays. Two more complex sets of roadworks operating together will doubtless increase delay due to tailbacks backing onto tailbacks. Since there are potentially three	The Applicant acknowledges the concerns raised regarding the potential combined impact of multiple energy developments in the area on the local highway network. The cumulative transport effects of the Scheme alongside other committed developments have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047], including consideration of cumulative traffic impacts during the construction phase.

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		separate companies each rushing to meet completion deadlines there is a low probability they will co-operate to reduce congestion on a Highways Agency designated national route.) The Inspectorate may take account of this added disturbance and disruption.	
DF-PDA-011	Transport and Access	2. Precedence The Planning Act 2008 established the Infrastructure Planning Commission [https://www.legislation.gov.uk › ukpga › 2008 › contents] Subsequently it would review separate potential sites amongst its deliberations on a particular application. For example, with Heathrow Terminal 5, Gatwick and Stanstead were clear competitors before the Government went with Heathrow. (In planning terms Courts of Appeal are irrelevant as after the fact.) If major alternatives well over an hour's drive on a good day to Terminal 5 were considered, it sets a fair and reasonable precedent that the trio of East Pye Solar, TASWAY Energy Park and EcoPower Suffolk Solar should also	The Applicant refers to its response to DF-PDA-009 regarding EcoPower Suffolk Solar and Tasway.

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		be considered together, not geographically separated. They are contained within a rough fifteen by eight mile trapezoid while by comparison, a single national infrastructure project cross-rail aka Elizabeth Line is 71 miles long, while HS2 is well over a hundred, possibly more depending whether fate takes it to Manchester. Unlike Cross-Rail and HS2, these three photo-voltaic schemes are local projects and adjacent on the ground, regardless of their Nationally Significant Infrastructure denotation in Westminster or elsewhere.	
DF-PDA-012	Need	3. Speed or pace of completion • East Pye Solar reckon they won't be on-line till 2031. This means around eight years minimum and after the government's 2030 deadline. • EcoPower Suffolk Solar reckon 2030 or five-and-a-half years from inception. • TASWAY Energy Park inception date was 2025 but no end date since the project has been paused. (Maybe to await the outcome of East Pye Solar but nonetheless it should be factored	The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale. The suite of National Policy Statements (NPSs) for energy confirm that substantial weight should be given to the need for low carbon generation schemes to which the NPSs are of relevance, such as the Scheme. Paragraph 3.3.12 of NPS EN-1 states that decentralised and community energy systems could lead to some reduction in demand on the main transmission system, but the government does not

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		into the Inspectorate's deliberations as one or both schemes could be approved or rejected, if by different sets of inspectors, and decisions overturned by different secretaries of state.) Near Diss are two schemes working towards completion:- • Marsh Lane 4.5 years incept to completion [https://www.aurapower.com/projects/marsh-lane] • Grange Solar Farm, also 4.5 years incept to completion [https://palgrave-pc.gov.uk/solar-farm/grange-solar-farm/] As well as ahead of the government's 2030 deadline these initiatives disprove the myth that Nationally Significant Infrastructure Projects in planning terms are speedier than local authority mediated schemes, however hard the Planning Inspectorate drive and are driven to hurry up the process. After reading this section the Inspectors may consider schemes at the local authority level of planning are a quicker thus more effective way to reach national 2030 targets instead of the current NSIP regime run purely at a	believe they will replace the need for new large-scale electricity infrastructure to meet the UK's energy objectives. NPS EN-1 goes on to explain that the connection of large-scale generation facilities via high voltage transmission systems enables the pooling of generation and demand and enables the efficient bulk transfer of power between areas with surplus and areas in deficit and therefore demonstrates support for large-scale ground mount solar schemes alongside the development of smaller schemes.

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		national level. In terms of any haste to complete, then East Pye Solar and kindred schemes appear to back-markers if not also-rans. Though this may not be complete grounds or evidence for refusal, it does inform the current viability of NSIP Solar planning criteria, which is explored further in 'Sizewell C x 62 and Nationally Significant Infrastructure Projects.' page 16	
DF-PDA-013	Cumulative and In-Combination Effects Grid Connection	<i>Applicant's Note: Point 4 of the submission contains an extended discussion of the Project's proposed grid connection, including extracts from other documents and supporting commentary. To aid clarity and avoid reproducing lengthy supporting material, the Applicant has summarised the substantive points raised below. The Applicant has considered the section in full when preparing its response.</i> Summary of substantive points raised in Point 4: 1. The Interested Party considers that East Pye Solar, TASWAY Energy Park and EcoPower Suffolk Solar should be considered together alongside planned	The Applicant notes the comment and is unable to respond to the comments directed to National Grid, similarly the proposed Apex Norwich Data Centre. However, the Applicant can confirm that it originally applied for a 500MW grid connection into the Norwich Main substation. Subsequently, National Grid advised that there was no capacity available at the Norwich Main substation nor the option to extend the substation to accommodate the connection. National Grid then advised that there was capacity available connecting into the Norwich-Diss overhead line, to which the applicant agreed to use as the point of connection for the Scheme. The Applicant will continue to proceed in accordance with the agreed Bilateral Connection Agreement with National Grid Should there be a

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		National Grid development in the area, and suggests that there may be opportunities for the projects to share or make greater use of existing or proposed grid infrastructure. 2. The Interested Party questions whether NGET's advice that there was insufficient capacity at Norwich Main Substation took account of the proposed Norwich to Tilbury reinforcement and argues that this should be independently reviewed. 3. Reference is made to planned works at Norwich Main Substation and the wider Norwich to Tilbury project. The Interested Party considers that these works could provide sufficient capacity by 2031 to enable Norwich Main Substation to become the Point of Connection for East Pye Solar, potentially through modifications to planned infrastructure. 4. The Interested Party also refers to the proposed Apex Norwich Data Centre and its anticipated electricity demand and substation requirements as further evidence that Norwich Main Substation	variation of the agreement in the future, the Applicant will then continue to act in accordance with the new agreed terms. The Applicant can confirm that the proposed BESS as part of the Scheme is associated development, and as such is subordinate to the solar. This means it serves to balance the export of excess solar generation in addition to ancillary services it provides to the National Electricity Transmission System. As such, this development exists to serve a separate function as the Norwich to Tilbury upgrade and so both projects are necessary to contribute towards the government's net zero targets.

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		may have scope to accommodate additional infrastructure. 5. On this basis, the Interested Party considers that the Applicant could return to its originally considered connection at Norwich Main Substation rather than progressing the proposed connection arrangements associated with East Pye Solar, and suggests that this could reduce costs, environmental effects and impacts on local communities. 6. The Interested Party considers that the same reasoning applies to TASWAY Energy Park and EcoPower Suffolk Solar and argues that the Norwich to Tilbury upgrade could remove the need for BESS infrastructure associated with all three projects. It is suggested that the Examining Authority should consider coordination between the respective projects and National Grid infrastructure proposals.	
DF-PDA-014	Funding The Applicant	5. Extra-technicals Technically East Pye Solar and similar schemes require hook-up to the National Grid	The Applicant refers to its response to AP-PDA-004.

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		in order to acquire Nationally Significant Infrastructure Status, which in turn requires conformity to the policy document 'Overarching National Policy Statement for Energy' (EN-1) which in turn is why we're here in Dunston Hall. East Pye Solar is wholly owned by Island Green Power where in turn Macquarie Group are 100% shareholders. Macquarie also entirely owns National Gas, acquiring the final 20% in September 2024, and it is in their and their consortium shareholders' financial interests that it stays in profit regardless of the Department for Energy Security & Net Zero's Overarching National Policy Statement for Energy (EN-1) target to reduce reliance on gas to virtually zero by 2030. (EN-1 2.2.6 p.15) [https://www.ajbell.co.uk/news/articles/brief-national-gridcompletes-ps36-billion-sale-national-gas] Whatever else, from this point of view Macquarie and similar consortia are compelled and constrained financially to do their utmost to ensure this net-zero target is never reached. No gas, no gas grid, no money in National Gas.	

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		In conclusion the Planning Inspectorate state they will be guided by national policy statements and in particular in this respect EN-1 Overarching NPS for Energy 2025. This extra-technical section, summarised in the preceding paragraph, makes an exceptionally strong case that East Pye Solar's application, amongst others, runs directly and irredeemably counter to government net-zero policy which the Inspectorate are guided, virtually bound by. This case may be considered exceptionally strong grounds for refusal, both necessary and sufficient, leaving the Secretary State for Energy and Net Zero to overturn those grounds, should she wish.	
DF-PDA-015	Alternatives	Applicant's Note: <i>The Applicant has summarised the section titled Regional & National (or extra-local), from Sizewell C Solar through to Enlarging not Reducing the UK Carbon Footprint (pages 18–22 of the submission). To aid clarity and avoid reproducing lengthy supporting material, the substantive points raised are summarised below. The Applicant has considered the section in full when preparing its response.</i> 1. The Interested Party proposes that solar generation could instead be	In relation to Point 1, solar generation at the Sizewell C construction site was not among the alternatives considered by the Applicant. NPS EN-1 Paragraph 4.3.9 states: 'As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective.' Further, NPS EN-1 Paragraph 4.3.24 provides that: "The Secretary of State should not

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		located at the Sizewell C construction site following completion of construction, using existing grid infrastructure and avoiding the need for extensive new cable corridors, substations and BESS infrastructure. 2. The Interested Party suggests that this approach could be replicated at other nuclear and gas power station sites across the UK, making use of existing National Grid connections, including those remaining after gas-fired power stations are decommissioned. 3. Based on calculations presented in the submission, the Interested Party considers that using existing power station sites for solar or wind-solar generation could make a significant contribution towards the Government's solar generation targets. 4. The Interested Party considers that this distributed approach would represent a more efficient use of existing energy infrastructure than developing individual large-scale solar schemes requiring new grid connection infrastructure.	<i>refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals."</i> As set out within the Site Selection Assessment [APP-215] and Statement of Need [APP-206], the availability of a grid connection is a key factor in the siting of solar PV infrastructure, which is recognised in NPS EN-3 Paragraphs 2.10.16 and 2.10.17. The Applicant has accepted a Connection Offer from NESO to connect the Scheme to an existing part of the NETS which passes over the Site, via a new National Grid substation. This existing part of the NETS has sufficient capacity to transmit the energy the Scheme will generate to both local consumers and across the country where it is required. Sizewell C is located outside of the 20km radius from the Point of Connection identified into the overhead line south of Great Moulton. Sizewell C is located over 30km to the south-east and was not considered as a reasonable alternative to the Scheme. As set out within Paragraphs 5.6.9 and 5.6.10 of the Statement of Need [APP-206], first commercial operation of Sizewell C could extend well into the second half of the 2030s. Construction

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		5. The Interested Party considers that the 100MW threshold for solar NSIPs is inappropriate and suggests that schemes should instead be assessed against their technical efficiency and effectiveness within the regional distribution network. 6. The Interested Party considers that applicants should be required to take account of other energy schemes, irrespective of their planning status, and argues that considering projects individually can result in inefficient infrastructure planning. 7. The Interested Party proposes a regional distribution model in which greater use is made of rooftop solar on commercial, industrial and domestic buildings. Calculations are presented which the Interested Party considers demonstrate that this could make a substantial contribution towards national solar generation targets. 8. The Interested Party considers that a regional distribution model could provide employment, training and career benefits and reduce competition	efficiencies may be secured through replication of construction methods from Hinkley Point C to Sizewell C but are not guaranteed. The development of the Scheme, which makes use of existing and available capacity on the NETS, is an essential part of delivering to the urgent need for significant new renewable generation capacities to connect in the next decade to support the drive towards net zero. NPS EN-1 Paragraph 4.3.23 states: <i>'The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.'</i> In relation to Point 2 and 3, the Applicant notes that the connection points for several decommissioned thermal generation sites have been secured by renewable generators to bring forward projects to meet the national need for clean power on the way to net zero by 2050. In relation to Point 4, the Applicant refers to the Government's Connections Action Plan, which notes that the efficient utilisation of existing networks can defer or negate the need for expensive new infrastructure, which takes time to deliver. This is

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		for construction labour compared with large-scale solar projects such as East Pye Solar. 9. The Interested Party also considers that localised distributed generation could result in lower construction-related carbon impacts than large-scale solar development, including by reducing the infrastructure, construction activity and battery requirements associated with schemes such as East Pye Solar.	relevant to the Scheme, which proposes to make use of the existing and available capacity in the overhead lines to which the Scheme proposes to connect. It is not a given that the connection of smaller schemes to lower-voltage networks can be delivered in a more efficient way, or deliver greater benefits (refer also to response DF-PDA-012 above). In relation to Points 5 and 6, the Applicant refers to its response to DF-PDA-007 above. In relation to Points 7, 8 and 9, the Applicant refers to its response to DF-PDA-012 above. Further, in relation to Point 9, the Applicant refers to ES Volume 1, Chapter 6 - Climate Change [APP-042] which sets out the carbon costs and benefits of the Scheme.
DF-PDA-016	Transport and Access	Speed Limits If only to encourage the Department of Energy and Net Zero and Department of Transport to have a positive discussion, a really simple means to work towards the 2030 net zero target is reduce the speed limits by 10mph on motorways, dual-carriageways and single carriageways. Motor vehicles use energy, be it electricity or fossil fuel, and the	The Applicant notes this comment.

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		10mph reduction will significantly reduce carbon emissions. You could say this was a nationally significant infrastructure project too, although the only infrastructure alterations required are the amendment of some speed limit signs and recalibration of speed cameras. This is not the time nor place to rehearse arguments (petrol-heads won't like it, but the accident rates and seriousness will fall and levels of vehicle pollution drop too) All the same the Inspectorate may wish in their findings to allow the concept credence. It may foster a more creative and imaginative approach at the national level too.	
DF-PDA-017	Concluding Remarks	<i>Applicant's Note: The Conclusion – Results and Outcomes sections (pages 24–25 of the submission) summarise and draw conclusions from matters raised earlier in the submission. To avoid duplication, these points have not been repeated here and are addressed in the relevant sections above. The Applicant has considered these sections in full.</i>	The Applicant notes this comment.

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DF-PDA-018	Concluding Remarks	<i>Applicant's note:</i> <i>The Interested Party's submission included an appendix titled 'Design of wind and solar energy supply, to match energy demand'. The Appendix reproduces the abstract of the paper 'Design of wind and solar energy supply, to match energy demand' (Mertens S, 2024), which is referenced in the Wind Solar Mix or Hybrid Solutions section of the submission. To avoid duplication, the Appendix has not been reproduced here. The substantive points for which the paper is cited are addressed in the Applicant's response to that section above at DF-PDA-001 to DF-PDA-017.</i>	The Applicant notes this comment.
[PDA-056] Requests to be heard orally at the preliminary meeting (PM) and/or attend at the venue in person			
DF-PDA-019	Human Health and Wellbeing	Safety The Inspectorate may take a view to consider within Annex C 'Community, health and well being' that 'Battery energy storage system (BESS) safety provisions and implications' is better placed under a separate section 'Safety.' This is because these implications are universal. They apply to all such schemes, be they adjacent to South Molton, Devon;	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 detailed BSMP to be submitted to and approved by the

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		Moulton, Texas or indeed anywhere in the world. 'Community, health and well-being' refers just to that community, namely the South Norfolk Claylands. The implications of these safety issues are generic, not merely specific. There is also the danger that within the same basket of eggs, neither set of issues will be addressed adequately, or that one dominates the other. Furthermore, the experts involved in the safety or otherwise of battery energy storage systems are totally separate from the other issues in the community, health and well-being section. To summarise: in the Inspectorate's eyes these safety issues must be serious enough to warrant inclusion, and as they are not specific to the Claylands, both merit and require a separate discrete section.	relevant planning authority that must consult with the with Norfolk Fire 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. Human health has been assessed in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] which considers human health in relation to transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects. Mental health has also been considered, as presented in the Equality Impact Assessment [APP-214] and the Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27], which reviews evidence and representations submitted during the Examination. The Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197], Outline OTMP [APP-202], Outline LEMP [APP-199], Outline PRoWPPMP [APP-203] and Outline ESSC [APP-205] outline measures taken 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

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			contained within Schedule 2 to the Draft DCO [AS-032]. The Human Health Statement concludes that, with embedded mitigation and additional noise mitigation measures in place, the Scheme is not expected to result in likely significant adverse residual effects on human health. While some residual landscape and visual effects remain in limited locations, these are not anticipated to result in significant long-term effects on health or wellbeing, including for children and young people.
DF-PDA-020	Consultation and Engagement	Consultation We only heard about East Pye Solar because my wife picked it up on local facebook this May – the size of it left her in tears; its dangers leaves me fuming. The reason it was so late in the day is because, to quote from South Norfolk District Council's earlier submission:- 'Therefore, on the information provided by the applicant, it appears that the full statutory consultation documents were not sent to Pulham Market Parish 1 Council or Framingham Earl Parish Council. Statutory consultees should not have to go out of their way to find documents, correspondence and	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

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		websites and then take the initiative to provide responses on this material when they have not been asked to do so. In view of the above South Norfolk District Council cannot see how the additional statutory consultee identified by the applicant have been properly consulted as required by section 42. The Council consider that the secretary of state must take steps to confirm whether or not the applicant has complied with section 42 before accepting the application for examination. Conclusion 'For the reasons set out above the statutory consultation undertaken by the applicant has fallen short of what South Norfolk Council would expect to see on a project of this scale and nature. The Planning Inspectorate, on behalf of the secretary of state, will need to consider carefully whether to "accept" the application or whether further steps are required to overcome the noncompliance identified.' [Examination Library AoC-007 February 2023] Well, were further steps taken?	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. 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 Parish 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		The lack of public consultation has meant we've no true opportunity to become involved a year-and-a-half ago, and others may surely feel the same, if they are even aware of East Pye Solar – you wouldn't be reading had these duties been fulfilled. It seems only fair, right and proper that space and time is made by the Inspectors to rectify the error. It's just question of how long. If Island Green Power got their skates on, two-three months should do it, and a couple of weeks to wrap up the results for further action. (Because of earlier negligence I'm working to the same deadline too.) Never mind externally imposed time constraints does the Planning Inspectorate disagree? The above I would intend to speak at Dunston. I've timed it at under five minutes. The below is just additional written material.	under Section 47 of the Planning Act 2008) 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	Comments/Issues Raised	Applicant's Response
DF-PDA-021	Major Accidents and Disasters	The Semantics of Safety There is a semantic point which by no means is mere semantics... BESS refers to a battery energy storage system, like our tv remote with two AAA leadnickels to energise our tv before we fall asleep in front of it. They are hardly likely to catch fire while we're asleep. Rechargeable lithium-ion batteries do carry that risk, since otherwise it would not be set as a separate safety issue by the Planning Inspectorate to interrogate. This accords to the International Organization for Standardization (ISO or worldwide federation of national standards bodies) decision in January 2026 to revise their ISO 3941 to include rechargeable lithium-ion batteries as a separate Category L for fire hazards. Apart from being inexact to the point of laxness, the phrase 'BESS' softens those hazards and their dangers so its users may lessen or already have lessened their awareness. I make no apologies for seeming to be pedantic. To concatenate our tv remote control with the Great Moulton installation is tantamount to	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 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>

ID	Theme	Comments/Issues Raised	Applicant's Response
		saying my bike and a moon rocket are travel systems, and therefore similar. To keep our critical faculties fully aware a short-hand phrase such as LiBs¹ used in the briefing note already held by the Inspectorate from February 2025 may be preferred in any dialogue, verbal or written. [n.b. LiBs could be pronounced 'li-bees' which stresses both lithium and battery, which is far less clumsy than BESS-s for more than one BESS. It's also lexicographically more acute, like sheep or aircraft, the same word for singular and plural – a flock of sheep or fleet of aircraft. An array of li-bees, maybe?]	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 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 detailed 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.
DF-PDA-022	Site Visits	Site Visits As a landscape archaeologist I'd be delighted to oblige to help show how the South Norfolk Claylands work, and have kept the diary clear for the week starting 16th November. Were this offer taken up, lest the weather meant we had to stay indoors and for the record, I will prepare a powerpoint comprising photographs, maps etc. rather than bullet-points as slides, and notes as explanatory captions, which is the standard way archaeologists and other landscape academics and professionals present to audiences. I will also produce a .pdf for those who do not use Microsoft Powerpoint.	The Applicant notes this comment.

Table 4.7 Diane Goodwin [PDA-057]

ID	Theme	Comments/Issues Raised	Applicant's Response
DG-PDA-001	Opening Remarks	I have lived in the village of Tivetshall St Mary for more than 50 years. It was a sleepy peaceful parish, you could move about freely and safely. Our pets were safe. Our pets are valuable companions to us. No pavements along The Street where I live. Today there has been change. Two pavements around the primary school and Green. None nor any space for them to be built between most of the housing and our Post Office. Which children and the elderly still navigate.	The Applicant notes this comment.
DG-PDA-002	Landscape and Visual	My objection is the loss of rural character. The visual impact. I paint and before retiring taught in Norwich . This solar project will transform our landscape from countryside to town. It will obscure the views of our current natural surroundings. The clean air provided by trees and hedging. During Covid I had limited time outside due to the restrictions. That limitation impacted my mental health. When the restrictions were lifted my mood and wellbeing improved dramatically as I	The Applicant acknowledges the concerns raised regarding the perceived loss of rural character, openness and tranquillity, and recognises that residents may have a strong personal connection to the existing landscape and value it for recreation, wellbeing and enjoyment. The assessment of landscape and visual effects has considered the effects of the Scheme on landscape character, views and visual amenity, including the experience of residents and users of the surrounding countryside. The assessment recognises that the introduction of solar arrays,

ID	Theme	Comments/Issues Raised	Applicant's Response
		was able to venture out and sit near our open green spaces taking in the far reaching views. I was able to appreciate the natural world by the openness of our village once more.	substations, BESS infrastructure and associated mitigation planting would alter the character and appearance of parts of the landscape and result in changes to existing views. These effects are assessed in detail within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The Applicant does not agree that the Scheme would transform the area from countryside to town. The Scheme would remain located within a predominantly rural landscape, with the existing landform, field pattern, woodland blocks, hedgerows, settlements and wider landscape framework retained. 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]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening /

ID	Theme	Comments/Issues Raised	Applicant's Response
			reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032].
DG-PDA-003	Ecology and Biodiversity	Our village and its surrounding land is home to many birds, hares, deer. There are natural ponds and water courses hosting the insects and frogs and toads. Our natural environment needs to be preserved not destroyed with panels, battery units, fencing, cameras, lighting, workers disturbing wildlife as they build and maintain it. Our agricultural fields transform the area during the seasons as the crops germinate, grow, mature and are harvested. It employs local people. It creates an understanding for our young	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BAPC-003, HePC-007, SPC-010, SPC-066, and BAPC-003.

ID	Theme	Comments/Issues Raised	Applicant's Response
		residents and visitors of nature and its importance to the survival of our planet.	
DG-PDA-004	Landscape and Visual	I am utterly opposed to the destruction of our natural environment and all that thrives within it. This project will destroy our village rural landscape and create a large industrial 'city' in its place. Traffic will increase. I strongly object and oppose the East Pye project.	The Applicant acknowledges the concerns raised regarding the potential impacts of the Scheme on the local community and transport network. The transport effects associated with the Scheme 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]. ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] has considered the visual amenity effect on the PRoW as a receptor including sequential effects, with affected length of PRoW and direction of travel considered where required. In addition, multiple View Locations including from the PRoW network have been assessed as detailed in ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147].

Table 4.8 Emile Hildreth [PDA-074]

ID	Theme	Comments/Issues Raised	Applicant's Response
EH-PDA-001	PRoWs and Recreation Cultural Heritage	I live in Long Stratton and regularly use the surrounding countryside, including local Public Rights of Way around Long Stratton in particular Public Footpath 3 and 4 (FP3 and FP4). This representation concerns how the application should be examined. I do not repeat my full Relevant Representation. I ask the Examining Authority to ensure that the following issue is sufficiently tested during the Examination. The issue I ask the ExA to examine is whether the Environmental Statement and proposed mitigation adequately assess the cumulative effects of the proposed solar scheme on the local landscape's character, tranquillity, and public rights of way through the countryside around Long Stratton, including the impact on views, openness and the setting of local landmarks such as St Michael Church.	The Applicant acknowledges that a section of FP3 and FP4 are proposed to be temporarily closed during construction. Diversion routes and associated mitigation measures are set out within the Outline PRowPMP [APP-203]. No permanent closures are proposed, and the affected PRoWs will be reopened following completion of the relevant works. The Applicant acknowledges the importance of the local PRoW network for both recreation and connectivity. Where temporary impacts on PRoWs are required during construction, appropriate management and mitigation measures are proposed, including signage, alternative routes where necessary, traffic marshal support, reduced vehicle speeds in areas where construction traffic interacts with PRoW users, and advance notification of closures. A 15m buffer to PRoW has been incorporated into the design of the Scheme, as secured through the Design Principles, Parameters and Commitments [APP-213]. The interaction between the Scheme and the PRoW network has been assessed within ES Volume 1, Chapter 11 – Transport and Access

ID	Theme	Comments/Issues Raised	Applicant's Response
			[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. The assessment adopts a reasonable worst-case scenario, assuming all construction activities occur simultaneously. In practice, construction activities will be staggered across the programme, reducing the extend of concurrent effects on the PRow network. The assessment concludes that, with the proposed mitigation in place, effects on PRow users would not be significant. 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]. In response to the ExA question 1.11.4, the applicant will be assessing effect on sequential routes where users will traverse more than one PRow.
EH-PDA-002	PRowS and Recreation	To also gather other residents' experiences of travelling through the countryside which would be affected. My own observations of the area are that during my walks in this	A minimum 15m offset (including security fencing) from all PRow is secured through the Design Principles, Parameters and Commitments [APP-213] . In respect of the new permissive paths,

ID	Theme	Comments/Issues Raised	Applicant's Response
		area I encounter great amounts of people using the countryside including other walkers, cyclists, runners and horse riders. My direct local knowledge is that the countryside surrounding Long Stratton is highly valued for its open views, peaceful rural character and extensive network of public footpaths. I regularly use Public Rights of Way FP3 and FP4, which provide opportunities to walk through open agricultural landscapes and experience long-distance views across the countryside. These routes are valued not only for recreation and wellbeing, but because they allow people to appreciate the changing seasons, agricultural landscapes and local landmarks, including St Michael's Church on Church Lane.	the Design Principles, Parameters and Commitments [APP-213] secure a minimum usable width for pedestrian access of 2m, with permissive paths having a 15m buffer to any infrastructure (excluding landscaping) associated with the Scheme. An Outline PRowPPMP [APP-203] has been prepared to provide a framework for the management of PRow, promoted walking routes and permissive paths, with the key objective being to ensure that these routes remain open and safe to use throughout the Scheme's construction, operational and decommissioning phases, where practicable. Assuming the representation refers to Long Stratton Footpath 3 and Long Stratton Footpath 4, the Outline PRowPPMP [APP-203] identifies a temporary diversion route via Brick Hill Lane, Church Lane and Long Stratton Footpath 5 whilst works associated with Sub-Site 4B are undertaken. As shown in the indicative construction programme within Figure 2.1 of the Outline CTMP [APP-201], these works would not take place throughout the full construction programme and are anticipated to be undertaken over a period of up to seven months. Following completion of these works, access would be reinstated in accordance with the existing alignment.

ID	Theme	Comments/Issues Raised	Applicant's Response
EH-PDA-003	PRoWs and Recreation	The well-known Boudicca Way walking route running between Norwich and Diss would be impacted by construction activity including possible diversions or closures where works may cross rights of way and vast sections passing through the areas where solar panels are present would blight the views and change the character of the landscape. The new screening hedges and tree belts would block the open views. The area is characterised by our open fields, historic villages and a sense of tranquillity that many residents such as myself value and actively choose to live near. I am concerned that the scale of the proposed development, extending across a wide geographic area and affecting multiple communities, which would fundamentally alter the experience of these routes and the surrounding countryside.	The effects on PRoWs and permissive paths, including Boudicca Way, have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] and the Outline PRoWPPMP [APP-203]. Where temporary impacts are required during construction, mitigation measures including signage, alternative routeing, traffic marshal support and reduced vehicle speeds are proposed to minimise disruption and maintain safe access. 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 - Public Right of Way Visual Amenity Assessment [APP-149]. This includes assessment on Boudicca Way and PRoW. The Applicant acknowledges that the assessment identifies significant visual effects for users of certain PRoWs, particularly during the construction phase and, in some locations, there is significant effect in Year 15. The ES also recognises the High sensitivity of recreational receptors, including users of the Boudicca Way and Via Beata Way. The design of the Scheme has been informed by an environmentally led approach, with landscape

ID	Theme	Comments/Issues Raised	Applicant's Response
			and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening / reinforcing existing hedgerows, 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] (which is a secured document) 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]. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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] .
EH-PDA-004	PRoWs and Recreation	The application appears to rely on mitigation measures including setbacks, landscape planting, hedgerow enhancement and tree planting to reduce visual effects and impacts on users of Public Rights of Way. The Applicant's assessment also concludes that the effectiveness of mitigation will increase as planting becomes established over time.	The Applicant refers to its response to EH-PDA-003.
EH-PDA-005	PRoWs and Recreation Landscape and Visual	What is not yet clear or sufficiently tested is whether the proposed assessment and mitigation adequately reflect the lived experience of residents who walk, cycle, ride and travel through the area daily. In particular: • Whether the assessment properly reflects the cumulative effect of encountering multiple areas of solar infrastructure across a large part of the local landscape. • Whether the proposed mitigation would simply replace open countryside views with screening vegetation, thereby altering the	The Applicant refers to its response to EH-PDA-001 to EH-PDA-003 regarding the proposed landscape mitigation and the impact to FP3 and FP4. <u>Cumulative impact</u> The cumulative landscape and visual impact assessment is carried out within section 7.11 of ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], which addresses the in-combination visual effects between the Scheme and other existing and/or approved developments. This concluded no significant cumulative effects to landscape and visual receptors as a result of the Scheme and committed developments.

ID	Theme	Comments/Issues Raised	Applicant's Response
		character of the landscape even if infrastructure becomes less visible. • The extent to which users of FP3, FP4 and other local routes would experience a loss of openness, tranquillity and rural character. • The likely effect on the setting and appreciation of St Michaels • Church as a historic local landmark experienced within its rural surroundings. • The effectiveness of screening during the early years of operation whilst the trees and hedges mature, and during winter months when vegetation would be reduced as a screen with lack of foliage.	<u>Screening</u> The mitigation measures proposed for the Scheme are proven, well-established measures used and secured on comparable solar and energy infrastructure projects. The Green Infrastructure Strategy [AS-005] includes 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] (which is a secured document) through a Requirement in the Draft DCO [AS-032]. A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out. The duration of management and monitoring for each landscape element created or enhanced will be in accordance with the Environment Act 2021 (to the extent applicable to the Scheme) and national and local policies. The LVIA identifies significant adverse effects where these are predicted to occur and does not seek to disregard them. Significant effects are identified during construction and in the early years of operation where receptors are in proximity to the Scheme. Where openness of the landscape is

ID	Theme	Comments/Issues Raised	Applicant's Response
			affected due to the proposed landscape mitigation, the effects are considered in the Year 15 assessment. The assessment also acknowledges that some significant effects would remain at Year 15. These conclusions are transparently presented within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and demonstrate that the assessment has robustly identified the Scheme's effects rather than seeking to understate them. Visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149]. In response to this comment and the request of the ExA, the Applicant will be preparing an assessment considering the sequential views from PRow, which will assess the visual amenity of PRow users who would traverse more than one PRow. This will include sequential effect on Long Stratton FP3 and 4. This assessment will be submitted in Deadline 2. <u>St Michaels and other churches</u> Assessment of churches which were considered to be sensitive to development within the Scheme were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 to APP-168]. It was considered due to the embedded and proposed mitigation within the Scheme, there would be no harm to the

ID	Theme	Comments/Issues Raised	Applicant's Response
			significance of churches and, in several cases, their settings will be improved by proposed mitigation measures. The Applicant notes the Interested Party's comments regarding the historic importance of Long Stratton. The assessments noted that Long Stratton Conservation Area and the Listed Buildings within were not taken forwards for further assessment, as it was considered that there would be no impact to the conservation area's character and appearance, nor the listed buildings setting or significance by the Scheme. This is largely due to the presence of the Long Stratton Bypass, which extends between Long Stratton, Site 4 and the Cable Route Corridor, the extent of which includes a large roundabout to the north of the village.
EH-PDA-006	PRoWs and Recreation	This matters to the ExA's recommendation because the issue is not solely whether solar panels can be screened from view, but whether a development of this scale would fundamentally change the character of the countryside around Long Stratton and neighbouring villages. Many residents like myself value this area because of its openness, dark skies, peacefulness, abundant nature and historic rural character. Public Rights of Way such	The Applicant refers to its response to EH-PDA-002 and EH-PDA-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
		as FP3 and FP4 are used to enjoy these qualities and to experience views across agricultural land towards local landmarks, such as St Michaels Church. The examination should therefore consider not only the visibility of individual elements of the Scheme, but also the cumulative impact on the experience of moving through what is currently an open and tranquil rural landscape. I therefore request that the ExA: 1. Please add or expand landscape character, tranquillity, public rights of way and cumulative landscape effects within the IAPI/issue tracking so that the specific effects on Long Stratton, Public Rights of Way FP3 and FP4, and the setting of St Michael's Church are specifically examined rather than included within a broader landscape heading.	
EH-PDA-007	PRoWs and Recreation	2. Please ask the Applicant to provide a clear assessment of: • the effects of the Scheme on users of Long Stratton FP3 and FP4;	The Applicant refers to its response to EH-PDA-002 and EH-PDA-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• how openness, tranquillity and recreational experience would change; • what would the effect of mitigation planting at Year 1, Year 10 and Year 15 be; • what would the impact on views to and from St Michaels Church, and its wider rural setting be. 3. Please provide a deadline at which Interested Parties can comment on the Applicant's response to the above questions.	
EH-PDA-008	PRoWs and Recreation	4. Please include Long Stratton FP3, Long Stratton FP4 and viewpoints associated with St Michael's Church within any accompanied site inspection, because the openness of the landscape, the relationship between the footpaths and surrounding countryside, and the contribution of the church as a local landmark can only be properly appreciated on site.	The Applicant refers to its response to EH-PDA-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
EH-PDA-009	PRoWs and Recreation	5. Please require the Applicant to identify the specific Development Consent Order (DCO) Requirement, certified plan or other provision that guarantees the proposed landscape mitigation and its long-term maintenance, rather than relying solely on future management commitments.	The Green Infrastructure Strategy [AS-005] includes 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] (which is a secured document) through a Requirement in the Draft DCO [AS-032] .
EH-PDA-010	PRoWs and Recreation Landscape and Visual	6. Please require the Applicant to provide visual and landscape information showing the expected effectiveness of screening and mitigation during winter and summer conditions, and at different stages of the scheme's lifetime.	The Applicant refers to its response to EH-PDA-005.
EH-PDA-011	PRoWs and Recreation	7. If important questions remain unresolved after the first round of written responses, please hold a hearing to discuss landscape, countryside and public rights of way impacts in more detail.	The Applicant notes this comment. Future Issue Specific Hearings on a variety of topics, including Landscape and Visual, Transport and Access (including recreation and PRoWs), and Ecology and Biodiversity, are anticipated to take place during the examination of the DCO application.
EH-PDA-012	Concluding Remarks	8. If significant new information is submitted later in the Examination, please ensure that Interested Parties have a fair opportunity to	The Applicant notes this comment. Interested Parties will have the opportunity to comment on the Application throughout the Examination at various Deadlines.

ID	Theme	Comments/Issues Raised	Applicant's Response
		comment on it before any conclusions are reached.	

Table 4.9 Karen Ward [\[PDA-041\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
KW-PDA-001	Human Health and Wellbeing	I do not feel that the due process has occurred in any part of the representation. Nor enough research as to the impact on people that this will have, including mental wellbeing.	Human health has been assessed in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] which considers human health in relation to transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects. Mental health has also been considered, as presented in the Equality Impact Assessment [APP-214]. The Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197], Outline OTMP [APP-202], Outline LEMP [APP-199], Outline PRoWPPMP [APP-203] and Outline ESSC [APP-205] outline measures taken 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]. With specific regard to community liaison, this is directly secured through Requirement 4 of the Draft DCO [AS-032] through the provision of a community liaison group. Its role will be to provide an accessible route for communicating information, raising Scheme-related concerns and receiving timely responses during construction. Clear and

ID	Theme	Comments/Issues Raised	Applicant's Response
			timely communication may help to reduce avoidable uncertainty associated with the works. The group would not provide clinical mental-health advice or replace existing health and support services.
KW-PDA-002	Ecology and Biodiversity	Not enough research into the massive impacts on nature and the environment-fragmentation of habitat, damage to rare wildlife, including Barbastelle bats.	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, reduce, mitigate or compensate for, through 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]. ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report

ID	Theme	Comments/Issues Raised	Applicant's Response
			[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.
KW-PDA-003	Water Environment Soils and Agricultural Land	The impact on water security, particularly given the high temperatures and ensuing drought and wildfires we have had; this also serves to highlight the impact on food security.	<u>Water Security</u> Water resources, including potable water supply for the Scheme, has been assessed within ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]. Tankering is considered to be the main option for water supply, as committed to in the Outline CEMP [APP-196] and Outline OEMP [APP-197]

ID	Theme	Comments/Issues Raised	Applicant's Response
			that are secured through Requirements 13 and 14 of the Draft DCO [AS-032]. Mitigation measures to protect waterbodies from pollution are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. The impacts on water supplies have been considered in ES Volume 1, Chapter 9 – Water Environment [APP-045] and ES Volume 1, Chapter 16 – Ground Conditions [APP-052] as 'Not Significant'. <u>Food Security</u> ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on food production and the rural economy. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely), particularly in the context that the amount of land within the Order Limits is approximately 0.22% of the land within Norfolk, and 1.2% of South Norfolk agricultural land. The UK Food Security Report concludes that food production levels could be maintained or moderately increased alongside the land use

ID	Theme	Comments/Issues Raised	Applicant's Response
			change required to meet net zero. The UK Solar Roadmap states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. At Paragraph 2.10.21, NPS EN-3 states that '<i>While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible</i>'.

Table 4.10 Katherine Hart [PDA-028]

ID	Theme	Comments/Issues Raised	Applicant's Response
KH-PDA-001	Opening Remarks	I live on Topcroft Street in Topcroft and I am concerned about the effect the East Pye Solar proposal could have on the village and on our day-to-day lives.	The Applicant notes this comment.
KH-PDA-002	Transport and Access	Traffic and road safety One of my biggest concerns is construction traffic. I appreciate that Topcroft Street is not shown as an official construction route, but it is a direct route from the B1332/Norwich Road through Topcroft. I therefore think it is important that the possibility of vehicles using local roads as a cut-through or alternative route is properly considered. The roads around Topcroft are typical country roads. They are narrow in places, have bends and limited passing places, and are used by walkers, cyclists and horse riders as well as local residents. I don't think you can fully appreciate what it is like for a large HGV to meet another vehicle, cyclist or horse on these roads just by looking at a map. I am concerned about the safety of people using the roads and	The Applicant acknowledges the concern that Topcroft may experience traffic impacts despite not hosting any Scheme infrastructure. ES Volume 2, Figures 11.2 – 11.8 – Likely and Suitable Routes to the Scheme [APP-095] identifies the proposed route to the Scheme. These figures show that construction traffic associated with the Scheme is not anticipated to route through Topcroft. Construction traffic would be required to use the designated routes identified within the application documents and managed in accordance with the Outline CTMP [APP-201]. Accordingly, construction traffic associated with the Scheme is not anticipated to route through Topcroft and direct traffic effects on the village are therefore not expected. Mitigation measures and management of traffic and access are set out in the Outline CTMP [APP-201] and Outline OTMP [APP-202] to minimise

ID	Theme	Comments/Issues Raised	Applicant's Response
		also about the effect on verges and road surfaces. There is also the noise and vibration from heavy vehicles to consider. If there are large numbers of vehicle movements over a long construction period, this would be more than just a minor inconvenience for people living here.	impacts as far as practicable. Detailed CTMP and OTMP will be submitted to and approved by the relevant planning authority in accordance with the Requirements of the Draft DCO [AS-032]. Construction vibration has been assessed in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], including consideration of construction activities and traffic where relevant. Construction works will be managed through the Outline CEMP [APP-196] and Outline CTMP [APP-201], with detailed controls secured prior to construction. These measures will manage construction activity and associated vehicle movements to avoid unacceptable vibration effects.
KH-PDA-003	Noise and Vibration	Noise and disturbance Topcroft is a quiet village, and that is one of the things that makes it a good place to live. I am concerned about the amount of noise and general disturbance that would come with the construction of a project of this size. There would be HGVs, deliveries and machinery, potentially for a considerable length of time. I am also concerned about the possibility of ongoing noise from things such as	The Applicant refer to its response regarding construction traffic noise and vibration under comment ID KH-PDA-002. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		inverters and substations once the site is operating. A low-level continuous noise might not sound significant on paper, but in a quiet rural area it can become very noticeable, especially in the evening and at night.	practicable. In addition, the following measures will apply: 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 $L_{A_r,Tr}$, 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 [EN0110114/EXAM/9.20] or 30 dB $L_{A_r,Tr}$, 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			exceed the background sound level or 30 dB $L_{A,T,r}$, whichever is higher. The detailed design will therefore be required to achieve the assessed and secured noise limits.
KH-PDA-004	Landscape and Visual	What happens to the countryside? I am also worried about the gradual change to the countryside around us. It isn't just the solar panels. There will be fencing, access tracks, substations and other equipment, and all of this changes the look and feel of the area. There are already a lot of renewable energy developments and other energy infrastructure being proposed across East Anglia. I think the Examining Authority needs to look at the bigger picture and consider what the combined effect of all this development is going to be on our countryside and rural communities.	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Furthermore, a visual amenity assessment of PRow is presented in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149] and a visual amenity assessment for residential properties in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]. Cumulative assessment is carried out in section 7.11 in Chapter 7. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212].
KH-PDA-005	Need	Does East Pye Solar actually need to happen?	The Applicant's Statement of Need [APP-206] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently

ID	Theme	Comments/Issues Raised	Applicant's Response
		I am not against renewable energy. I understand why we need to produce more energy from renewable sources. What I question is whether this particular development is necessary when East Anglia is already producing a very large amount of renewable energy and accommodating so much energy infrastructure. If the area is already making such a significant contribution, I think it is reasonable to ask what extra benefit East Pye Solar would actually provide and whether that benefit is enough to justify the damage and disruption it would cause. From where I live, it is difficult to see how the benefits can outweigh the impact on the countryside and the people who live here.	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 Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.8-3.2.9. The Applicant also refers to its response NEE-005 as set out in The Applicant's Response to Relevant Representations – By Theme [PDA-012]. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] are comprehensive and robust and the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. In the event of a conflict between the development plan and the NPS, the NPS prevails for the purpose of the Secretary of State decision making given the national significance of the Scheme. As set out at paragraph 10.1.4 of the Planning Statement

ID	Theme	Comments/Issues Raised	Applicant's Response
			[APP-209] <i>'...substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised significant beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training'</i>
KH-PDA-006	Concluding Remarks	Overall My concern is that the impact of this development is being looked at as a series of separate issues when, for people living locally, they all add up. It could mean more construction traffic, safety concerns, noise and vibration, disturbance and a further change to the rural character of the area. I would ask the Examining Authority to look carefully at the effect on villages such as Topcroft, including people who may not live next to a solar field but could still be affected by the wider construction and transport activity.	The Applicant notes this comment and refers to its response to KH-PDA-001 to KH-PDA-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
		I believe the benefits of East Pye Solar need to be weighed very carefully against the harm it could cause. I am not convinced that the additional benefit justifies the impact on our local community and countryside.	

Table 4.11 Keith John Bailey [PDA-043]

ID	Theme	Comments/Issues Raised	Applicant's Response
KJB-PDA-001	DCO Process	1. Purpose of this objection This representation is made on behalf of BEPS supporters to place on record a procedural objection to the adequacy and lawfulness of East Pye Solar Ltd's consultation and environmental assessment process to date, under the Planning Act 2008 (Sections 42–48, 55) and associated EIA Regulations 2017. It requests that the Planning Inspectorate does not accept any future DCO submission for East Pye Solar until the Applicant has demonstrated full statutory compliance.	The Applicant's position is that the ES [APP-036 to APP-195] for the Scheme is legally compliant with national policy. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] set out how the Scheme complies with relevant national and local planning policies.
KJB-PDA-002	Consultation and Engagement	2. Failure to undertake a valid consultation in accordance with the published SoCC The Applicant's Statement of Community Consultation (SoCC), published in June 2025, sets out how local communities would be consulted prior to DCO submission. However, the Targeted Consultation (22 Oct – 26 Nov 2025) introduces new and materially altered works – including substation land, access	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		routes, and extensive vegetation removal – without any updated or republished SoCC or any public notice under Section 47(6). No new SoCC notice has been identified in any statutory notice portal or on East Pye Solar's own website, confirming that the June 2025 SoCC remains the only version in force. This means that no legally compliant consultation has been undertaken for the new or changed development areas. Contravention: Sections 47(1), 47(6), 55(3)(e) of the Planning Act 2008.	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's targeted consultation was undertaken on a non-statutory basis and was therefore not subject to the requirements under Section 47 of PA2008 or the accompanying duty to prepare, publish and consult on a Statement of Community Consultation (SoCC). Notwithstanding, the Applicant did provide its approach to targeted consultation to host authorities (South Norfolk Council and Norfolk County Council), which is presented in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]. The approach document sets out how the targeted consultation will be undertaken, ensuring that the activities are relevant and proportionate in respect of the proposed changes, and undertaken in accordance with the principles and methods set out in the published SoCC (presented in Consultation Report Appendix 5: Statement of Community Consultation Materials [APP-029]). In determining how to consult on the localised changes the Applicant had regard to paragraphs 020 of the Planning Act 2008: Pre-application

ID	Theme	Comments/Issues Raised	Applicant's Response
			guidance for Nationally Significant Infrastructure Projects⁴⁹, which sets out: <i>“For any material change to a part of the proposed application where a project as a whole is not fundamentally changed... a bespoke and targeted approach to further consultation can be adopted, which can address the specific consultation obligations arising proportionately.</i> <i>“Targeted consultation can be statutory or non-statutory, or a combination of the two depending on whether new persons needing to be consulted under section 42 of the Planning Act have been identified, but such targeted consultation will not require the production of PEI provided proportionate and appropriate information on environmental implication of any changes, where necessary, is provided.”</i> In line with this guidance and the Applicant's commitments set out in the published SoCC, the approach taken for the targeted consultation was considered to be proportionate, given the scale and nature of each of the localised changes. A full re-consultation (in line with consultation under

⁴⁹ *Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects [Withdrawn July 2026]*
<https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects>

ID	Theme	Comments/Issues Raised	Applicant's Response
			Section 47 and section 48 at Statutory Consultation) was therefore not proposed.
KJB-PDA-003	Consultation and Engagement	3. Inadequate consultation with affected statutory and non-statutory consultees The Targeted Consultation has omitted or failed to re-consult key bodies and landowners newly affected by expanded infrastructure, including: • Civil Aviation Authority / GAAC (regarding proximity to Tibenham Airfield) • Local water-supply stakeholders and private well owners • Parish Councils newly impacted by revised haulage routes • Heritage and environmental consultees where new receptors have been introduced These omissions render the consultation procedurally defective under Section 42(1)(d) and Regulation 12(2)(a) of the EIA Regulations.	The Applicant refers to its response to KJB-PDA-002 regarding the adequacy of consultation. 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 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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.
KJB-PDA-004	EIA Methodology	4. Invalid and outdated environmental baseline data The PEIR and targeted materials continue to rely on ecological and environmental baseline surveys gathered prior to these changes. The Applicant has acknowledged that baseline data were not updated to reflect vegetation clearance, agricultural change, or altered site boundaries, contrary to Planning Inspectorate Advice Note Seven (EIA Scoping – para 3.9) and the EIA Regulations Reg. 14(2)(b). The new proposed haulage routes are unworkable due to weight limitations and impact seven Conservation Areas, the	In relation to the sufficiency and currency of surveys, the Applicant draws attention to Section 8.5 and Table 8.7 of ES Volume 1, Chapter 8 [APP-044] and the supporting technical appendices, including the Ecological Desk Study and Extended Habitat Survey [AS-017]. A comprehensive suite of baseline ecological surveys was undertaken between 2024 and 2026 in accordance with the CIEEM Guidelines for Ecological Impact Assessment (v1.3), the agreed EIA Scoping Opinion at ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114], and Natural England guidance. Construction vehicle routing has been developed in consultation with Norfolk County Council as the Local Highway Authority, with the principal aim of

ID	Theme	Comments/Issues Raised	Applicant's Response
		impacts on which have not been assessed. There is no updated traffic or road safety EIA update for any of these proposed new routes - one of which passes directly in front of a primary school, and the majority of which pass through or adjacent to Conservation Areas. Consequently, the consultation documents do not constitute valid 'environmental information' within the meaning of Regulation 3, invalidating the consultation as an EIA stage.	avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable, as set out in the Outline CTMP [APP-201]. Internal haul routes have been incorporated where practicable to minimise construction traffic effects on the Local Road Network. Site access design, swept-path analysis and visibility splays, alongside an AIL report are detailed in Appendix C and D of the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177]. The Transport Assessment [APP-174 to APP-177] was informed by the proposed access strategy.
KJB-PDA-005	Consultation and Engagement	No revised PEIR has been issued to outline impacts to the airfield, or residents of Great Moulton now that the infrastructure is significantly closer to the village.	The Applicant refers to its response to KJB-PDA-002 regarding the Planning Inspectorate's guidance on undertaking targeted consultations. As stated in the Targeted Consultation Information Change Note, presented in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033], the Applicant reviewed the additional areas and associated activities under consultation. These areas did not change the likely significant effects of the environmental impact assessment that were set out in the Preliminary Environmental Information Report (PEIR), the findings of which the Applicant sought views on during the statutory consultation. The Applicant also signposted to the

ID	Theme	Comments/Issues Raised	Applicant's Response
			chapters of the PEIR where readers could find the likely significant effects, including on Transport and Access. In its Application, the Applicant provided a High Level Investigative Report [APP-222] regarding the impacts of the Scheme to Tibenham Airfield. Furthermore, the Applicant has considered impacts on airfields in ES Volume 3, Appendix 18.1 Glint and Glare Assessment [APP-189]. The Applicant provided further information on aviation impacts in the Applicant's Position Statement on Aviation [PDA-006], which was submitted at Procedural Deadline A. ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] considers the landscape impact on Great Moulton.
KJB-PDA-006	Landscape and Visual	No updated visualisations, ZTVs or cumulative setting impacts have been provided, contrary to PINS direction.	Visualisation are presented in Appendix 7.6 Figure 7.6.1 to Figure 7.6.11 [APP-136 to APP-146]. ZTVs are presented in Figure 7.5.1 to Figure 7.5.11 [APP-070 to APP-080]. Cumulative assessment is carried out in section 7.11 in Chapter 7 – Landscape and Visual [APP-043].
KJB-PDA-007	Scheme Description	No updated environmental baseline for the major 400KV substation change has been provided.	ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear and accurate description of the Order Limits, including key

ID	Theme	Comments/Issues Raised	Applicant's Response
			environmental and planning constraints within and surrounding the Order Limits. A detailed description of the baseline conditions for each environmental topic is provided within the respective ES topic chapters [APP-042 to APP-056] . The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes.
KJB-PDA-008	Scheme Description	The document states 'the additional areas do not change the likely significant effects' of the PEIR EIA (which is materially untrue, particularly with regard to the higher infrastructure around Tibenham Airfield) but provided no evidence, no supporting assessment or matrices, breaching the 'proportionate but justified' EIA requirement.	See the Applicant's response to KJB-PDA-005 above.
KJB-PDA-009	Cumulative and In-Combination Effects	No updated cumulative impact assessment has been provided. Contravention: EIA Regulations 2017 – Regulations 3, 12, 14, 17.	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within ES Volume 1, Chapter 2 - EIA Methodology [APP-038] . ES Volume 3, Appendix 2.4 -Cumulative Schemes [APP-116] details the cumulative schemes considered within the ES. Each topic chapter within the ES [APP-042 – APP-054] sets

ID	Theme	Comments/Issues Raised	Applicant's Response
			out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or Scheme. A summary of all cumulative effects is provided within Table 20.4 of ES Volume 1, Chapter 20 - Summary of Residual Significant Effects [APP-056] .
KJB-PDA-010	Targeted Consultation	5. Failure to re-consult on material design changes Substantial design alterations have occurred since the PEIR consultation, including removal and re-routing of access corridors, new, enlarged grid-connection alignments, and significant vegetation removal works from approximately 26 sites. There is also no acknowledgement of the cumulative impact of Tasway Energy Park, which adjoins East Pye Solar at the existing Tasburgh solar fields, is under non-statutory consultation, and together would cover 6,500 acres of farmland with solar infrastructure. This omission is disingenuous as we have evidence that East Pye Solar is in discussion with Tasway Energy Park about sharing a grid connection at Great Moulton, which would significantly increase the infrastructure threatening the village and also aviation at Tibenham Airfield. The Applicant's claim	The Applicant refers to its response to KJB-PDA-010 regarding the adequacy of consultation and the approach taken for the targeted consultation. A comprehensive cumulative assessment (set out within each technical ES chapter [APP-042 to APP-054] and in-combination effects assessment (ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055]) has been undertaken in accordance with Planning Inspectorate guidance, as detailed within ES Volume 1, Chapter 2 – EIA Methodology [APP-038]. Two types of cumulative effects have been assessed in the ES: • In-combination effects – the inter-relationship between individual development effects on one particular receptor; and • Cumulative effects – multiple existing and/or approved developments generating additive

ID	Theme	Comments/Issues Raised	Applicant's Response
		that these changes are 'minor' is inconsistent with PINS Advice Note 16 (How to request a change to a DCO application – para 2.2) which defines 'material' changes as those introducing new or additional receptors or effects. As these design changes have not been consulted on in accordance with a republished SoCC, the consultation process fails the 'adequacy of consultation' test under Section 55(3)(e).	effects which together have an increased effect on the same receptors. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116] details the cumulative schemes considered within the ES. Each topic chapter within the ES [APP-042 to APP-054] sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or Scheme. A summary of all cumulative effects is provided within Table 20.4 of ES Volume 1, Chapter 20 – Summary of Residential Significant Effects [APP-056]. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the Scheme and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.
KJB-PDA-011	Consultation and Engagement	6. Deficiency in published information and accessibility The consultation documents, maps, and plans were unavailable in printed form at the opening of the consultation, breaching Section 48(2)(a) requirements for adequate publicity. Hard copies were not made available at all the locations named in the SoCC.. As a result, affected residents could not reasonably access the material, constituting a failure to give the public a fair opportunity to respond. Several villages leafleted for the targeted consultation, including Wacton and Aslacton, were not included in the original Statutory Consultation and therefore had no opportunity to consult on the project as a	The targeted consultation held by the Applicant requested community feedback on small additional parcels of land, as described in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]. The Applicant undertook a proportionate land referencing exercise in advance of the targeted consultation, using Land Registry records and questionnaire activities to identify parties with a legal interest in, or may be affected by, the additional land proposed to be included within the Order Limits. In addition to this, the Applicant wrote to all properties within its Statutory Consultation Core

ID	Theme	Comments/Issues Raised	Applicant's Response
		whole. This is also true of villages on the new haulage routes.	Consultation Zone (CCZ), presented in Chapter 7 of the Consultation Report [APP-024]. The Applicant considers that the land referencing and consultation processes were undertaken in accordance with established guidance and were proportionate to the nature and extent of the proposed amendments. <u>Hard copies of materials</u> 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. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
KJB-PDA-012	Consultation and Engagement	7. Request for PINS action BEPS supporters therefore respectfully request that the Planning Inspectorate: 1. Refuse to accept any DCO submission for East Pye Solar until the Applicant issues and publicises an updated SoCC and undertakes a full re-consultation under Sections 42 and 47. 2. Require the Applicant to provide updated and verified environmental baseline data in accordance with the EIA Regulations before resubmitting any EIA. 3. Treat any future 'Adequacy of Consultation' responses from local authorities as contested, and seek independent verification from PINS legal services.	The Applicant notes this comment. The acceptance of the Applicant's DCO application for Examination on 2 April 2026 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.
KJB-PDA-013	Consultation and Engagement	8. Conclusion This objection is not concerned with the planning merits of the proposal but with its procedural and legal compliance. Unless and until the deficiencies identified above are rectified, any subsequent DCO application would be invalid in law under Section 55(3)(e) of the Planning Act 2008	The Applicant notes this comment and refers to its previous responses on consultation and engagement in this table.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and Regulation 3 of the EIA Regulations 2017. Submitted respectfully on behalf of: BEPS – Residents' campaign group	
KJB-PDA-014	Battery Safety	Additionally I would personally offer the following objections: South Norfolk is being unfairly targeted by applications for solar farms, Battery Energy Storage Systems (BESS) and substations. It is obvious that the power generated and distributed is for use in London and prime agricultural land capable of providing food crops will be lost forever. Expert opinion states that even after these installations are removed the land will never be capable of supporting crops. The Russian / Ukrainian war has highlighted our dependence on grain imports from other countries and with the ever changing global power struggles, there must be a priority to preserve the UK ability to be as self-sufficient as possible.	The Statement of Need [APP-206] sets out the national need for the Scheme to contribute to meeting the Government's objective to ensure that the supply of energy always remains secure, reliable, affordable, and consistent with meeting the UK's legally binding target to cut GHG emissions to net zero by 2050. The BESS is proposed to support the operation of the principal solar site. 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. The Applicant also refers to its response NEE-005 as set out in The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]. The Outline SRMP [APP-204] and the Outline DEMP [APP-198] set out measures to ensure that soil profiles to be reinstated will be designed to

ID	Theme	Comments/Issues Raised	Applicant's Response
			ensure that soils/land would be restored to their previous condition as far as practicable
KJB-PDA-015	Soils and Agricultural Land	There are swathes of more suitable land along the Thames Estuary and at remote sites such as Foulness Island that should be considered in preference to quality farm land.	As set out within the Site Selection Assessment [APP-215] and Statement of Need [APP-206], the availability of a grid connection is a key factor in the siting of solar PV infrastructure, which is recognised in NPS EN-3 Paragraphs 2.10.16 and 2.10.17. The Applicant has accepted a Connection Offer from NESO to connect the Scheme to an existing part of the NETS which passes over the Site, via a new National Grid substation. This existing part of the NETS has sufficient capacity to transmit the energy the Scheme will generate to both local consumers and across the country where it is required. The Applicant has considered the availability of non-BMV land within a 20km radius from the Point of Connection within the Site Selection Assessment [APP-215].
KJB-PDA-016	Noise and Vibration	The proposed location of the National Grid substation is too close to a well populated residential area. In adverse weather conditions there will be an electrical discharge from the high voltage cables along with a low 'humming' from the transformers and associated equipment. This noise will be audible to a large	The primary cause of electrical noise emissions from transformers is magnetostriction. On this basis, weather conditions are not expected to affect noise emissions from transformers. The Applicant notes the concerns raised regarding substations, transformers and inverters. Noise from these elements of the Scheme have been

ID	Theme	Comments/Issues Raised	Applicant's Response
		number of residents and will be intolerable in hot weather when doors and windows are open especially in the dead of night.	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: 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 $L_{A,T,r}$, 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 [EN0110114/EXAM/9.20] or 30 dB $L_{A,T,r}$, whichever is higher. At all other receptors:

ID	Theme	Comments/Issues Raised	Applicant's Response
			- 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. The detailed design will therefore be required to achieve the assessed and secured noise limits.
KJB-PDA-017	BESS Safety	There are serious concerns about the ability to fight any fires emanating from the BESS sites. There is a lack of suitable fire fighting resources and more importantly a lack of natural water sources that could provide the tens of thousands of litres per hour necessary to fight a lithium-based BESS fire.	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. The detailed BSMP will be substantially in accordance with the Outline BSMP and will be discharged and approved by the relevant local authority.
KJB-PDA-018	Socio-Economics	The value of properties in Great Moulton has been decimated. A number of homes have been put up for sale, most achieve no viewings from prospective buyers. Any prospective sales are immediately	In relation to property value and the potential impact of the Scheme on the local economy and local businesses, the Applicant refers to its responses at SOC-001 and SOC-002 as set out in

ID	Theme	Comments/Issues Raised	Applicant's Response
		terminated when searches reveal the East Pye project. This blocks people who need to relocate to fulfil job offers and has a devastating impact on any elderly resident who needs to sell their home to meet residential care costs.	The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012].
KJB-PDA-019	Transport and Access	The access routes proposed to the sites are totally incapable of carrying the large number of heavy goods vehicles that will be required. Most of the highways are single track with few passing places, they are not designed for consistent heavy usage which will damage verges and road surfaces creating hazards for local drivers, walkers and cyclists.	The Applicant acknowledges the concerns raised regarding the suitability of local roads for construction traffic and the potential effects on other highway users. Vehicle tracking assessments were undertaken as part of the transport assessment process and informed the development of the access strategy and construction traffic routing arrangements. 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 CTMP [APP-201] , which includes traffic management and mitigation measures intended to minimise impacts on local roads and other users of the highway network.
KJB-PDA-020	Ecology and Biodiversity	There will be a detrimental effect on wildlife (of all types) and trees which will need felling to provide access routes.	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant

ID	Theme	Comments/Issues Raised	Applicant's Response
			Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID HePC-007, SPC-010, SPC-066, and BAPC-003.
KJB-PDA-021	Concluding Remarks	I would ask that this application be refused on the grounds it is totally inappropriate given all the above factors and that it should be refused.	The Applicant notes this comment.

Table 4.12 Loretta Dunmore [\[PDA-048\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
LD-PDA-001	Community Impact	My Speech – Community Wellbeing My name is xxxx, and I live in Great Moulton, within the immediate impact zone of the East Pye proposal. I want to speak about what these developments mean for daily life — in the quiet, ordinary routines that make up a person's week, and the very real harm already being felt across our villages. Over many months, we have faced consultation after consultation from energy companies — not just East Pye seeking land around our village — and the toll on residents has become impossible to ignore. This is not abstract concern; this is real harm being felt right now. One vulnerable gentleman, who has lived in his home since he was six months old, has been receiving up to four letters a week from Dalcour Maclaren, some addressed to his deceased parents. When he tried to explain his situation, he was dismissed so completely that he ended up	The Applicant recognises the seriousness of the experiences reported. These accounts have been treated as relevant qualitative evidence in the Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27] (see the Applicant's response to ISH1 Action Point 44), alongside the environmental assessment, consultation evidence and available population-health information. The Addendum consolidates and provides further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. It is intended to supplement, rather than replace, the assessments submitted with the Application. Its findings have been reported and, where necessary, additional mitigation or monitoring commitments have been identified for consideration through the Examination. The Applicant acknowledges the concerns raised regarding stress, anxiety and the potential effects of the Scheme on community wellbeing. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that large infrastructure projects can affect wellbeing through pathways

ID	Theme	Comments/Issues Raised	Applicant's Response
		in tears, shaking with distress and frustration at not being listened to. A woman recovering from a serious health condition, living in what she describes as a forever home. Her salvation through her illness and recovery has been summers watching and recording endangered Swifts nesting in her garden. With a BESS proposed at the bottom of it, those nesting boxes most likely will become empty. A resident of over 30 years cannot imagine life with a National Grid substation as her neighbour — the sense of intrusion is profound. Parents are frightened about potential health implications for their children. And many residents have a real fear of fire— living next to major electrical infrastructure in arable fields during hotter summers and increasing field fires. Residents who have fought this scheme for months on end are now mentally and emotionally burnt out. One elderly couple arrived at my door determined to stand up for their village. Days later, they returned sleep-deprived, shaken, and in tears — overwhelmed by fear and confusion.	such as perceived environmental change, disruption, uncertainty and concern about potential risks. It also recognises that older people and those with existing health conditions may be more sensitive to environmental change and temporary disturbance. In response to consultation feedback on these matters, an assessment of mental wellbeing and equality-related impacts was undertaken and is presented within the Equality Impact Assessment [APP-214]. On the basis of the Human Health Summary Statement and Equality Impact Assessment currently available, the Applicant has not identified a likely significant population-level health effect. The Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27] further tests and documents that conclusion in light of the evidence submitted during the Examination.

ID	Theme	Comments/Issues Raised	Applicant's Response
LD-PDA-002	Construction	Beyond these individual stories, there is the daily reality we all face. Our lives are built around work patterns, caring responsibilities, and the need to travel safely on narrow rural roads that often have no footpaths. The construction phase — with HGV movements, road closures, and diversions — would turn simple, essential journeys into stressful and unpredictable ones. These aren't optional trips. They're school runs, medical appointments, caring visits, work commutes — and essential shopping, because Great Moulton has no shop or post office. Every household relies on these roads for access to Diss. And while there are alternative routes, they are significantly longer, meaning more time, more fuel, and more expense.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic, temporary traffic management measures and diversions on local residents and their ability to undertake everyday journeys. The Applicant recognises that local communities rely on the local highway network to access employment, education, healthcare, shopping and other essential services. The transport effects associated with 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]. Construction traffic would be managed in accordance with the Outline CTMP [APP-201], which includes measures intended to maintain access and minimise disruption to local communities throughout the construction period.
LD-PDA-003	PRoWs and Recreation	And for rural communities like ours, Public Rights of Way are our parks. Great Moulton has no playground or formal green space. Our PRoWs are where we walk our dogs, where our children learn to ride their bikes, where we ride our horses, where residents take gentle daily exercise, and where we connect with the countryside that	The Applicant acknowledges the importance of Public Rights of Way to local communities and recognises that these routes are valued for recreation, access to the countryside and day-to-day wellbeing. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		supports our wellbeing. Closing or diverting these routes removes safe off-road access, forces pedestrians and riders onto construction roads, and cuts people off from the very landscape that defines village life. Hundred Lane and Narrowgate Way — medieval routes through the old village of Little Moulton, known locally as “The Sanctuary” — will be forever destroyed.	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 during construction, operation and decommissioning. Where temporary closures or diversions are required for safety reasons, these would be managed in accordance with the measures set out within the Outline PROWPPMP [APP-203]. The Applicant also notes that no permanent changes to Public Rights of Way are proposed as part of the Scheme and that, following the completion of construction works, access would be reinstated along the existing routes. The Applicant therefore does not agree that Public Rights of Way users would be permanently cut off from the wider network as a result of the Scheme.
LD-PDA-004	Noise and Vibration Air Quality	Noise, dust, and vibration may sound like technical matters, but they translate directly into sleep disruption, increased anxiety, and reduced ability to concentrate or work from home. And in rural communities like ours, most homes have open chimneys and traditional ventilation, meaning construction dust will enter living spaces. This is not hypothetical — it is unavoidable.	The construction vibration assessment results presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] outlines that one noise sensitive receptor (NSR29, commercial facilities on Bungay Road) is approximately 45 m from potential piling works, which would result in vibration levels approaching but not exceeding the SOAEL. At other receptors, construction activity will likely cause short term,

ID	Theme	Comments/Issues Raised	Applicant's Response
		For people with lung conditions, neurodivergence, or mobility challenges, these impacts are not minor inconveniences; they are significant barriers to daily functioning. Vibration from heavy plant and piling work also raises concerns for older properties with shallow or historic foundations — something that has not been assessed.	negligible to minor adverse effects, and are considered not significant. The dust risk assessment presented in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180] assesses the effects of dust emissions during construction, operation and decommissioning and considers all existing sensitive receptors, including residential properties, within 250 m of the Order Limits and 50 m of routes that will be used by construction vehicles in accordance with best practice guidance published by the Institute of Air Quality Management (IAQM). Appropriate mitigation measures, in accordance with the IAQM guidance, are set out in the Construction and Decommissioning Dust Assessment for inclusion in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Detailed versions of these management plans are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032] and will be substantially in accordance with the outline management plans. The potential for these effects to be experienced differently by more sensitive or vulnerable population groups has also been considered through the Human Health Summary Statement [APP-054] and the Equality Impact Assessment [APP-214]. This includes consideration of older

ID	Theme	Comments/Issues Raised	Applicant's Response
			people, children and young people, disabled and neurodivergent people, pregnant people, and people with existing physical or mental health conditions. The assessments recognise that some people may be more sensitive to noise, vibration, dust and air-quality effects, while concluding that, with the embedded and secured mitigation in place, no significant adverse effects are anticipated at the population or identified vulnerable-group level. The Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27] provides further consideration of these pathways, including the potential for short-term disturbance, stress or anxiety to be experienced by some individuals notwithstanding the population-level conclusions.
LD-PDA-005	Community Impact	And the long-term operational phase changes how we live. The loss of quiet rural character affects wellbeing, outdoor activity, and the sense of safety and connection that villages rely on. We are not talking about one substation — but three: the National Grid substation, the project substation, and the BESS compound. The combined operational noise, low-frequency hum, and vibration will permanently alter the acoustic environment of our homes and gardens. When a landscape becomes	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

ID	Theme	Comments/Issues Raised	Applicant's Response
		industrialised, people feel pushed out of their own environment. This is the quiet unravelling of community wellbeing. These proposals may be described as infrastructure projects, but it is our villages carrying the psychological burden. People feel unheard, unseen, and disposable. These proposals are not landing on blank ground. They are landing on people's lives — on memories, routines, and the sense of safety that underpins wellbeing. Communities cannot be expected to absorb this level of distress without consequence. This is not just about planning policy. It is about people, mental health, and justice. I ask the Planning Inspectorate to consider not only the technical evidence, but the human cost — because it is already being paid.	practicable. In addition, the following measures will apply: 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 [EN0110114/EXAM/9.20] 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			concludes that low frequency sound levels at the above receptors are below the NANSR45 criterion and therefore require no modification to the outcome of significance. Potential effects on mental health and community wellbeing have also been considered through the Human Health Summary Statement in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054], the Equality Impact Assessment [APP-214] and the Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27]. These assessments consider how operational noise and wider environmental change may affect residential amenity, enjoyment of homes and outdoor spaces, tranquillity, attachment to place, perceptions of safety and community cohesion. They also recognise that some people and population groups may be more sensitive to these changes. The technical noise conclusions do not, in themselves, represent separate conclusions on mental health and wellbeing. However, subject to the detailed design achieving the assessed and secured noise limits, no likely significant adverse effect on mental health and wellbeing is anticipated at population or identified vulnerable-group level through the operational noise pathway. This does not mean that no individual may experience

ID	Theme	Comments/Issues Raised	Applicant's Response
			concern, annoyance, anxiety or reduced enjoyment of their home or local environment.

Table 4.13 Mandy Ramm [\[PDA-051\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
MR-PDA-001	Opening Remarks	I request a site visit to my home, [REDACTED]. East Pye has failed to provide the precise location of the Project Substation and its exact distance from my home. All 3 of us in this household are in fulltime work. The timing of the hearings prevents us from attending in person which we believe is unfair. Extra hearings should be arranged to allow our direct participation.	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 Applicant notes the Interested Party's comments regarding the timing of the examination hearings. The dates, times and agenda for the hearings are determined by the Examining Authority and administered by the Planning Inspectorate as part of the examination process. The Applicant does not determine the scheduling of the hearings. The Applicant further notes that recordings and transcripts of all hearings are made available on the Planning Inspectorate's project webpage following each hearing. These provide a complete record of the proceedings and enable Interested Parties to review the discussions, submissions and questions raised during the hearing, including where they are unable to attend in person. In addition, Interested Parties are able to participate in the examination through written

ID	Theme	Comments/Issues Raised	Applicant's Response
			submissions in accordance with the procedural deadlines set by the Examining Authority. The Applicant therefore considers that opportunities remain available for Interested Parties to engage with and review the examination process, irrespective of their availability to attend a specific hearing session.
MR-PDA-002	Landscape and Visual	JOINT PERSONAL IMPACT STATEMENT Objection to East Pye Solar DCO Application EN0110014 Submitted by: Mandy Ramm — resident since 2014 David George — resident since 2014 Steven Dunnell — resident since 2022 Address: [REDACTED] Tivetshall St Margaret [REDACTED] 1. OUR HOME AND WHY WE OBJECT We are the residents of [REDACTED], Tivetshall St Margaret.	The Applicant notes these comments and has provided responses to each point raised below.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Mandy Ramm and David George have lived at the property since 2014, and Steven Dunnell has lived here since 2022. We are submitting this joint statement to explain the personal impact that the proposed East Pye Solar project would have on our home, our daily lives and our quality of life. We want to make clear that we are not opposed to renewable energy in principle. We understand the need to increase renewable electricity generation, improve energy security and reduce carbon emissions. Our objection is specifically to the scale, location and nature of the East Pye development, and particularly its proximity to our home and the transformation it would cause to the rural environment in which we live. For us, East Pye is not simply a development shown on a plan. It would change the place we have called home for many years.	
MR-PDA-003	Landscape and Visual	2. OUR RURAL OUTLOOK IS PART OF OUR HOME	The Applicant recognises that individual resident's values existing views and the rural character of the

ID	Theme	Comments/Issues Raised	Applicant's Response
		One of the things we value most about living at Fernleigh Cottages is the rural outlook and countryside surrounding our home. This is not an occasional view that we see only when passing through the area. We experience the surrounding landscape from our bedrooms, our kitchen and our garden. The rural setting is therefore an important part of our everyday lives and our enjoyment of our home. The countryside provides us with a sense of openness, peace and tranquillity. Our garden gives us somewhere to relax and enjoy the outdoors, including spending time there with our pets. We are deeply concerned that this environment could be replaced or dominated by a large-scale energy development consisting of extensive solar arrays, battery storage and associated electrical infrastructure.	area. The likely effects on landscape character and visual amenity are assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The mitigation hierarchy has been applied throughout the design process to avoid, reduce and mitigate landscape and visual effects where practicable. This includes the retention and reinforcement of existing hedgerows, tree belts and other landscape features, together with the provision of new planting through the Green Infrastructure Strategy [AS-005] and Outline LEMP [APP-199]. The Applicant considers that these measures provide an appropriate balance between reducing visual effects and maintaining the defining characteristics of the local landscape. The Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 [APP-148]. The RVAA has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). No properties were identified to meet the RVA threshold.
MR-PDA-004	Landscape and Visual	3. THE IMPACT ON OUR ENJOYMENT OF OUR HOME	The Applicant acknowledges the concerns raised regarding the perceived change to the character of the surrounding landscape and the potential effects

ID	Theme	Comments/Issues Raised	Applicant's Response
		Mandy and David have lived at [REDACTED] since 2014, meaning that the existing rural environment has been part of their lives for more than a decade. Steven has also established his home here since 2022. The East Pye proposal would fundamentally change the surroundings that we see and experience every day. The prospect of looking from our home and garden towards extensive solar panels, fencing, access tracks, substations, electrical equipment and battery storage infrastructure is extremely concerning. This is not simply about losing a pleasant view. It is about losing part of the character, tranquillity and sense of place that makes our house our home.	on residential amenity. The Applicant recognises that individual residents may value existing views and the rural character of the area. The likely effects on landscape character and visual amenity are assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The mitigation hierarchy has been applied throughout the design process to avoid, reduce and mitigate landscape and visual effects where practicable. This includes the retention and reinforcement of existing hedgerows, tree belts and other landscape features, together with the provision of new planting through the Green Infrastructure Strategy [AS-005] and Outline LEMP [APP-199]. The Applicant considers that these measures provide an appropriate balance between reducing visual effects and maintaining the defining characteristics of the local landscape.
MR-PDA-005	Landscape and Visual	4. OUR GARDEN AND PETS Our garden is an important part of our home and somewhere we regularly spend time with our pets. We value being able to enjoy the garden in a peaceful rural setting.	The Applicant notes the concern regarding the impacts of construction activity. The likely significant effects of the Scheme on nearby residential receptors during construction have been assessed in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] and ES Volume 1, Chapter 13 – Air Quality [APP-049], with a

ID	Theme	Comments/Issues Raised	Applicant's Response
		We are concerned that construction activity, heavy vehicles, machinery, noise, dust and prolonged disturbance could significantly affect our enjoyment of the garden and the environment in which our pets live. We appreciate that pets are not a conventional planning consideration in their own right. Nevertheless, they are part of our household and their welfare and behaviour are naturally important to us. The prospect of prolonged construction activity and the permanent presence of a major energy development close to our home is therefore a genuine personal concern.	construction dust risk assessment provided in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180]. Human health, wellbeing and amenity considerations are further addressed within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and the Equality Impact Assessment [APP-214]. The construction phase will be temporary in nature. Construction works will be controlled through the Outline CEMP [APP-196], which includes good practice measures to manage noise and disturbance. The detailed CEMP will be prepared prior to construction and will include appropriate controls for works near sensitive receptors. Mitigation and control measures for dust and vehicle emissions are provided in the Outline CEMP [APP-196] in accordance with best practice guidance.
MR-PDA-006	Battery Safety Major Accidents and Disasters	5. OUR CONCERNS ABOUT THE BATTERY ENERGY STORAGE SYSTEM We are particularly concerned about the proposed Battery Energy Storage System (BESS). A large-scale BESS is very different in character from solar panels alone. It involves substantial battery and electrical	A BESS Fire Emissions to Air Risk Assessment (Plume Study) has been undertaken to understand the potential air quality impacts of emissions to air released during a BESS fire. This assessment is presented in Appendix B of the Outline BSMP [APP-200] and has been used to inform emergency response mitigation measures presented in the Outline BSMP [APP-200].

ID	Theme	Comments/Issues Raised	Applicant's Response
		equipment together with cooling, ventilation, fire detection, safety and associated infrastructure. We recognise that the applicant has proposed safety measures and emergency procedures. However, those measures do not remove our concerns about having such infrastructure close to our home. In particular, we are concerned about the potential consequences of a serious battery incident involving fire, smoke or the release of hazardous substances, together with the resulting need for emergency response. We understand that the applicant may consider such an event unlikely. Nevertheless, the potential consequences are something that we, as nearby residents, would have to live with. We are also concerned about the practical challenges of emergency access and response in a rural location, particularly if an incident were to occur during construction, at night, in poor weather or	The Plume Study demonstrates that there are predicted to be no significant impacts on any sensitive residential receptor locations within 1km of the BESS compound in the event of a BESS fire. The Plume Study identified three PRoW that may need to be temporarily closed in the event of a BESS fire. These are Tivetshall St Margaret Footpath 3 located 60m east, Great Moulton Restricted Bridleway 18 approximately 90m north-east, Great Moulton Restricted Bridleway 19 approximately 40m north of the BESS Unit locations based on the indicative BESS layout. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail.

ID	Theme	Comments/Issues Raised	Applicant's Response
		when local roads were affected by project traffic. We believe our concerns about the proximity of the BESS to residential properties should therefore be given proper consideration.	
MR-PDA-007	Construction	6. CONSTRUCTION DISTURBANCE We are also concerned about the construction phase. A development of this scale would involve substantial construction activity, including heavy vehicles, deliveries, machinery, earthworks, access works, cabling and installation of electrical infrastructure. We are concerned about the effects on our home and daily lives, including: • construction traffic; • heavy vehicles using local rural roads; • noise and machinery; • dust and dirt; • disruption to journeys; • disturbance in our garden; • disturbance affecting our pets; and • the loss of the peace and tranquillity we currently enjoy.	Traffic effects, including cumulative effects, have been assessed within ES Volume 1, Chapter 11 – Transport and Access [APP-047]. The results of this assessment conclude that, with the proposed management and mitigation in place, effects on the highway network for construction traffic, and including cumulative development traffic, would not be significant. Construction traffic routeing, AIL movements, associated mitigation and traffic management measures are set out alongside an indicative construction programme within the Outline CTMP [APP-201]. A detailed CTMP, substantially in accordance with the Outline CTMP [APP-201], will be secured through the Requirements of the Draft DCO [AS-032] and approved in consultation with the relevant authorities prior to construction. Air quality effects resulting from road traffic emissions during the construction phase have been assessed within ES Volume 1, Chapter 13 – Air Quality [APP- 049] in accordance with EPUK

ID	Theme	Comments/Issues Raised	Applicant's Response
		Even though construction impacts may be described as temporary, a project of this scale could result in significant disruption over a prolonged period.	& IAQM guidance. An assessment of the risk of construction dust impacts to determine appropriate mitigation for inclusion in the Outline CEMP [APP-196] is provided in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment. Mitigation to control dust emissions during construction are provided in the Outline CEMP [APP-196]. Noise and vibration effects from construction are assessed within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Mitigation to control noise and vibration during construction are provided in the Outline CEMP [APP-196]. A detailed CEMP, to be substantially in accordance with the Outline CEMP, is secured by Requirement 13 of the Draft DCO [AS-032]. The potential for construction activity to affect residential amenity, daily routines and wellbeing has also been considered through the Human Health Summary Statement [APP-054], the Equality Impact Assessment [APP-214] and the Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27]. These assessments recognise that construction traffic, noise, vibration, dust, temporary access changes and the combined experience of environmental disturbance may affect the enjoyment of homes, gardens, local roads and recreational routes and may contribute

ID	Theme	Comments/Issues Raised	Applicant's Response
			to short-term disturbance, stress, anxiety or reduced enjoyment of the local environment for some individuals. The assessments also recognise that these effects may be experienced differently by particular population groups, including older people, children and young people, disabled and neurodivergent people, carers, pregnant people, and people with existing physical or mental health conditions. The potential interaction of construction effects has therefore been considered, rather than relying solely on the conclusions of each technical topic in isolation. These matters will be managed through the secured construction controls identified above, together with measures addressing working practices, construction traffic, dust, noise, access and communication with affected communities. While it is recognised that some individuals may experience temporary and localised disturbance during construction, the assessments conclude that, with the embedded and secured mitigation in place, no likely significant adverse effects on population health and wellbeing, or at identified vulnerable-group level, are anticipated. This conclusion does not imply that no individual disturbance or concern may arise during the construction period.

ID	Theme	Comments/Issues Raised	Applicant's Response
MR-PDA-008	Lifespan	7. THE CHANGE WOULD LAST FOR DECADES Mandy and David have lived at Fernleigh Cottages since 2014. Steven has lived here since 2022. We have each therefore experienced and become accustomed to the existing rural environment. The proposed development would then remain in operation for many decades. This means that the change is not something we could reasonably regard as a short-term inconvenience. The landscape and environment that Mandy and David have known since 2014, and that Steven has known since 2022, could become fundamentally different for a substantial part of our future lives.	The operational life of the Scheme is provided in ES Volume 1, Chapter 4 - The Scheme [APP-040], which states that the construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months and that the operational life of the Scheme is anticipated to be 60 years. 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. ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] has considered effects assessed at construction, Year 1 of operation, Year 15 of operation (once landscape planting has sufficiently matured) and decommissioning phases. Decommissioning is secured via the Draft DCO [AS-032], with decommissioning arrangements and likely mitigation described in the Outline DEMP [APP-198].
MR-PDA-009	Landscape and Visual	8. SCREENING CANNOT RECREATE THE EXISTING ENVIRONMENT	The Applicant acknowledges that mitigation will not remove all effects on landscape and visual

ID	Theme	Comments/Issues Raised	Applicant's Response
		We recognise that landscaping and screening are proposed. However, new planting takes years to mature. Even when mature, planting cannot recreate the existing open agricultural landscape or remove the underlying presence of a major energy development. For us, mitigation is therefore not the same as removing the impact. The development would still exist behind the screening, together with its associated infrastructure and operational requirements.	receptors. The Year 15 effects, following the establishment of landscape mitigation, are assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The mitigation hierarchy for landscape and visual amenity has been applied throughout the design of the Scheme and the landscape and visual impacts have been minimised as far as practicable. The Green Infrastructure Strategy [AS-005] has sought to balance the requirements for visual screening against the defining visual qualities of the landscape. 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].
MR-PDA-010	Assessment	9. THE APPLICANT'S OWN EVIDENCE We are particularly concerned that the applicant's own environmental documentation recognises significant effects associated with residential properties in the Station Road area.	The Applicant agrees that residential receptors at Station Road have been identified and assessed as part of the Environmental Impact Assessment process. This is entirely consistent with the purpose of the Landscape and Visual Impact Assessment (LVIA), presented in in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043],

ID	Theme	Comments/Issues Raised	Applicant's Response
		The applicant has identified a Station Road residential viewpoint in its visual assessment and has assessed residential receptors in this area as being particularly sensitive. The project's documentation also identifies nearby residential properties in relation to the proposed BESS. This is important because it demonstrates that the relationship between the development and nearby homes is not merely a concern raised by residents. The potential impact on residential properties has been recognised within the applicant's own assessment.	which are specifically intended to identify and evaluate potential effects on sensitive visual receptors, including nearby residents. This demonstrates that the Applicant has undertaken a comprehensive and proportionate assessment of those receptors most likely to experience visual effects. Significant visual effects are identified at VL9/BESS Property at Station Road at all phases of the development. The mitigation hierarchy for landscape and visual amenity has been applied throughout the design of the Scheme and the landscape and visual impacts have been minimised as far as practicable. The Green Infrastructure Strategy [AS-005] has sought to balance the requirements for visual screening against the defining visual qualities of the landscape. 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	Comments/Issues Raised	Applicant's Response
			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.
MR-PDA-011	Community Impact	10. WHAT OUR HOME MEANS TO US After many years living at [REDACTED], this is much more than simply an address to us. It is our home. We have enjoyed the rural surroundings, our garden and the views from our bedrooms and kitchen. We are concerned that East Pye would fundamentally change those everyday experiences. We accept that landscapes can change and that development is sometimes necessary. However, we believe there must be a reasonable balance between national infrastructure requirements and the quality	The Applicant acknowledges concerns regarding the importance of residents' homes, views and the contribution of the rural environment to wellbeing. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that landscape character and visual amenity can influence wellbeing through sense of place, connection to nature and people's experience of their surroundings. It also recognises that changes to landscape and views may affect nearby residents and users of recreational routes. The assessment identifies that landscape and visual effects would occur during construction and operation, particularly for receptors located in close proximity to the Scheme. However, it concludes that these effects would generally reduce over time as landscape mitigation establishes and planting matures.

ID	Theme	Comments/Issues Raised	Applicant's Response
		of life of the people who live immediately alongside that infrastructure.	The ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and the Human Health Summary Statement concludes that, whilst landscape character and visual amenity represent a pathway through which wellbeing effects could occur, the Scheme is not anticipated to result in significant adverse long-term effects on human health. Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 [APP-148], has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). No properties were identified to meet the RVA threshold. The Applicant acknowledge that there will likely to be visual effect on some residential properties outside of the 100m RVAA study area. These are assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] through representative view location from publicly accessible location.
MR-PDA-012	Concluding Remarks	11. OUR PERSONAL OBJECTION	The Applicant has considered the Conclusion in full and has responded to the substantive matters

ID	Theme	Comments/Issues Raised	Applicant's Response
		Our objection is therefore based on the real and personal impact that East Pye would have on our household. We are concerned about: • the loss or significant alteration of rural views from our bedrooms; • the loss or significant alteration of rural views from our kitchen; • the impact on the outlook from our garden; • loss of tranquillity and rural character; • construction noise, traffic, dust and disruption; • disturbance affecting our enjoyment of our home and garden; • the potential impact of construction activity on our pets; • concerns about living close to the proposed BESS, including fire and emergency-response risks; • the permanent industrialisation of the surrounding landscape; and • the prospect of living with these changes for decades. These impacts would not be experienced once.	raised in the relevant sections (MR-PDA-001 to MR-PDA-011) above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		We would experience them day after day, year after year, from the place we call home.	
MR-PDA-013	Concluding Remarks	<i>Applicant's Note:</i> <i>The Conclusion summarises and reiterates matters raised earlier in the submission. To avoid duplication, it has not been reproduced here.</i>	The Applicant has considered the Conclusion in full and has responded to the substantive matters raised in the relevant sections (MR-PDA-001 to MR-PDA-011) above.

Table 4.14 Martin Chandler [PDA-024]

ID	Theme	Comments/Issues Raised	Applicant's Response
MC-PDA-001	Book of Reference	I wish to comment on the draft Examination Timetable and also place on record an outstanding matter concerning my potential Category 3 status. I wish to draw the Examining Authority's attention to an outstanding matter concerning my property, [REDACTED]. I have formally requested that East Pye Solar identify me and my property as Category 3 Affected Person. My property is approximately 11m from the Order Limit, 42m from the nearest proposed solar PV array and approximately 394m from the proposed 400kV substation (as measured from AS-003 Land Pla) in relation to potential compensation arising from the proposed development. I have made several formal written requests for confirmation, but have received no substantive response. The Applicants Environmental Statement Chapter 12 states distances from the various proposed works that would be considered as affected. If these distances were applied correctly, my property would	The Applicant notes the Respondent's request to be identified as a Category 3 interest. In preparing the Book of Reference [APP-022], the Applicant undertook a detailed assessment of all land interests that may be affected by the Scheme, drawing on land referencing investigations, environmental assessments and other relevant project information. This assessment was carried out in accordance with the requirements of the Planning Act 2008. Assessment of noise and vibration effects are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment of noise and vibration uses representative noise-sensitive receptors within the study area where a receptor or receptor group is capable of representing other properties subject to comparable or lower exposure. For construction noise, a 300 m study area has been adopted from the closest point of construction activity, rather than the order limits. For example, for site compound works, impacts at only NSR29 are considered, as other receptors fall outside the study area. However, for solar PV piling works, the impacts at NSR28, NSR29, NSR30, NSR31,

ID	Theme	Comments/Issues Raised	Applicant's Response
		be well within these limits. I appreciate that the Examining Authority is not responsible for determining individual compensation claims. However, I ask that this matter is noted as part of the examination record and that the applicant's approach to identifying potentially compensable interests is properly addressed, along with the approach taken to ensure that all affected properties as defined by the Applicants definitions have been included and assessed correctly. Please could the Examination Authority also include whether my property has been considered for inclusion in the Book of Reference and, if not, the basis for its exclusion.	NSR32 and NSR34 were considered. The impacts and effects presented are expected to be lower at greater distances away from the works. In relation to vibration impacts during solar PV piling, the nearest receptor identified is NSR29, where impacts are low, resulting in a minor adverse significance which is not significant. Anticipated vibration levels due to construction works at differing distances are presented within ES Volume 2, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. For operational noise, the assessment methodology states that impacts are reported at the nearest or otherwise worst-affected receptor, because receptors farther from the relevant source would ordinarily experience lower noise levels and impacts. In relation to Site 5, residential receptors NSR28, NSR31, NSR32, NSR33 and NSR35 have been assessed. These receptors are representative of those nearest Site 5. At all these receptors during the daytime, evening, night-time and early morning, the impact is anticipated to be negligible, which results in a negligible significance, which is not significant. Daytime, night-time and early morning impacts and effects are detailed in ES Volume 1, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. Evening impacts and

ID	Theme	Comments/Issues Raised	Applicant's Response
			effects are detailed in the Evening Noise Assessment [EN0110014/EXAM9.20]. On the basis of that assessment, the Applicant concluded that the Respondent does not meet the statutory definition of a Category 3 person. Accordingly, the Respondent has not been included within the Book of Reference [APP-022] as a Category 3 party. The Applicant remains satisfied that the Book of Reference [APP-022] has been prepared appropriately and accurately identifies those persons who, based on the evidence available, meet the relevant statutory criteria.

Table 4.15 Melanie Barrow [\[PDA-071\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
MB-PDA-001	Opening Remarks	I am writing as a resident of Great Moulton and surrounding villages to formally object to the proposed expansion of energy infrastructure associated with the East Pye Solar development.	The Applicant welcomes your comments.
MB-PDA-002	Scheme Description	The location of the National Grid Substation, the increase in size and height of the East Pye Project Substation, the siting of the BESS Substation, and the inclusion of Battery Energy Storage Systems represent an unacceptable and irreversible industrialisation of our rural environment. I find the following elements wholly unacceptable and deeply troubling:	See the Applicant's response to GMAG-124 within The Applicant's Response to Relevant Representations - Part 3 [PDA-010] regarding industrialisation.
MB-PDA-003	Project Substations	Three Substations within the Same Locality: There are now three distinct substations proposed within the same locality: the National Grid Substation (for which no detailed plans, footprint, height, or function have been disclosed); the East Pye Project Substation (expanded from 132kV to 400kV and increased in height to 13 metres); and the BESS Substation	The two options for the location of the National Grid Substation were presented at Statutory Consultation and the preferred location at the Targeted Consultation in Autumn 2025. The Targeted Consultation also confirmed the location and size of the Project Substation in Sub-Site 1B, including the proposal to increase from 132kV to 400kV and the change in height from 7m to 13m. As stated in the Targeted Consultation Information

ID	Theme	Comments/Issues Raised	Applicant's Response
		(associated with the battery energy storage system). The National Grid Substation remains entirely unexamined—no PEIR review, no visual impact assessment, and no public scrutiny. This omission is glaring and unacceptable. The cumulative impact of three industrial-scale substations concentrated in a single rural area has not been properly assessed and cannot be dismissed as minor.	Change Note, presented in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033], the Applicant reviewed the additional areas and associated activities under consultation. These areas did not change the likely significant effects of the environmental impact assessment that were set out in the Preliminary Environmental Information Report (PEIR), the findings of which the Applicant sought views on during the statutory consultation. The Applicant also signposted to the chapters of the PEIR where readers could find the likely significant effects The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 –The Scheme [APP-040], which includes all components of the Scheme, including the Project Substations and National Grid Substation. The assessments within the ES therefore consider the effects of the Scheme as a whole, including the National Grid Substation, rather than individual elements in isolation. The parameters of the Project Substations and National Grid Substation are set out in the Design Principles, Parameters and Commitments [APP-213] and assessed as part of the Scheme within the ES [APP-036 to APP- 195], including an assessment of landscape and visual effects in ES

ID	Theme	Comments/Issues Raised	Applicant's Response
			Volume 1, Chapter 7 – Landscape and Visual [APP-043].
MB-PDA-004	Scheme Description	Increased Pylon Height: Infrastructure will now be visible across multiple villages, with new towers reaching up to 61 metres—far exceeding the existing 53-metre structures.	The concern is noted. The visual effect of the Proposed Pylons and long-distance receptors are assessed in Chapter 7 Landscape & Visual [APP-043]. Significant effects are not identified for view location over 1km away from the Scheme (VL5-7/ Site 1). A comparison ZTV is presented in Sheet 5 of ES Volume 2, Figure 7.5.10 - Site 1 Zone of Theoretical Visibility [APP-079], the Increased Visibility based on the Scheme's pylon height compared to existing Pylon's visibility is negligible.
MB-PDA-005	Scheme Description	Additional Land Use: Parcels such as Site 1D (north-east of Site 1) and Site 1C (south-west of Site 1) have been added without PEIR review, expanding the development footprint and intensifying landscape and local disruption.	The Order Limits were altered to include additional land to the northeast and southwest of Sub-Site 1B owing to the development of the concept design to accommodate Grid Connection Infrastructure, as presented at the targeted consultation. This is shown on ES Volume 2, Figure 5.3 -Alternations to Site Boundary between Scoping and PIER [APP-064]. As stated in the Targeted Consultation Information Change Note, presented in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033], the Applicant reviewed the additional areas and associated activities under consultation.

ID	Theme	Comments/Issues Raised	Applicant's Response
			These areas did not change the likely significant effects of the environmental impact assessment that were set out in the Preliminary Environmental Information Report (PEIR), the findings of which the Applicant sought views on during the statutory consultation. The Applicant also signposted to the chapters of the PEIR where readers could find the likely significant effects.
MB-PDA-006	Transport and Access	Highway Visibility Splays and AIL Accommodation: Additional land has been acquired throughout the Scheme to accommodate highway visibility splays and Abnormal Indivisible Loads (AILs). This includes potential removal of vegetation and street furniture such as benches, bins, and bollards, as well as temporary road alterations. Notably, the newly completed Hempnall roundabout is now at risk of destruction to accommodate AIL turning movements—an unacceptable waste of public funds and a disruption to local infrastructure. These changes will damage the character and safety of local roads, create congestion on the A140, and significantly affect commuters travelling to and from Norwich.	The Applicant acknowledges the concerns raised regarding highway alterations associated with Abnormal Indivisible Load (AIL) movements. The AIL routeing strategy was developed with input from a specialist AIL transport consultant experienced in the movement of AILs. The Outline CTMP [APP-201] sets out the framework for the management of AIL movements during construction. Temporary measures may be required in certain locations to facilitate the safe passage of AILs. Where temporary alterations to highway infrastructure are required, the affected area would be reinstated following completion of the AIL movement and returned to its previous condition. The Applicant therefore does not agree that temporary measures required to facilitate AIL movements would result in permanent changes to the local highway network. Construction traffic and

ID	Theme	Comments/Issues Raised	Applicant's Response
			ALL movements would be managed in accordance with the measures set out within the Outline CTMP [APP-201] .
MB-PDA-007	Noise and Vibration Air Quality	Noise, Dust, and Air Pollution: These impacts will persist not only during construction but throughout long-term operations, affecting residents' health and quality of life. According to National Grid Technical Guidance Note 287, noise from substations—particularly from transformers and cooling systems—can be audible up to 1 kilometre away. This is especially concerning given the proximity of homes, schools, and community spaces to the proposed infrastructure. No acoustic modelling, bunding, or mitigation has been proposed, despite National Grid's own recommendation to consider such measures near residential areas. In addition,	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: 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. The detailed design will therefore be required to achieve the assessed and secured noise limits. The dust risk assessment presented in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180] assesses the effects of dust emissions during construction, operation and decommissioning. Appropriate mitigation measures, in accordance with best practice guidance published by the Institute of Air Quality Management (IAQM) are set out in the Construction and Decommissioning Dust Risk Assessment for inclusion in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Detailed versions of

ID	Theme	Comments/Issues Raised	Applicant's Response
			these management plans are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032] and will be substantially in accordance with the outline management plans. The air quality impacts of road traffic emissions associated with the Scheme during construction and decommissioning have been determined to be 'negligible' in ES Volume 1, Chapter 13 - Air Quality [APP-049]. Assessment of air quality impacts associated with operational road traffic emissions was scoped out of the ES, as agreed through EIA scoping and consultation, on the basis that operational road traffic emission impacts would not be significant given the limited number of vehicle movements predicted. This is confirmed in ES Volume 1, Chapter 13 - Air Quality [APP-049] which refers to the predicted operational vehicle movements provided in the Outline OTMP [APP-197].
MB-PDA-008	Ecology and Biodiversity Arboriculture	National Grid infrastructure requires permanent access routes and safety clearance zones that may restrict public access to footpaths, bridleways, and farmland. These zones can result in fencing, signage, or land sterilisation near residential areas. The same guidance also warns against planting trees or hedgerows	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID BAPC-003, HePC-007, SPC-010, SPC-066, and BAPC-003.

ID	Theme	Comments/Issues Raised	Applicant's Response
		near substations due to fire risk and equipment interference—meaning that any removed vegetation may not be replaced, resulting in permanent landscape loss and reduced ecological value .	It is noted that there will be permanent change in land use and change in landscape character at the National Grid Substation parameter. The effect of these change on landscape and visual terms are assessed in ES Volume 1, Chapter 7- Landscape and Visual [APP-043]. Significant effects are identified associated with the National Grid Substation. The maximum parameters of the National Grid Substation includes offset away from the mitigation planting. 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].
MB-PDA-009	Transport and Access	Traffic and Safety Risks: Construction traffic will place unsustainable pressure on narrow rural lanes, especially Frith Way and Lodge Road—single-lane carriageways not built to withstand heavy lorries.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on local roads and other highway users. Vehicle tracking assessments were undertaken as part of the transport assessment process and informed the development of the access strategy and construction traffic routing arrangements. Routes have been selected on the basis that they are

ID	Theme	Comments/Issues Raised	Applicant's Response
			capable of accommodating the vehicle types proposed to use them. 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 CTMP [APP-201], which includes traffic management and mitigation measures intended to minimise impacts on local roads and other users of the highway network.
MB-PDA-010	PRoWs and Recreation	Loss of Community Access: The impact on people who use Frith Way, Lodge Road, and local footpaths and bridle paths daily for exercise and wellbeing has not been considered. Great Moulton has no rural park or designated community space, and these lanes and paths are our only refuge for peace, movement, and connection to nature.	The Applicant acknowledges the importance of Public Rights of Way to local communities and recognises that these routes are valued for recreation, access to the countryside and day-to-day wellbeing. 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 during construction, operation and decommissioning. Where temporary closures or diversions are required for safety reasons, these would be

ID	Theme	Comments/Issues Raised	Applicant's Response
			managed in accordance with the measures set out within the Outline PRowPPMP [APP-203]. The Applicant also notes that no permanent changes to Public Rights of Way are proposed as part of the Scheme and that, following the completion of construction works, access would be reinstated along the existing routes. The Applicant notes that access to the Public Rights of Way network would be maintained through the use of temporary diversions where required, as set out within the Outline PRowPPMP [APP-203].
MB-PDA-011	Human Health and Wellbeing	Mental Wellbeing and Psychological Impact: The cumulative disruption to landscape, noise levels, and access to nature will have a profound effect on residents' mental wellbeing. The loss of quiet walking routes, tranquil views, and familiar green spaces erodes the sense of place and emotional stability that rural communities rely on. For many, these spaces are not just recreational—they are essential for coping with stress, grief, isolation, and daily pressures. The industrialisation of this environment risks long-term psychological harm, especially	The Applicant acknowledges concerns regarding the potential effects of the Scheme on mental wellbeing, sense of place and access to the rural environment. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that landscape character, visual amenity and access to nature can influence wellbeing, and that large infrastructure projects can affect wellbeing through perceived environmental change, disruption, uncertainty and concern about potential risks. It also recognises that older people and those with existing health conditions may be more sensitive to such changes.

ID	Theme	Comments/Issues Raised	Applicant's Response
		for vulnerable individuals, families, and older residents.	In response to consultation feedback on mental wellbeing, a structured consideration of assessment of mental wellbeing and equality-related impacts has been undertaken through the Equality Impact Assessment [APP-214]. The Equality Impact Assessment considered issues including uncertainty, access to nature, visual amenity, place attachment, community severance and perceived safety, and concluded that, with mitigation in place, significant negative equality impacts are unlikely at a population level. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110114/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 participation and cumulative wellbeing effects. It is intended to supplement, rather than replace, the assessments submitted with the Application. It is intended to supplement, rather than replace, the assessments submitted with the Application. Its findings have been reported and will inform the consideration of any additional mitigation or monitoring commitments identified through the Examination.

ID	Theme	Comments/Issues Raised	Applicant's Response
			On the basis of the Human Health Summary Statement and Equality Impact Assessment currently available, the Applicant has not identified a likely significant population-level health effect. The Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27] further tests and documents that conclusion in light of the evidence submitted during the Examination.
MB-PDA-012	Socio-Economics	Local Business Impact: The development threatens the viability of nearby businesses including the football grounds, dog walking park, tourist accommodation, café/shop, airfield, and public house— jeopardising livelihoods and community services.	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 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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.
MB-PDA-013	Cultural Heritage Aviation	Environmental and Heritage Damage: The site lies at the source of the Starston Brook, with downstream impact on the Waveney River and Valley, and the historic Hundred Lane. The development will also result in the removal of mature trees, hedgerows, and vegetation across multiple parcels—damaging local biodiversity and permanently altering the rural landscape. Tibenham airfield has the potential to be severely impacted by “glint and glare” from the solar panels. This airfield is not just a valuable national resource for training pilots but it is historically extremely important having hosted the 445th bomber group during the war including actor James Stewart. It would be a travesty if this project impacted the airfield adversely as a business. It is also an extremely important resource for emergency landings.	The Applicant has assessed specific aviation activity associated with Norfolk Gliding Club in the context of glint and glare (presented in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025 to AS-029]), as well as emergency landings and other concerns raised by Norfolk Gliding Club (presented in the High Level Investigative Report [APP-222]). The Scheme is assessed as not having a significant impact.

ID	Theme	Comments/Issues Raised	Applicant's Response
MB-PDA-014	Soils and Agricultural Land	Loss of Arable Land: Productive farmland essential for food security is being sacrificed for industrial infrastructure.	The applicant refers to their response at KW-PDA-003.
MB-PDA-015	Noise and Vibration	Disruption and disturbance: The development will cause significant disruption when it is under construction due to the noise and impact on road networks. I am concerned about the potential impact on my land and house such as disruption to key services such as electric, water and internet and this risk of effects to the land causing issues such as subsidence to my house. The noise and vibration from construction and operational traffic will impact on us and will be significant as I frequently work from home. We believe that access to our property will be significantly restricted by limitations on road use as this development is constructed.	Assessment of noise and vibration effects are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The receptors most representative of Great Moulton are NSR1A and NSR1B, which lay to the south of Great Moulton. Construction noise effects are expected to be short-term negligible/minor adverse and not significant, with construction noise levels being below the measured ambient sound level at NSR1A and NSR1B. Operational effects during the daytime, night-time and early morning are expected to be long-term negligible and not significant, with rating levels being below the background sound levels at NSR1A and NSR1B.
MB-PDA-016	Human Health and Wellbeing	Mental health and well-being impact: Since learning of the proposal I have experienced significant anxiety about the ability to future plan. I am distressed about the potential industrialisation of our local	The Applicant acknowledges the concerns raised regarding anxiety, uncertainty and the perceived effects of the Scheme on residents' wellbeing, sense of place and enjoyment of the rural environment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		landscape and the impact on wildlife. I am concerned that such a large amount of infrastructure so close will impact on my family's health and well-being. The thought of losing the rural character and peace that drew us to this area, and which is integral to our well-being, has a serious emotional toll. The proposal threatens the sense of security and future we have worked hard to build in our home and community.	Potential effects on wellbeing associated with landscape and visual change, noise, traffic, access and recreation have been considered within the Human Health Summary Statement contained ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. 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 consultation feedback regarding mental wellbeing, an assessment of mental wellbeing and equality-related impacts was undertaken through the Equality Impact Assessment (EqIA) [APP-214]. The EqIA recognised concerns relating to uncertainty, access to nature, visual amenity and place attachment, but concluded that significant negative equality impacts were unlikely. The EqIA's population-level conclusion does not mean that no individual would experience anxiety, distress or a reduced sense of place. It reflects the assessment of the scale, distribution and likely duration of effects across the affected population. The Applicant has prepared a Mental Health and Wellbeing Addendum [EN0110114/EXAM/9.27] in response to matters raised during the Examination. The Addendum consolidates and

ID	Theme	Comments/Issues Raised	Applicant's Response
			provides further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. It supplements, rather than replaces, the assessments submitted with the Application. Its findings have been reported and will inform the consideration of any additional mitigation or monitoring commitments identified through the Examination.
MB-PDA-017	Cumulative and In-Combination Effects	The cumulative impact of these developments is wholly incompatible with the scale and character of our villages. The consultation process has been selective and insufficient, and at NO point have we felt genuinely listened to. Mitigation measures are inadequate, with minimal effort to conceal the infrastructure or protect the wildlife that currently inhabits this land.	See the Applicant's response to MB-PDA-002 to MB-PDA-016 above regarding impacts of the Scheme. 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. Each of the host and neighbouring authorities provided adequacy of consultation representations [AoC-001 to AoC-008], confirming that they considered

ID	Theme	Comments/Issues Raised	Applicant's Response
			the Applicant met the statutory consultation requirements. The consultation process is set out in the Consultation Report [APP-024] , which details the Applicant's approach to preapplication consultation.
MB-PDA-018	Statutory Nuisance	I am extremely concerned about the children in the village- the impact of having such a large amount of electrical voltage so near to them and the impact the noise will have on children with Autism who cannot filter out even low noises easily. I would urge you to look more carefully at this especially APP-053 Electromagnetic fields and APP-208 Statutory Nuisance documents again. The EIA does not seem sufficient to me. It does not suggest ways to mitigate the noise impact for Autistic children (and adults). This could cause significant harm to these individuals.	An assessment of Electromagnetic Fields (EMF) pertaining to human health is provided in ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053] and ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]. Electric fields are contained within the cable's protective insulation and sheath; therefore, no external electric fields are expected to occur due to the underground cables. The maximum levels of electromagnetic radiation during construction, operation and decommissioning phases will be below International Commission on the Non-Ionizing Radiation Protection reference levels. Given the mitigation measures embedded into the Scheme and secured through the Outline CEMP [APP-196] and Outline OEMP [APP-197], no significant adverse human health effects are expected as a result of EMF.

ID	Theme	Comments/Issues Raised	Applicant's Response
MB-PDA-019	Concluding Remarks	I urge decision-makers to suspend these proposals and initiate a full, transparent reassessment that includes meaningful engagement with all affected communities.	The Applicant notes the respondent's request. The application has been accepted for Examination by the Planning Inspectorate, confirming that the relevant statutory pre-application requirements have been met. The purpose of the Examination is to enable the Examining Authority to consider all submitted evidence and representations and determine whether the evidence is adequate, whether concerns remain, whether mitigation is sufficient and enforceable, and what additional controls or information may be required. The Applicant therefore considers that the statutory Examination process is the appropriate mechanism for testing the evidence before a recommendation is made to the Secretary of State.

Table 4.16 Melvyn John Porter [PDA-075]

ID	Theme	Comments/Issues Raised	Applicant's Response
MJP-PDA-001	Funding Statement	I suggest that the first item on the agenda for the examination of this proposal should be an assessment of the parent company behind the applicant. My understanding is that this is the same company that bought Thames Water in 2006, stripped the utility its profits and took out loans against its assets, so as to pay high dividends to its shareholders. I refer to an article in the Guardian which I have uploaded. I ask the Examining Board, is this the sort of company that the UK government should entrust to manage the project that is now being proposed? If the conclusion is no then significant time and taxpayers' money can be saved by rejecting the proposal immediately. Thank you.	The Applicant (Island Green Power) acknowledges the comment. Notwithstanding, it 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,

ID	Theme	Comments/Issues Raised	Applicant's Response
			East Pye Solar Limited, and how the Scheme is being funded.

Table 4.17 Neville and Pauline Earl [\[PDA-044\]](#)

ID	Theme	Comments/Issues Raised	Applicant's Response
NPE-PDA-001	Lands – Plans (change in plans)	We have received a Section 56 notice because the plans appear to affect our home and land. One of the things that has caused us a lot of confusion is that we have been sent different plans showing our property in different ways. The first plan we received appeared to show all of our property, including our house and garden. We were later sent another plan which appears to show red lines along the frontage of our property. We do not understand why the plans are different or what the red lines mean. The online documents are too big and not easy to understand so we cannot tell what they want. We also do not know if East Pye Solar has changed what it wants from us. exactly which parts of our home, garden, driveway, access or frontage are affected; If what they want has changed since the first plan was sent to us, we would like them to explain what has changed and why.	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). Members of the public are welcomed to use these channels to ask about the application documents, as well as how to access and read Scheme maps. The Applicant can confirm that the respondent's property, including the house and garden, is not required for the Scheme. The relevant interest arises from the respondent's ownership of land adjacent to the public highway, identified as Plot 09-021 on the Land Plan (APP 2.2). On the basis of the ad medium filum presumption, it is considered that the respondent may also own the adjoining section of highway up to the centre line of the carriageway. Accordingly, the respondent has been included in the Book of Reference [APP-022]. The Applicant has been in contact with the respondent to confirm the impact of the Scheme on their land interest on the 11 September 2025 and

ID	Theme	Comments/Issues Raised	Applicant's Response
			has written to them again on the 14 September 2026.
NPE-PDA-002	Lands Consultation	We are an elderly couple, and we are finding all the paperwork very difficult to understand. There are a lot of documents and legal words. We have tried to understand them, but we are still not clear about what East Pye Solar wants from us, what rights they want over our property, or why they need them We would like this explained clearly to us before we are expected to agree to anything. We are not trying to make things difficult. We simply want somebody to explain clearly what is planned for our property and what it could mean for us.	Please refer to the response provided at NPE-PDA-001.
NPE-PDA-003	Lands – Rights and Activities	what rights they want over our property; whether they or their contractors would be allowed to come onto our property; what they would be allowed to do there; why they need these rights.	Please refer to the response provided at NPE-PDA-001.
NPE-PDA-004	Lands – period of time	whether they want any of our land permanently;	Please refer to the response provided at NPE-PDA-001.

ID	Theme	Comments/Issues Raised	Applicant's Response
		whether they only want to use any part of our land for a period of time; how long any rights would last; and	
NPE-PDA-005	Lands	At the moment we do not feel able to agree to anything because we do not properly understand what is being asked of us. We would therefore like it recorded that we have not agreed to East Pye Solar taking any of our land or having rights over our property.	Please refer to the response provided at NPE-PDA-001.
NPE-PDA-006	Lands – Site Visit	We would also like to ask the Examining Authority to visit our home and property as part of a future site visit. We are happy to give permission for the Inspectors to come onto our property if this would help. We think seeing our home would make it much easier to understand our concerns and why the different plans we have been sent are confusing. The Inspectors would be able to see the position of our house, garden, frontage, driveway and access and how these relate to the proposed works.	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.

ID	Theme	Comments/Issues Raised	Applicant's Response
		We would particularly like the Inspectors to look at how we get in and out of our property. We would also like the Inspectors to see the proposed access points for the development and the roads that construction vehicles would use. We think it would help the Inspectors to visit our property so they can see where our house and garden are, the surrounding land, where water comes from and where it goes when there is heavy rain.	
NPE-PDA-007	Lands	We are worried about what could happen if there are traffic lights or other traffic controls, road works, construction traffic or large vehicles close to our entrance.	The Applicant notes the matters raised within this representation. Transport-related matters associated with access arrangements and highway impacts are addressed within the Applicant's response to NPE-PDA-008.
NPE-PDA-008	Lands	As an elderly couple, being able to get safely in and out of our home is very important to us. We would like the possible effect of the extra traffic and works on our access to be properly looked at.	The Applicant acknowledges the concerns raised regarding access to residential properties during the construction phase, particularly for residents who rely on the local highway network for day-to-day journeys and essential services. Construction traffic and any temporary traffic management measures would be managed in accordance with the Outline CTMP [APP-201], which includes measures intended to maintain safe

ID	Theme	Comments/Issues Raised	Applicant's Response
			access and minimise disruption to local residents throughout the construction period. The Applicant does not propose to prevent access to residential properties as a result of the Scheme. Access to properties would be maintained throughout construction, and any temporary traffic management measures would only be required for the duration of the construction phase. Once construction activities have been completed, local roads would revert to operating as they previously did.
NPE-PDA-009	Flooding	We are also very worried about flooding. Our property has already had problems with flooding in the past, so this is a real concern for us. We are worried that building work, changes to the fields, new tracks, access roads, drainage or other works could change where rainwater goes and could make the flooding at our property worse. We would also like East Pye Solar to explain what they have done to look at the risk of flooding at our property and how they will make sure their work does not make our flooding problems worse.	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. This concludes, no significant residual effects on the Water Environment are predicted during the construction or decommissioning phases of the Scheme; and only beneficial effects during Operation.

ID	Theme	Comments/Issues Raised	Applicant's Response
NPE-PDA-010	Lands	We are not experts and we do not know what will happen. We simply want to make sure this is properly looked at before any work is allowed to go ahead.	The Applicant notes this comment.
NPE-PDA-011	Lands	Until somebody has clearly explained what East Pye Solar wants from us and what the different plans mean, we would like to keep our position open. We would like the chance to make further comments when we have been given a clear explanation.	The Applicant notes this comment. Please refer to the response provided at NPE-PDA-001. It should also be noted that the examination process allows for the Respondent to provide further comments on the Scheme.
NPE-PDA-012	Lands	We would also like to keep our right to speak at a Compulsory Acquisition Hearing if we need to, once we understand what is being proposed.	The Applicant notes this comment.
NPE-PDA-013	Lands	Please put this letter on the Examination record and please do not take this letter as our agreement to East Pye Solar taking our land or having rights over our property.	The Applicant notes this comment and has provided a full response.

Table 4.18 Robert James Hazell [PDA-029]

ID	Theme	Comments/Issues Raised	Applicant's Response
RJH-PDA-001	Site Visit	Dear Planning Inspector, As part of the examination of the East Pye Solar Development proposals, I respectfully request that an accompanied site visit be undertaken to Adelaide Cottage in Saxlingham Nethergate, my home, a Grade II listed property, together with a walking viewing of the War Memorial, Church Hill as a whole, and up to Saxlingham Green. I believe such a visit is necessary to properly understand the likely impacts of the proposed development and associated highway works, many of which cannot be adequately appreciated from plans, drawings and written submissions alone.	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.
RJH-PDA-002	Transport and Access	In particular, the proposals include the widening and alteration of the highway immediately outside Adelaide Cottage [APP-007; APP-174], where the newly rebuilt timber-framed, wattle and daub gable end of the listed building directly abuts the road.	The Applicant acknowledges the concerns raised regarding the proximity of proposed highway works to Adelaide Cottage and the potential effects associated with Abnormal Indivisible Load (AIL) movements. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's Responses

ID	Theme	Comments/Issues Raised	Applicant's Response
		A physical inspection is essential to appreciate the proximity of the works to this historic structure and the potential effects on the building and its setting. These concerns are also set out in my Relevant Representation [RR-1633].	to the Examining Authority's First Written Questions. Document Reference: EXAM/9.2
RJH-PDA-003	Cultural Heritage	A site visit would also enable the Inspector to view other affected properties, heritage assets and structures within Saxlingham Nethergate and Saxlingham Green, including the War Memorial and the wider historic environment, and to assess the cumulative impacts of the proposals on the character and significance of the village.	Please note the Applicants response to RJH-PDA-001.
RJH-PDA-004	Utilities	In addition, the proposed highway works involve excavation and alteration of the road corridor above a National Gas Transmission (NGT) pipeline [EN0110014-000358]. Given the significance of this infrastructure and the concerns that have been raised regarding works taking place within its protection zone, I believe it would be beneficial for the Inspector to view this location on the ground as part of the examination.	Please note the Applicants response to RJH-PDA-001.

ID	Theme	Comments/Issues Raised	Applicant's Response
RJH-PDA-005	Site Visits	I would be pleased to accompany the Inspector and identify the locations and issues of particular concern.	The Applicant notes this response.
RJH-PDA-006	Concluding Remarks	<i>Applicant's Note:</i> The submission also includes a series of images showing Adelaide Cottage and its immediate relationship with the highway, views towards the War Memorial and surrounding village setting, and historic images of works to the cottage. These images have not been reproduced here and can be viewed in the original submission [PDA-065] .	The Applicant welcomes these images.

Table 4.19 Ross Joliffe [PDA-078]

ID	Theme	Comments/Issues Raised	Applicant's Response
RJ-PDA-001	Policy Compliance	NPS EN-1 4.2.12 states that applicants must ensure that applications are ready to be examined before an application is made. The Planning Act 2008 system is designed to be frontloaded and applications should not enter the statutory system if they are not ready to be consented. It also states that examination should not be used to address deficiencies in the application.	The Applicant notes that the Planning Inspectorate's acceptance of the application for Examination confirms that the Applicant fulfilled its statutory pre-application duties and that the application was accepted as suitable for examination under the Planning Act 2008 process. The Policy Compliance Document [APP-210] sets out how the Scheme complies with the relevant policy tests of NPS EN-1.
RJ-PDA-002	Policy Compliance	The East Pye evidence base contains internal inconsistencies and uncertainties that go beyond matters of interpretation. The examples in attachment 1 evidence a pattern across the evidence base; they are not an exhaustive list of defects. Compiling a sufficient Environmental Statement for assessment by the Examining Authority is the Applicant's obligation. I have made a parallel representation submitted for the South Norfolk Tree Warden Network that raises the same procedural point in relation to trees because of the scale of the problem across many documents. It is not confined to one topic/species e.g. Water Framework Directive/crayfish.	The Applicant notes this comment. The Applicant refers the respondent to the ES [APP-036 to APP-195], and the suite of other supporting Application documents which collectively set out the evidence base for the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
RJ-PDA-003	Policy Compliance	I am concerned that, without a structured mechanism to require resolution on a fixed timetable, the examination risks reaching Deadline 1, and ultimately the Examining Authority's recommendation, on a substantial but uncertain evidence base. We cannot ascertain the true extent of damage to the environment of the Tas Valley and water course or its mitigation from documents to date.	Please note the Applicants response to RJ-PDA-002.
RJ-PDA-004	Ecology and Biodiversity	The Examining Authority has already recognised the risk for white-clawed crayfish survey evidence (Rule 6 Letter, Annex F, item 9a), directing the Applicant to provide a methodology-explained update by procedural deadline A. I request that examination proceeds only on the basis that a complete ecological update is available and in line with regulation and NPS EN-1, rather than leaving arguments and resolution to an uncertain iteration within the examination process or later in the project.	The Applicant notes the Examining Authority's (ExA) request, in the Rule 6 Letter [PD-005]. The Applicant has provided an update on this at Procedural Deadline A within the Applicants Position on White Clawed Crayfish [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.
RJ-PDA-005	Ecology and Biodiversity	I am concerned that, if a full assessment has not been made during an iterative process, not envisaged in EN-1, then urgency and practical issues may lead to	A habitat suitability survey for White Clawed Crayfish was undertaken with the findings presented in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and Volume 3, Appendix 8.9 – Aquatic Habitat

ID	Theme	Comments/Issues Raised	Applicant's Response
		regrettable practice such as disturbance, introduction of disease or alien species, the release of temporary or persistent chemicals etc. and at any stage of construction, operation, maintenance, decommissioning or legacy: any of which could be harmful to river life.	Assessment Report [APP-160]. Measures to control pollution to watercourses are set out in the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198]. Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for main rivers and watercourses to prevent pollution.
RJ-PDA-006	Ecology and Biodiversity	The Applicant has sometimes stated such river life to be unlikely within the order limits or in part, for example in the case of water vole, otter and white clawed crayfish. Various local knowledge of white clawed crayfish and even Norfolk Rivers Trust survey presence confirmation that was conscientiously reported to East Pye Solar pre-application (BEPS RR refers) and then submitted in my own RR, has been overlooked (Rule 6 Letter, Annex F refers).	Please note the Applicant's response to RJ-PDA-006.
RJ-PDA-007	Ecology and Biodiversity	The East Pye evidence base concentrates upon protected species within the insufficient environmental statement, but obviously there are thousands of less protected species that are equally vulnerable to harm in the Tas Valley and its water courses.	Please note the Applicant's response to RJ-PDA-002.

ID	Theme	Comments/Issues Raised	Applicant's Response
RJ-PDA-008	Ecology and Biodiversity	Following my Relevant Representation (RR), I further object to the East Pye Solar proposal with the following additional evidence and points, mainly arising from incomplete evidence of impact assessment and assurance, and fears that evidence of the existence of river life has been either overlooked or systematically ignored together with a lack of application of regulations, namely the Water Framework Directive that is intended to protect the entire water course and not just that within the project limits. (my RR refers).	The Applicant has responded and clarified what watercourses have been assessed and the impact the proposed scheme will have on the catchments and all relevant watercourses. The Applicant has responded in detail to comments on the different watercourses and catchments that have been included and assess, as presented in their Relevant Representations. The Applicant refers to the following responses to BEPS in The Applicant's Response to Relevant Representations - Part 3 [PDA-010]: - Water environment – please refer to responses under comment IDs BEPS-019 to BEPS-086; BEPS-271 to BEPS-279 and GMAG-057 to GMAG-085.
RJ-PDA-009	Ecology and Biodiversity	Omissions and errors, if uncorrected, lead to the potential for a landscape-scale experiment within the ecological impact of massive industrial installation, operation and decommissioning works, particularly in consideration of the River Tas catchment. The primary purpose of Nationally Significant Infrastructure Project (NSIP) regulation is to provide a fast, clear, and centralized consenting process for major public works while protecting the environment from serious harm.	The Applicant notes this comment. The Applicant does not agree that potential effects on the River Tas catchment have been omitted or assessed in error. The River Tas and its hydrologically connected tributaries were expressly considered within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], with direct and indirect effects addressed through embedded avoidance measures, trenchless crossing techniques and secured pollution prevention, sediment control and biosecurity measures. The Applicant therefore remains satisfied that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			assessment is robust and that significant effects on the River Tas catchment are not anticipated.
RJ-PDA-010	Ecology and Biodiversity	It appears that a proper account of the natural environment baseline has not been carried out and that it is unrealistic to suggest that a catch-up could be achieved within the examination process without extending and confusing the process as conflicts emerge and revisions emerge:	The Applicant refers to its responses provided on potential effects to biodiversity within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID HePC-007, SPC-010, SPC-066, and BAPC -03.
RJ-PDA-011	DCO Process	I am a newcomer to this process, and I am impressed by the access to well-organised information on the Planning Inspectorate website but already feel concerned that the volume of material produced by East Pye Solar would be beyond the ability of most citizens, me among them, to read and digest properly: many of the documents contain detailed procedural information where specific Tas Valley survey/application is thin and scattered relative to its importance.	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

ID	Theme	Comments/Issues Raised	Applicant's Response
			Secretary of State), provided further information on obtaining DCO application documents.
RJ-PDA-012	DCO Process	This is to be expected, and so it is the job of statutory bodies, in this case Norfolk County Council, South Norfolk Council, the Environment Agency, Natural England and Anglian Water, to lead the response to proposals by thoroughly examining, assessing, and advising on the national infrastructure application so that the Secretary of State can make a final, legally sound consent decision. My reading to date suggests a procedural and limited approach, bound in official language and abbreviation and showing the potential for insufficient official resources, including those to read and digest more than two-thousand relevant representations from the public and organisations, most of which refer to protest and/or shortcomings. Adding new material ad-hoc to the documents as examination proceeds as suggested by the Applicant would impose a heavy and disruptive burden, even for the authorities.	The Applicant notes this comment.
RJ-PDA-013	Ecology and Biodiversity	a) the absence of protected species, for example white clawed crayfish, water vole and otters in various locations has been	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		implied by the Applicant through a view of habitat, and survey limitation, apparently done from the office. The shortcoming is typified within the Applicants own documentation in an opening procedural statement: '... the lack of data... does not prove that a specific species/species-group is absent from the search area... the area may simply be under-recorded.' (Environmental Statement Volume 3: Appendix 8.1, 2.7.1). Phrases such as 'based upon the assumption that the lack of water permanence was by itself enough to make the ditches unsuitable for water voles and otter' do not generate confidence in basic surveys - as if these animals were not opportunistic foragers in places where conditions are not permanently wet (and 'surveys were completed during a period of unusually dry conditions... the wetted extent, depth and in-channel habitat availability observed may under-represent typical conditions, particularly for ephemeral headwaters and field ditches.'). (Environmental Statement Volume 3: Appendix 8.9 Aquatic Habitat Assessment Report and Appendix 8.8 Water Vole and Otter Survey Report, 2.4.1 as quoted in Rule 6 Letter, annex F).	

ID	Theme	Comments/Issues Raised	Applicant's Response
RJ-PDA-014	Ecology and Biodiversity	Tas Valley-specific survey content is concentrated almost entirely in Environmental Statement Volume 3: Appendix 8.1, where crayfish are mentioned twice in about 25,000 words, first to state 'no records' for native white clawed crayfish and secondly referring to 'an older record of 2005' for non-native signal crayfish, that most readers would take to imply absence of native crayfish - and perhaps even the presence of non-native crayfish making native presence even more unlikely. (Again, this drives down confidence in survey method and effectiveness, specifically with respect to crayfish and overall).	The Applicant has provided an update in respect of white Clawed Crayfish at Procedural Deadline A within the Applicants Position on White Clawed Crayfish [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.
RJ-PDA-015	Ecology and Biodiversity	Curiously, in the Outline Landscape and Ecology Management Plan, a new artificial otter holt at Hempnall Beck implicitly assumes otter presence in somewhat similar habitat to Shotesham Beck, where absence is implied by the applicant, despite Shotesham Parish Council's evidence of presence. (Outline Landscape and Ecology Management Plan, 3.16.20 & Shotesham Parish Council RR 'Objection to East Pye Solar – Land Parcel 8...).	Otter surveys have been undertaken and detailed within <i>ES Volume 3 Appendix 8.8 Water Vole and Otter Survey Report</i>. No evidence of otter was recorded during the surveys, thereby concluding that the species is unlikely to be currently present within the Order Limits which present little habitat opportunity for holt creation. In order to enhance the Sites potential to provide opportunities for otters (potentially breeding opportunities) Sub-Site 7B has been chosen for an artificial holt location. This location is considered ideal as it would be protected from

ID	Theme	Comments/Issues Raised	Applicant's Response
			damage/persecution within the operational site fenceline, yet in very close proximity to a variety of wetland habitats (watercourses, ditches, ponds, lowland fen, wet woodland) associated with the Hempnall Beck, which are suitable for otter foraging purposes and hydrologically connected to the wider River Tas catchment (which holds otter records), thus providing the most opportunity for uptake of the feature.
RJ-PDA-016	Water Environment	Project 'hardware' contact with the watercourse and risks appear uncertain from a reading of several documents.	Impacts to water courses are addressed in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], ES Volume 1, Chapter 9 – Water Environment [APP-045] and ES Volume 1, Chapter 16 – Ground Conditions [APP-052]. Measures to control pollution to watercourses are set out in the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198].
RJ-PDA-017	Water Environment	b) I have tried to form an understanding of what fluids such as bentonite are used in 'horizontal direct drilling' intended to avoid trenches through watercourses when burying cables etc. The Environment Agency has referred to this process and products called 'bore-gel' and 'EZ mud in their RR together with the potential for	The exact drilling fluid products to be used will also be confirmed in the detailed CEMP, and Safety Data Sheets (SDSs) will be provided to the Environment Agency for approval prior to commencement of drilling works. Where feasible, the Applicant will seek to avoid the use of PFAS-containing bentonite, polymers, fuels, oils or other chemicals, and any proposed substitute products ('or similar') will be subject to review by

ID	Theme	Comments/Issues Raised	Applicant's Response
		persistent toxic chemicals. It seems clear that the fluids remain in the ground, but it remains unclear exactly what the chemicals are, whether they are toxic and/or persistent over time and what happens when accidentally spilled into rivers or introduced by flood damage, spring water etc. The drilling itself will surely open new drainage pathways making it likely that synthetic fluids will enter the water course. The drilling process appears potentially to introduce a permanent and less-understood hazard than the obvious hazards of cutting into riverbeds, and may not be one designed primarily to prevent water contamination.	the Environment Agency through prior submission of SDSs. These commitments ensure that drilling fluids will be appropriately selected, controlled, and monitored, and that groundwater and ecological receptors will be protected throughout the construction phase.
RJ-PDA-018	Water Environment	c) The consequences upon the watercourse of firefighting through unknown chemicals and dust from various burning infrastructure including batteries can be assumed to be toxic, likely permanently hazardous and with no certainty of containment (and indeed containment does not seem possible).	The Applicant has responded in relation to the management of surface water runoff in the event of a battery fire incident at the BESS which can be found within Outline BSMP [APP-200].
RJ-PDA-019		A similar set of problems remain on commissioning, operation, maintenance and decommissioning pesticide, chemical and dust contaminations. Management	As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] (with detailed design secured through DCO

ID	Theme	Comments/Issues Raised	Applicant's Response
		appears to rely upon monitoring rather than certainty of containment: so a contamination may eventually be detected, but then what? This appears more experimental than preventative.	Requirement 11), the BESS and Substations will have surface water drainage systems which will be lined with an impermeable membrane to prevent runoff from these areas from percolating through to the strata beneath. The solar panels within fields and standalone inverter/converter units have a low pollution risk. The solar panels will be PFAS free and will be cleaned with distilled water as set out in and secured by the Design Principles, Parameters and Commitments [APP-213]. As such, the infrastructure proposed for the Scheme poses no significant pollution risk to the sensitive water receptors in the area. Mitigation measures for the operational and decommissioning phases are set out in the Outline OEMP [APP-197] and Outline DEMP [APP-198].
RJ-PDA-020	Decommissioning	d) Parts of the project will never be removed after its useful life has ended with unknown consequences for currently unknown reasons and long into the future.	The Applicant notes the concerns raised regarding parts of the Scheme remaining in situ after decommissioning. The Applicant is seeking a time-limited consent for the Scheme, which apart from the National Grid Substation and associated Grid Connection Infrastructure, would be in operation for up to 60 years, after which time the Scheme will be decommissioned. The National Grid Substation is anticipated to be permanent and remain in-situ and in operation beyond 60 years as these assets

ID	Theme	Comments/Issues Raised	Applicant's Response
			will form part of the National Electricity Transmission System (NETS) which is owned and operated by National Grid. The assessments presented within the ES have been undertaken on this basis, as described in ES Volume 1, Chapter 4 - The Scheme [APP-040] The decommissioning of the Scheme is secured through Requirement 21 of the Draft DCO [AS-032], with failure to comply with a DCO Requirement being a criminal offence.
RJ-PDA-021	Ecology and Biodiversity	e) I have not been able to find a dedicated and comprehensive crayfish protection method statement anywhere across the Outline Protected Species Mitigation Strategy, the Outline Construction Environmental Management Plan, the Outline Decommissioning Environmental Management Plan, the Outline Operational Environmental Management Plan, the Outline Landscape and Ecology Management Plan, or the Outline Cable Route Construction Statement.	The Applicant has provided an update in respect of white Clawed Crayfish 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.
RJ-PDA-022	Ecology and Biodiversity	f) Nearly 600 people/organisations mentioned concern for animal species and/or their habitats in relevant representations. Over a hundred people mentioned crayfish, and many other people	The Applicant notes this comment. In relation to white-clawed crayfish, the Applicant acknowledges the level of public concern regarding protected species and habitats. However, the

ID	Theme	Comments/Issues Raised	Applicant's Response
		have pointed-out easily obtainable evidence, including some photographs, showing protected species' presence, including where absence is implied by the Applicant. This level of concern and knowledge surely undermines public confidence in the adequacy of professionally produced documents upon which Examining Authority is expected to make judgements.	number of representations raising an issue does not, in itself, demonstrate that the Environmental Statement is inadequate. The assessment was informed by desk-study records, field surveys, habitat suitability, hydrological connectivity and professional judgement, and does not treat the non-detection of a species during survey as confirmation of absence. Any additional records or photographs should be considered on their individual evidential merits, including whether the species identification, location, date and relevance to an affected receptor or impact pathway can be verified. The Applicant acknowledges the historic presence of white-clawed crayfish within the wider River Tas catchment. However, no records or field evidence of the species were identified within the Order Limits, and habitat suitability within the surveyed reaches was assessed as low. Notwithstanding this, potential effects were assessed within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], and precautionary avoidance, biosecurity, pollution prevention and sediment control measures have been incorporated for sensitive aquatic receptors. Should the species be present within watercourses affected by the Scheme, these measures would avoid or minimise potential effects. The Applicant provided its

ID	Theme	Comments/Issues Raised	Applicant's Response
			detailed response and supporting justification at Procedural Deadline A in the Applicant's Position Statement on White-Clawed Crayfish [PDA-007] .
RJ-PDA-023	Ecology and Biodiversity	g) Finally, Biodiversity Net Gain is offered together with small land areas dedicated to nature as if the project will create a significant natural benefit. Biodiversity Net Gain is often paired with small, fragmented plots of land, overstating their potential to deliver meaningful environmental benefits. The complex dynamics of the natural world will inevitably conflict with the assumptions of people. For instance, instead of the intended high-value habitat, such areas could degrade with die-off of the desired species, especially planted flora.	The Applicant refers to its responses on BNG, the Green Infrastructure Strategy ([AS-005]) , and LNRs provided within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID MFPC-005, SNPC-027, SePC-008 and SPC-067.
RJ-PDA-024	Ecology and Biodiversity	Even with mitigation strategies, complete ecological certainty is unachievable, especially when the long-term management actions and their ultimate impacts were not fully undocumented/managed. (A proper analysis of benefit or damage in later years would be highly desirable to assess assertions, but only if a reliable baseline were available now).	The Applicant refers to its responses on BNG, the Green Infrastructure Strategy, and LNRs provided within The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011] under comment ID MFPC-005, SNPC-027, SePC-008 and SPC-067.

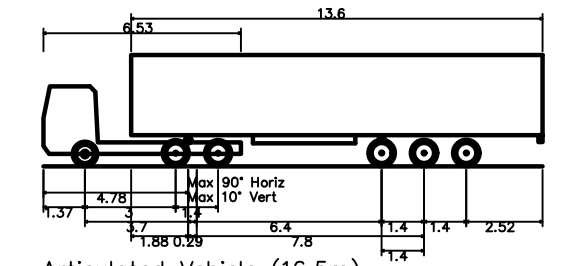
Appendix A Vehicle Tracking Drawings



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- VEHICLE PROFILE:



Articulated Vehicle (16.5m)	16.500m
Overall Length	2.550m
Overall Width	3.681m
Overall Body Height	0.411m
Min Body Ground Clearance	2.500m
Max Track Width	6.00s
Lock to lock time	6.530m
Kerb to Kerb Turning Radius	

P01 FIRST ISSUE	JO	TH	2026.10.05
Issued/Revision	By	Appd	YYYY.MM.DD
	JO	JO	2026.02.04
	Dwn.	Dsgn.	Chkd. YYYY.MM.DD

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DEVELOPMENT CONSENT ORDER

Title

VEHICLE TRACKING
SHOTESHAM ROAD - WOOTON ROAD -
SPRINGWOOD LANE
16.5M HGV

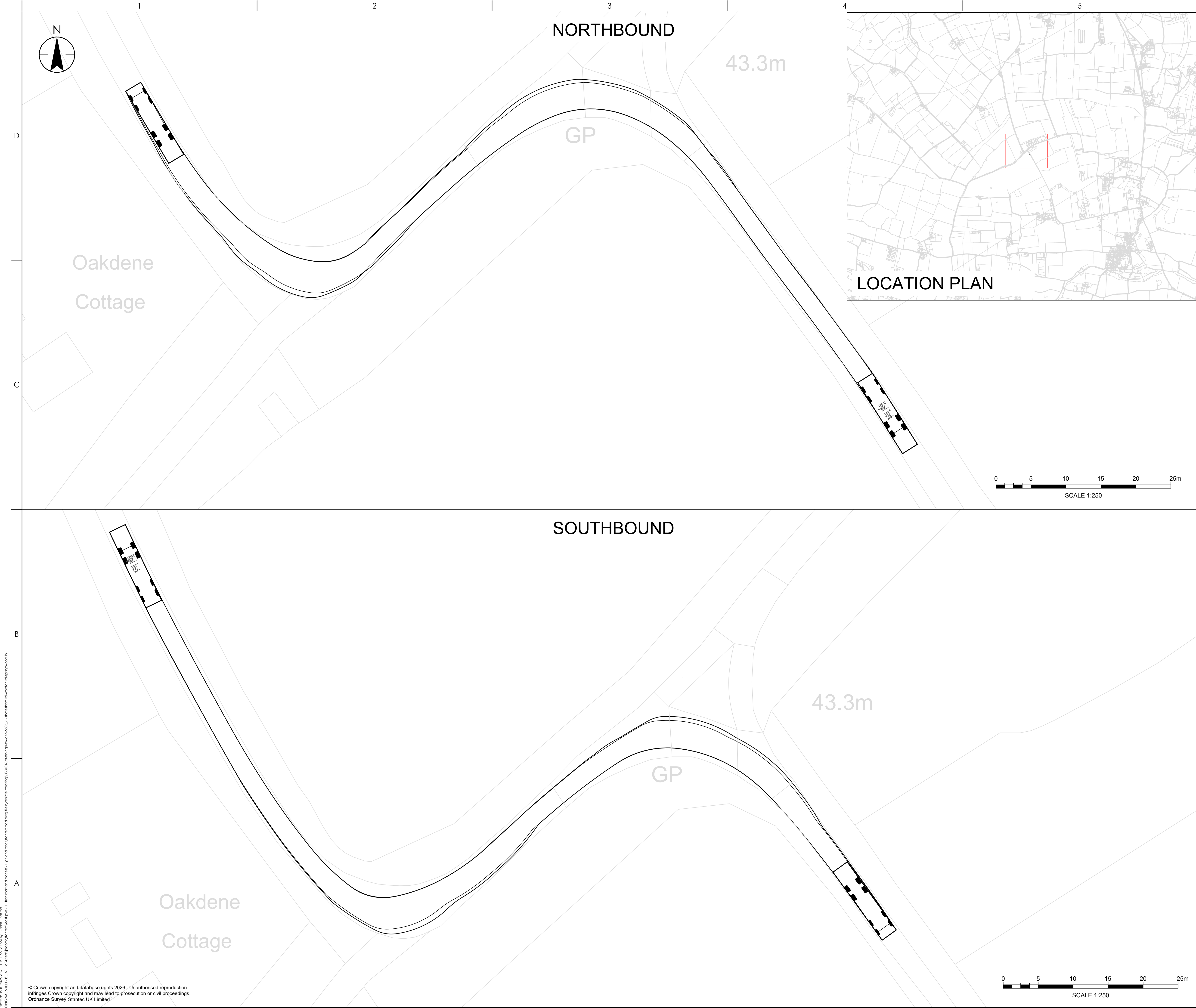
SHEET 1 OF 1

Project No.	AI Scale
333101678	1:250

Revision	Drawing No.
-	333101678-STN-HGN-SW-DR-H-5505-P01

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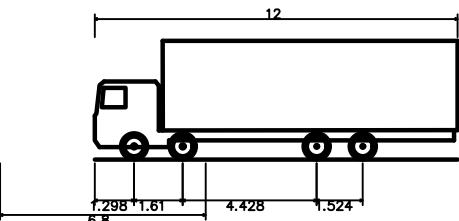


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- Notes
- UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake their own investigation where the presence of any existing sewers, services, plant or apparatus may affect their operations.
- VEHICLE MOVEMENTS HAVE BEEN MODELLED AT A FORWARD DESIGN SPEED OF 5 KM/H.
 - ALL VEHICLE PATHS ASSUME IDEALISED SWEEPED PATHS WITH NO ALLOWANCE FOR DRIVER ERROR OR OVERHANG CLEARANCE.
 - THIS DRAWING IS FOR CONCEPT DESIGN PURPOSES ONLY AND IS SUBJECT TO CHANGE.
 - SUBJECT TO DETAILED DESIGN, INCLUDING TOPOGRAPHICAL SURVEY, KERB HEIGHTS, SURFACE GRADIENTS, AND VISIBILITY SPLAYS.
 - ALL MOVEMENTS SHOWN ARE FORWARD GEAR ONLY UNLESS EXPLICITLY LABELLED OTHERWISE.
 - BASE MAPPING DERIVED FROM ORDNANCE SURVEY DATA AND MAY NOT REFLECT CURRENT SITE CONDITIONS.

VEHICLE PROFILE:



Rigid Truck	12.000m
Overall Length	12.000m
Overall Width	2.500m
Overall Body Height	2.500m
Min Body Ground Clearance	0.42m
Track Width	2.47m
Lock to lock time	2.00s
Kerb to Kerb turning Radius	11.900m

PD1 FIRST ISSUE	JO	TH	2026.10.05
Issued/Revision	By	Appd	YYYY.MM.DD
	JO	JO	TH
	Dwn.	Dsgn.	Chkd.

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Client/Project Logo



Client/Project
ISLAND GREEN POWER

EAST PYE

DEVELOPMENT CONSENT ORDER

Title
VEHICLE TRACKING
SHOTESHAM ROAD - WOOTON ROAD -
SPRINGWOOD LANE
12M HGV

SHEET 1 OF 1

Project No. 333101678 A1 Scale 1:250

Revision - Drawing No. 333101678-STN-HGN-SW-DR-H-5506-P01

Project: 333101678-2026.10.05 11:29:20 AM by: Odem - Jemima
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D

C

B

A

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NORTHBOUND

GP

43.3m

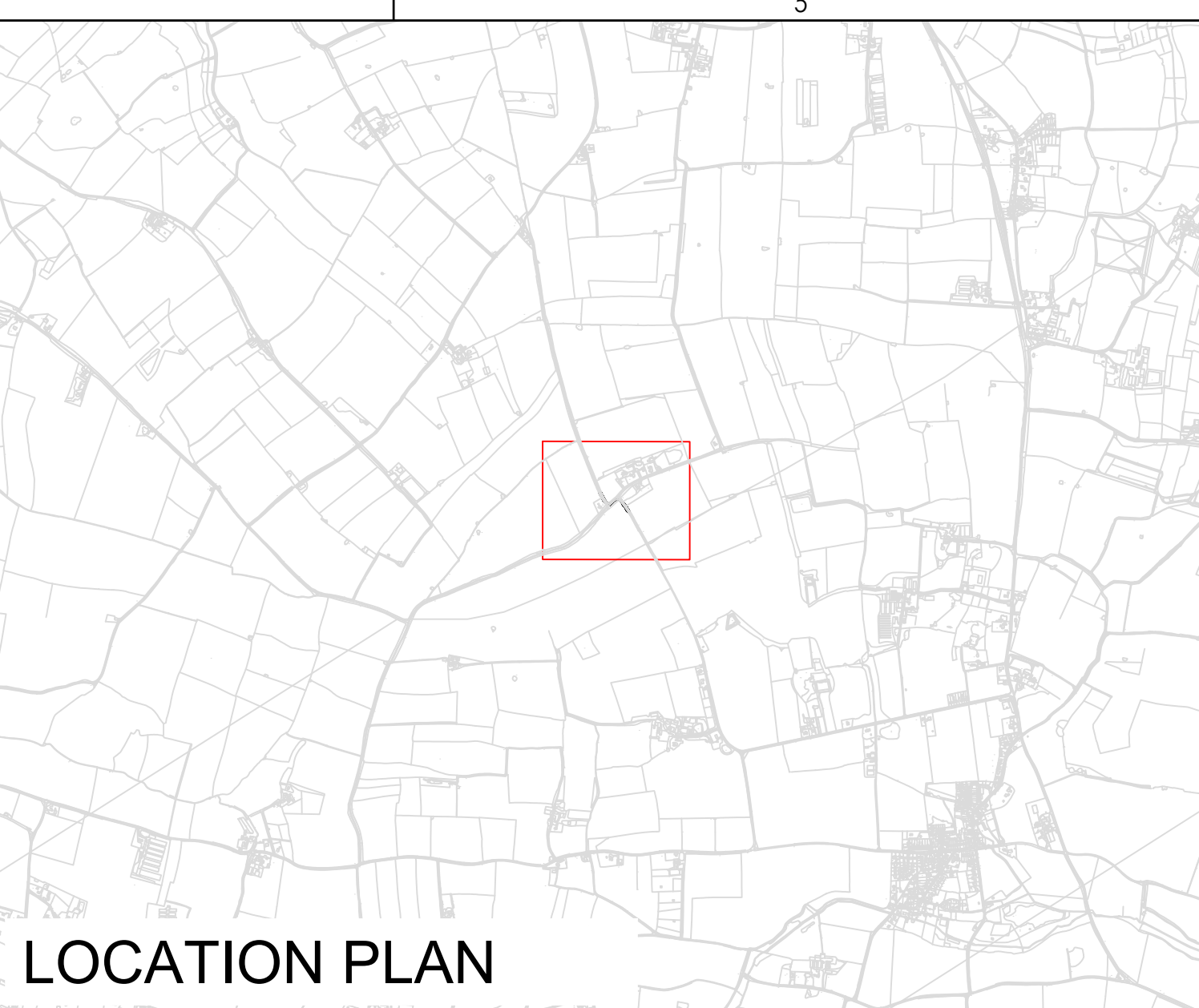
SOUTHBOUND

GP

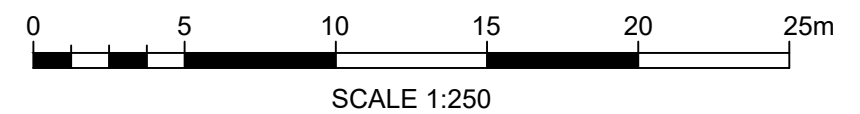
43.3m

0 5 10 15 20 25m

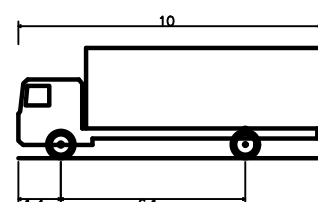
SCALE 1:250



LOCATION PLAN



SCALE 1:25



FTA Design HG Rigid Vehicle (1998)	
Overall Length	10.000m
Overall Width	2.500m
Overall Body Height	3.645m
Min Body Ground Clearance	0.440m
Track Width	2.470m
Lock to lock time	3.00s
Kerb to Kerb Turning Radius	11.000m

P01 FIRST ISSUE		JO	TH	2026.10.05.DD
Issued/Revision		By	Appd	YYYY.MM.DD
	Vehicle Tracking of -	-		2026.02.04
	Dwn.	Dsgn.	Chkd.	YYYY.MM.DD

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ISLAND GREEN POWER

EAST PYE

DEVELOPMENT CONSENT ORDER

Title

VEHICLE TRACKING
SHOTESHAM ROAD - WOOTON ROAD -
SPRINGWOOD LANE
10M HGV

SHEET 1 OF

SHEET 1 OF 1

Project No. 333101678	AI Scale Custom
Revision -	Drawing No. 333101678-STN-HGN-SW-DR-H-5507-P01