



East Pye Solar
The Applicant's Response to the Examining
Authority's First Written Questions

Revision 1

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 This document provides East Pye Solar Limited's (the 'Applicant') response to the Examining Authority's (ExA) first written questions, issued on 23 September 2026 [PD-006].

1.2 Structure of this Report

- 1.2.1 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:
- General and cross-topic questions
 - Design, parameters and other details of the proposed development
 - Site selection and alternatives
 - Aviation
 - Climate change
 - Community, health and well being
 - Compulsory acquisition and temporary possession
 - Cultural heritage
 - The Draft Development Consent Order
 - Ecology and biodiversity
 - Landscape and visual
 - Noise and vibration
 - Soils and agricultural land
 - Traffic and transport
 - Water environment
 - Other matters
- 1.2.2 References to the Application document are provided in accordance with the referencing system set out in the Planning Inspectorate's East Pye Solar [Examination Library](#).

- 1.2.3 Revision suffixes have also been attached to any documents which have been revised and resubmitted to the Planning Inspectorate during the Examination

Table 1.1 List of Acronyms of Submission Documents

Reference	Submission Document
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
EqIA	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 Resource and 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

2 Written Questions

2.1 General and cross-topic questions

ExQ	Respondent	Question	Applicant's Response
Q1.1.1	The applicant	Mitigation hierarchy The Overarching National Policy Statement for Energy (EN-1) states that applicants must apply the mitigation hierarchy and demonstrate that it has been applied (4.2.23). It goes on to say that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated (paragraph 4.2.24) and how residual impacts will be compensated as far as possible. This is one of the requirements to be satisfied for the Critical National Priority presumption to apply (paragraph 4.2.27). For each relevant topic area, the applicant is requested to provide a summary demonstrating how the mitigation hierarchy has been applied, including cross-references to relevant documents. This should also show how each relevant mitigation measure is secured through the draft Development Consent Order (dDCO) [AS-032].	The Applicant has developed a set of project level design principles, including IGP Design Principle 8 '<i>Our Commitment to Mitigation</i>' which states that '<i>Mitigation is addressed through the above project level design principles, through the mitigation hierarchy and embedded mitigation will be applied throughout the design process</i>'. The Applicant's commitment to mitigation is set out above through the various management plans, design principles and parameters commitments, and through the Requirements it has included within the Draft DCO [AS-032]. As described within the Design Approach Document [APP-212], as the design progressed and, in accordance with the mitigation hierarchy, the design focused primarily on avoiding environmental constraints as far as practicable. This included developing buffers (offsets) from existing landscape and ecological features, such as the identification of trees of veteran status (design principles 2.2, 3.5 (see Table 3.1 of the Design Approach Document [APP-212]). Where appropriate land of suitable size with known environmental constraints or layered/multiple constraints (for example, BMV

ExQ	Respondent	Question	Applicant's Response
			quality agricultural land and potential archaeological assets) were identified, these were considered for potential mitigation areas (design principles 2.3, 2.6, 2.7, 2.8) and potential for land to be retained in agricultural use. For example, retention as agricultural land offered the opportunity for these areas to provide skylark mitigation and/or enhancement to arable field margins (design principles 2.2, 3.4, 7.3). Further detail and examples of design changes can be found in the Design Approach Document [APP-212]. ES Volume 1, Chapter 2 - EIA Methodology [APP-038] sets out the mitigation hierarchy approach adopted in the ES. The mitigation hierarchy is as set out below: Avoid or prevent: in the first instance, mitigation will seek to avoid or prevent the adverse effect at source, for example, by routeing the Cable Route Corridor or siting the Solar PV Panels away from sensitive receptors; Reduce: if the effect is unavoidable, mitigation measures will be implemented which seek to reduce the significance of the effect, for example, the use of a noise barriers to reduce construction noise at nearby noise sensitive receptors; and

ExQ	Respondent	Question	Applicant's Response
			Offset: if the effect can neither be avoided nor reduced, mitigation will seek to offset the effect through the implementation of compensatory mitigation, for example, habitat creation to replace any habitat losses. The application of the mitigation hierarchy for relevant environmental topics is summarised below. <u>Climate Change</u> The Applicant has considered the mitigation hierarchy in the event of adverse effects resulting from the Scheme on climate change (ES: Chapter 6 Climate Change [APP-042]) by avoiding, reducing or mitigating comprehensively across all lifecycle phases (construction, operation and maintenance, and decommissioning) to address greenhouse gas emissions and climate change resilience. Table 6.36, Table 6.37 and Table 6.38 provide a summary of mitigation measures proposed through embedded infrastructure design and the application of general health and safety practices where avoidance and reduction cannot be solely relied upon. Examples of avoidance and reduction measures include prioritising the use of low-carbon design materials, adopting the Considerate Constructors Scheme, regular planned maintenance of plant and machinery, retention of existing vegetation as shown on the

ExQ	Respondent	Question	Applicant's Response
			Green Infrastructure Strategy [AS-005], and implementation of a Travel Plan as stated in the Outline CTMP [APP-201] to reduce worker trips. Mitigation measures include incorporation of HVAC systems within equipment containers for the BESS units to reduce emission impacts as a consequence of high temperatures and water management measures to control surface water run-off and drain hardstanding and other structures as secured through the Outline OEMP [APP-197]. Following implementation of mitigation measures, no significant adverse effects are anticipated. The GHG assessment findings indicate the Scheme will yield significant beneficial impacts on total GHG emissions. No requirements for compensation have been identified in relation to climate change. <u>Landscape and Visual</u> The mitigation hierarchy for landscape and visual effects has been applied throughout the design of the Scheme, with landscape and visual effects minimised as far as practicable. The Green Infrastructure Strategy [AS-005] has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Regarding avoidance and reduction, direct effects on nationally designated landscapes have been avoided through the siting

ExQ	Respondent	Question	Applicant's Response
			of the Scheme away from the Broads National Park and its setting. Development within environmentally sensitive locations has been minimised through the application of offsets and buffers to Public Rights of Way (PRoW), ancient woodland, hedgerows and watercourses, as set out in the Design Principles, Parameters and Commitments [APP-213]. The cable route corridor (CRC) will be undergrounded, avoiding permanent operational landscape and visual effects associated with above-ground infrastructure. Existing trees and hedgerows have been retained wherever practicable and were a key consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances for retained trees and hedgerows. Bespoke stand-off distances have been incorporated around residential receptors to reduce visual effect on residential receptors, as illustrated on the Indicative Masterplan [APP-059]. Mitigation identified includes a Green Infrastructure Strategy [AS-005] which has been developed to strengthen and reinforce existing hedgerows through infill planting, laying and coppicing, alongside the provision of new tree and woodland planting. These measures will assist in integrating the Scheme within the landscape and

ExQ	Respondent	Question	Applicant's Response
			provide visual screening. The implementation, management and monitoring of landscape mitigation during construction and operation are secured through the Outline LEMP [APP-199], secured by a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured through the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively, via the Draft DCO [AS-032]. With regards to compensation and enhancement, Sub-Site 7F has been identified as an opportunity to provide new accessible green space, which may include informal recreation and dog walking. Areas within the site have been identified for landscape mitigation and enhancement, including scrub planting, broadleaved woodland creation and the restoration of ghost ponds. Further details are provided within the Outline LEMP [APP-199]. Three new permissive paths at Sub-Sites 7F, 8B and 10B to maintain and enhance public access. These routes will complement the existing PRow network and provide alternative connections for pedestrians. The Outline Public Rights of Way and Permissive Paths Management Plan [APP-203] sets out the principles, management measures and commitments for the protection and management of PRowS and permissive paths. Application of the mitigation hierarchy as

ExQ	Respondent	Question	Applicant's Response
			described above has sought to minimise impacts as far as practicable, however significant adverse residual effects have been identified. Landscape and visual effects are experiential in nature and relate to changes in landscape character and visual amenity, landscape and visual effect cannot generally be offset or compensated for through the provision of equivalent measures elsewhere. Therefore, compensation is not typically regarded as an appropriate mechanism for addressing residual landscape and visual effects. <u>Ecology and Biodiversity</u> The Scheme's design evolution has sought to avoid important ecological features, such as field boundary hedgerow and ditch networks, watercourses, and woodlands. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances for retained woodlands, ancient woodlands, trees, hedgerows, ponds, watercourses, and statutory non-statutory sites for nature conservation. Temporary CRC works have avoided features such as watercourses, lowland fen, and county wildlife sites through Horizontal Directional Drilling (HDD).

ExQ	Respondent	Question	Applicant's Response
			Further mitigation measures relating to construction and decommissioning are secured through the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively, via the Draft DCO [AS-032].Habitat enhancement/creation measures to be undertaken during construction have been proposed within the Outline LEMP [EN0110014/APP/7.4] in line with the Biodiversity Guidance for Solar Developments¹ guidance published by the BRE. These measures will safeguard key habitats for the benefit of wildlife and enhance the ecological value of land currently under agricultural use. Further information regarding species-specific safeguards is provided within the Outline PSMS [EN0110014/ APP/6.3.8.10]. The Outline PSMS includes reference to species-specific avoidance/mitigation/compensation measures, including the provision of skylark compensation measures within retained arable parcels in the Order Limits. No significant adverse residual effects have been identified in relation to ecology and biodiversity. <u>Water Environment</u>

¹ BRE (2014) *Biodiversity Guidance for Solar Developments*. Eds G E Parker and L Greene

ExQ	Respondent	Question	Applicant's Response
			With regards to avoidance and reduction, ES Volume 3, Appendix 9.1 Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] takes account of Environment Agency fluvial modelling for the area and surface water flood extents. All built infrastructure, construction compounds and stockpiles will be located outside of all modelled floodplains up to and including the fluvial 1 in 1,000 (0.1%) annual probability plus allowance for climate change floodplain, and as far as reasonably practicable, outside of low to high surface water flood risk areas. This is secured within the Design Principles, Parameters and Commitments [APP-213]. There is a commitment to Avoidance Areas of watercourses whereby trenchless technologies are used rather than open cut trenches for cable installation, as secured within the Outline CEMP [APP-196]. The Scheme has also been designed to incorporate a minimum 10metre buffer from the top of bank of watercourses as secured within the Design Principles, Parameters and Commitments [APP-213]. Embedded mitigation has been identified with ES Volume 1, Chapter 9 – Water Environment [APP-045] and ES Volume 3, Appendix 9.1 Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], including

ExQ	Respondent	Question	Applicant's Response
			commitments to raising solar panels above modelled flood levels and implementation of appropriate surface water management measures for impermeable surfaces. The embedded mitigation is secured within the Design Principles, Parameters and Commitments [APP-213] and/or the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Following implementation of mitigation measures, no significant adverse effects are anticipated. No requirements for compensation have been identified in relation to the Water Environment. <u>Cultural Heritage</u> ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Design Approach Document [APP-212] identify the stages at which initial assessment of heritage assets allowed for embedded mitigation measures to be incorporated into the design of the Scheme to avoid and reduce effects so that there are no direct impacts on designated or non-designated assets. Scheme-wide setbacks (e.g. Sub-Site 5B and Sub-Sites 7A-D) and removal of portions (e.g. Site 9) or whole Sites have been incorporated in the design of the Scheme (e.g. Site 6). Transportation routes have been selected to avoid additional traffic movements in the area of

ExQ	Respondent	Question	Applicant's Response
			sensitive heritage assets where possible. The locations of high impact constructions activities are located to avoid areas of known archaeological remains and be unobtrusive to the settings of heritage assets (e.g. compounds, sub-stations). Mitigation for noise effects on sensitive heritage assets includes using acoustic fences around the BESS during operation of the Scheme. Visual screening Scheme-wide to include e.g. linear native tree belts, enhanced hedgerows and tree planting in gaps in hedgerows (e.g. Sites 7-10). Where avoidance or reduction cannot be applied, then additional mitigation measures are to be implemented in line with ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], which is mainly concerned with below-ground archaeological remains during the construction phase. This will be secured in line with the Draft DCO [AS-032]. Sensitive above-ground heritage assets, including listed buildings, conservation areas and historic hedgerows, which could not be avoided in the design evolution process, appropriate management plans will be in place, 7.1 Outline CEMP [APP-196], the Outline LEMP [APP-199], and the Outline CTMP [APP-201]. Following

ExQ	Respondent	Question	Applicant's Response
			implementation of mitigation measures, no significant adverse effects are anticipated. Following informative trenching, some of the archaeological excavation areas may take the form of 'compensation' excavation rather than mitigation of individual impacts. The compensation, therefore, is fully investigating specific or identified heritage assets in lieu of the cumulative 'acceptable loss' of minor elements of less significant heritage assets (i.e. acceptable loss being that portion of the heritage asset lost to piling where the remainder of the asset may be preserved in situ), but only where this has the potential to contribute to regional and national research objectives. <u>Transport and Access</u> The Applicant has applied the mitigation hierarchy for traffic and transport through the assessment presented in ES Volume 1, Chapter 11 – Transport and Access [APP-047] and supported by ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174-177], the Outline CTMP [APP-201], the Outline PRowPPMP [APP-203] and the Outline OTMP [APP-202]. Together they set out the assessment methodology and the management and mitigation measures for the Scheme.

ExQ	Respondent	Question	Applicant's Response
			To avoid impacts, through Scheme design and layout of the solar arrays no permanent closures of PRow are proposed with routes retained and enhanced where possible. The Scheme has also sought to use existing field accesses wherever practicable rather than create new accesses to Sub-Sites. Where substations are required the Applicant has chosen locations that can be safely reached by the abnormal load vehicles required to transport the associated transformers. The Applicant has also committed to the use of trenchless crossing techniques, such as horizontal directional drilling, to avoid impacts on the A140, B1527, B1332. To reduce the impact on the Local Road Network there are three proposed internal haul routes to connect the Sites that will be temporary for construction. These are as described in Outline CTMP [APP-201] and will be utilised to connect Sub-Sites 7A-F including using CRC11 and CRC12, Sub-Sites 7G-L and Sub-Sites 8A-B. The Applicant also sought to avoid or minimise movements through villages such as Great Moulton, Long Stratton, Hempnall, Saxlingham Nethergate and Brooke as well as avoiding sensitive heritage assets as far as practicable. The routeing has also been designed such that

ExQ	Respondent	Question	Applicant's Response
			construction HGVs do not travel through the Norwich Air Quality Management Area (AQMA). As set out in Chapter 7 of the Outline CTMP [APP-201] management and mitigation measures include: Defined construction routes, delivery scheduling, controls on construction working days and times, use of construction compounds for materials consolidation and as HGV holding areas where vehicles wait to be called forward to site to manage and control the flow of vehicle, reducing the size of construction HGVs used to access specific Sub-Sites to help with manoeuvring on rural roads, Temporary Traffic Management measures including temporary speed restrictions, traffic light controls, lane closures or full road closures, turning movement restrictions i.e. left turn in/out of some accesses, use of passing places to reduce vehicle conflict - either new places or enhancing existing, signage to assist enforcement of preferred routes, wheel cleaning facilities, Traffic marshals, community engagement, road condition surveys, and Construction Worker Travel Plan. Regarding enhancement, three new permissive paths are proposed to enhance the existing PRoW network as set out in the Outline PRoWPPMP [APP-203]. No significant adverse residual effects have been identified for transport and access.

ExQ	Respondent	Question	Applicant's Response
			<u>Noise and Vibration</u> Regarding avoidance and reduction, the BESS Containers / Compound will be a minimum of 200m from residential properties as set out in the Design Principles, Parameters and Commitments [APP-213] which is secured by Requirement 5 of the Draft DCO [AS-032]. Commitments to mitigate operational noise are secured within the Outline OEMP [APP-197]. This includes physical mitigation such as acoustic attenuators, silencers or enclosures and a 4m high acoustic fence included around the BESS enclosure. Mitigation measures to reduce the impacts of noise and vibration during construction and decommissioning, are set out in the Outline CEMP [APP-196] and Outline DEMP Plan [APP-198]. Following implementation of mitigation measures, no significant adverse effects are anticipated. <u>Air Quality</u> In order to avoid and reduce air quality effects, the Scheme design does not include flexibility for a centralised combustion-based energy centre as part of the solar generation asset. The Order Limits are located more than 9km from the nearest Air Quality Management Area (AQMA) in Central

ExQ	Respondent	Question	Applicant's Response
			Norwich. Furthermore, the Outline CTMP [APP-201] avoids routing of construction Heavy Goods Vehicles (HGVs) through the Central Norwich AQMA. Requirement 15 of the Draft DCO [AS-032] secures a Construction Traffic Management Plan. The BESS Containers / Compound will be a minimum of 200m from residential properties as set out in the Design Principles, Parameters and Commitments [APP-213]. Mitigation measures to reduce the impacts of dust during construction, operation and decommissioning, such as dust suppression techniques, are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Mitigation to reduce road traffic emission impacts on local air quality during construction, operation and decommissioning, such as Worker Travel Plans, are set out in the Outline CTMP [APP-201], Outline OTMP Plan [APP-202] and Outline DEMP [APP-198]. Following implementation of mitigation measures, no significant adverse effects are anticipated. Through avoidance measures and embedded mitigation, requirements for compensation have not been identified in relation to Air Quality. <u>Socio-Economics</u>

ExQ	Respondent	Question	Applicant's Response
			The mitigation hierarchy has been considered through the provision of the Outline Employment, Skills and Supply Chain Strategy [APP-205]. This serves as embedded mitigation, setting out how the employment benefits can be maximised for local residents. The detailed ESSCS is secured through Requirement 19 of the Draft DCO [AS-032]. Following implementation of mitigation measures, no significant adverse effects are anticipated. As identified in ES Volume 1, Chapter 14 – Socio-Economics [APP-050] the Scheme will result in significant beneficial effects relating to supporting jobs, provision of employment opportunities, and providing opportunities to upskill the local workforce. There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. The Applicant is engaging with Pulham Patch to understand the potential interaction between the Scheme and Pulham Patch. <u>Soils and Agricultural Land</u> With regards to avoidance and reduction, as set out in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] and Section 8.3 of the Planning Statement [APP-209], owing to the scale and nature of the Scheme and the proportion of BMV land in Norfolk, it has not been

ExQ	Respondent	Question	Applicant's Response
			possible to avoid BMV quality land entirely. However, the Order Limits mostly fall within the lowest category for the likelihood of BMV land in the wider area. Micro-siting to minimise the use of BMV particularly relates to fixed equipment and woodland planting. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. Embedded mitigation is outlined in Environmental Statement Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. In accordance with paragraph 5.11.12 of NPS EN-1, the likely or potential adverse effects have been minimised or avoided by good practice works embedded into the Scheme in the Outline CEMP Plan [APP-196] and the Outline SRMP [APP-204]. The Outline SRMP has been developed to help guide good practice and minimise potential effects on soils and agricultural land quality. The SRMP, which is required by DCO requirement 18 of the Draft DCO [AS-032], will follow the principles of the Outline SRMP [APP-204]. The loss of agricultural land cannot be compensated.

ExQ	Respondent	Question	Applicant's Response
			<u>Ground Conditions</u> Within the context of ground conditions, avoidance and reduction have been applied through optioneering and design optimisation to avoid potential geoenvironmental hazards where practicable, e.g., sources of potential contamination. Mitigation measures are as described in the Outline CEMP [APP-196], including ground investigation that will be undertaken post-consent. Examples of other mitigation measures secured through the Outline CEMP include a Foundation Works Risk Assessment, Hydrogeological Risk Assessment, occupational health and safety measures and PPE, and awareness briefings. No requirement for compensation has been identified, as this is not considered to be compatible with contaminated land policy, legislation, and guidance which required contamination to be managed such that land is suitable for use. Following implementation of mitigation measures, no significant adverse effects are anticipated. <u>Electromagnetic Fields</u> For overhead lines, a setback distance of at least 15m from the existing 400kV overhead cables is to be maintained between the overhead cables, and

ExQ	Respondent	Question	Applicant's Response
			receptors pertaining to human health. This represents an avoidance measure. For 132kV and 400kV underground cables, electric fields will be contained within the cable's protective insulation and sheath, and therefore there are no external electric fields and a setback distance from the underground cables is not required. All proposed cables will be 'UKCA' and/or 'CE' marked. Electrical fields from the underground power cables will be shielded by the surrounding cable duct and the conducting soil. This represents an embedded mitigation measure. No other embedded mitigation measures are necessary as the Scheme will be designed so that the maximum levels of electromagnetic radiation during construction, operation and maintenance, and decommissioning phases will be below ICNIRP reference levels. Apart from avoidance measures and measures embedded into the design, there are no other relevant environmental mitigation or enhancement measures considered to be required to control or manage EMF effects on human health. <u>Waste and Materials</u> The application of the mitigation hierarchy to waste and materials aligns closely with the Waste Hierarchy. As such, the following measures are

ExQ	Respondent	Question	Applicant's Response
			set out in Section 18.5 of ES Volume 1, Chapter 18. Other Environmental Matters [APP-054]: • Prevention / Avoid and Reduction: The Scheme design incorporates embedded prevention of waste through the predominant use of pre-fabrication. This approach reduces on-site construction waste and material use, with waste produced during unit manufacturing being managed by the companies producing the PV Panels, Mounting Structures, Battery Energy Storage System (BESS), temporary construction site office units, cabling, and (where practicable) substation infrastructure. • The location and consolidation of the Temporary Construction Compounds and welfare facilities will help minimise the amount of excavation and construction waste required for hardstanding for access, material storage, and welfare unit placement. This will reduce construction waste, wastewater, and electricity use. • Re-use / Reduction: In accordance with the waste hierarchy and the objective of minimising waste generation, uncontaminated excavated soil and stone is, where feasible, to be reused on-site. These control measures are set out in the Outline CEMP [APP-196] while

ExQ	Respondent	Question	Applicant's Response
			site storage measures are set out in the Outline SRMP [APP-204]. • The Outline OEMP [APP-197] and the Outline DEMP [APP-198] set out to maximise the recycling and reuse of Scheme components at the end of their life, and minimise electrical waste and recycle old panels in line with the WEEE Regulations (or equivalent legislation at the time of replacement or decommissioning). • PV Panels that have developed faults or damage can also be refurbished and repowered by specialist companies and manufacturers, then resold or reinstalled. As secured through the Outline OEMP [APP-197], the Applicant will adhere to the industry good practice outlined in Solar Power Europe's Lifecycle Quality Best Practice Guidance. • Recycling / Mitigation: Industry-standard practices and control measures, such as on-site material and waste management are secured through the Outline CEMP [APP-196] for construction, the Outline OEMP [APP-197] for operation, and the Outline DEMP [APP-198] for decommissioning. Main waste streams are to be separated on-site before transport to approved, licensed third-party waste facilities for recycling or disposal. A Site Waste

ExQ	Respondent	Question	Applicant's Response
			Management Plan (SWMP) is to be prepared ahead of construction, ahead of operation commencing, and ahead of decommissioning. - During decommissioning, all infrastructure will be removed, recycled, recovered, or disposed of in accordance with good practice and market conditions at that time. This is secured through the Outline DEMP [APP-198]. Together, these measures seek to mitigate the movement of waste being committed to landfill. A requirement for compensation has not been identified, as this is not considered to be compatible with the waste hierarchy or legislative requirements for waste products to be suitably handled. <u>Glint and Glare</u> The glint and glare assessment has considered the mitigation hierarchy for all receptors (roads, dwellings and aviation) assessed. - For roads, mitigation is considered if reflecting panel areas are within a road users field-of-view without significant factors that reduce the level of impact. Measures include changing the panel configuration embedded into the design, and screening provided by the Green Infrastructure Strategy [AS-005].

ExQ	Respondent	Question	Applicant's Response
			- For dwellings, mitigation is considered if the duration of effects exceed more than three months per year or more than 60 minutes on any day. Measures include changing the panel configuration embedded into the design, and screening provided by the Green Infrastructure Strategy [AS-005]. - For aviation activity, mitigation is considered if the glare intensity within a pilot's field-of-view is greater than the accepted intensity in accordance with the associated guidance and industry best practice. Mitigation measures include changing the panel configuration (height, tilt, azimuth angle) embedded into the design.
Q1.1.2	The applicant, South Norfolk District Council (SNDC), Block East Pye Solar, any Parish Council	Community Liaison Group Section 5.7 of the Planning Statement [APP-209] provides a general description of proposals for a community liaison group (CLG) with some limited further detail in the outline Construction Environmental Management Plan (oCEMP) [APP-196]. Requirement (R) 4 of the dDCO [AS-032] provides for the establishment of the CLG, including approval of the terms of reference. Notwithstanding the above, further details/ suggestions are now requested of the roles,	While noting that the final terms of reference would be subject to the post-consent discharge of the Draft DCO's [AS-032] Requirement 4, the Applicant envisages taking a similar approach to that of its Cottam and West Burton projects, where the local planning authorities have recently approved terms of reference. The aim of the CLG would be to provide a clear and constructive forum for exchange of information related to the development and construction of the Scheme.

ExQ	Respondent	Question	Applicant's Response
		responsibilities, participants and draft terms of reference of the proposed CLG in order to maximise its effectiveness during the construction process. This should also address how the CLG would effectively operate across the entirety of the area potentially affected by the proposed development.	In terms of membership, the Applicant would expect the CLG to include representatives drawn from the following, by nomination and subject to availability across the area potentially affected by the Scheme. • Relevant elected representatives as determined appropriate by South Norfolk and Norfolk County Councils (or any successor authorities in the event of local government reorganisation). • Representatives from those parishes within or adjacent to the Order Limits for the Scheme. • Where relevant, representatives of any other parish affected by construction-related activity (e.g. those on access routes for abnormal indivisible loads). • Emergency services and statutory agencies as identified in the DCO (e.g. Fire & Rescue, Ambulance, National Highways) and other relevant organisations where appropriate. • Co-opted members from relevant community organisations and special interest groups where appropriate, including those identified on an ongoing basis in response to emerging issues or topics.

ExQ	Respondent	Question	Applicant's Response
			• Co-opted representatives from construction contractors, where appropriate once construction works begin. The objectives of the group would be to: • Enable transparent, timely and effective communication on construction activities, programme, phasing, traffic management, environmental management and mitigation; • Provide an effective channel for community questions, concerns and feedback, ensuring these are responded to as required, whether within CLG meetings or outside them; • Support early identification of issues and collaborative problem-solving; and • Maintain constructive relationships with local communities and stakeholders throughout delivery of the projects. To that end, the CLG would: • Facilitate regular dialogue between the Scheme Undertaker, representatives of local communities and key stakeholders on pre-construction and construction progress; • Review and discuss matters relating to environmental management, traffic and access, farming and community impacts and

ExQ	Respondent	Question	Applicant's Response
			corresponding mitigation, and other matters identified in the DCO; • Agree timescales for providing additional technical information where required; • Identify emerging issues early and work together on appropriate responses; and • Support themed workshops on key topics (e.g. transport, ecology, construction phasing), where beneficial.
Q1.1.3	The applicant	Clarity and accessibility of works plans Several representations have been made by interested parties regarding the clarity and accessibility of the Works Plan (Part 1 and 2) [AS-002 and AS-003]. As discussed at the preliminary meeting, the applicant is requested to consider further ways of improving the clarity and accessibility of the Work Plans for interested parties. This should include consideration of ways of ensuring that the details of the proposed development, comprising the location of individual works and overlapping works, are presented in a clear, user-friendly manner. In particular, the applicant is requested to consider how the plans can be made easier to view and navigate for parties	This submission includes updates to the base mapping of Works Plan (Part 1 and 2) [EN0110014/EXAM/2.3]. Separately, the Applicant has also completed a wholesale review of the existing Works Plan in response to representations made. The outcome of this review is presented in this submission as Illustrative and Accessible Plans of the Proposed Works [EN0110014/EXAM/9.26]. These Plans are intended to be read alongside the existing Works Plan (Part 1 and 2) [EN0110014/EXAM/2.3]. They do not propose to replace the Works Plans which are the certified document for the purposes of the DCO, but the alternative plans are illustrative to help interested parties understand the works proposed. For example, the key been updated to make the plans

ExQ	Respondent	Question	Applicant's Response
		with limited internet speeds and/ or information technology capability.	more user-friendly for people who are colour blind. The file size has also been reduced. Key changes made as part of the accessibility review, represented in the Illustrative and Accessible Plans of the Proposed Works [EN0110014/EXAM/9.26] are as follows: • Significant reduction in overlay of Works using similar hatching styles; • Greater use of shading to distinguish more clearly by colour rather than hatching styles; 1.1.1 Reduction in the number of styles by amalgamation of Works where they coexist, e.g. Works 1 is always co-located with Works 7; and • Splitting out of the most complex area of Works overlays in Site 1 (1A, 1B, 1C) into separate sheets to improve clarity, but with clear indication that Works on those separate sheets could coexist. In respect of other aspects of accessibility: • Each sheet in Illustrative and Accessible Plans of the Proposed Works [EN0110014/EXAM/9.26] has been the subject of a colour vision deficiency simulator in GIS to

ExQ	Respondent	Question	Applicant's Response
			review readability for viewers who do not have full colour vision; and Revised colouration and hatching have been used to reduce file sizes substantially with no loss of sharpness in the .pdf format files. It is the Applicant's view that the alternative accessible format secures the objectives set out in the ExA's First Written Questions, including supporting clarity of multi-overlapping Works and by producing electronic (pdf) files that are more rapidly downloadable and/or more easily opened and viewed by those with reduced hardware or internet capability.
Q1.1.4	The applicant	Information request Block East Pye Solar's submission at procedural deadline A [PDA-079] in section 5 includes suggestions for four schedules of information it considers could helpfully be provided by the applicant. The applicant is asked to respond to each of these requests, providing any updated information and clarification on the matters raised, including where existing documents can be updated where this is appropriate and where any new documentation can be provided.	Block East Pye Solar's submission [PDA-079] at section 5 seeks the following four schedules of information: <i>A Scheme-to-powers and severability schedule:</i> <i>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 solution, that extra severability information has a particularly strong project-specific justification.</i>

ExQ	Respondent	Question	Applicant's Response
			2. 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. 3. 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. 4. 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 has addressed each Schedule in turn below:

ExQ	Respondent	Question	Applicant's Response
			1. A Scheme-to-powers and severability schedule The Applicant is seeking consent for the full scope of powers and works shown on the Works Plans [AS-002 and AS-003] and controlled through the Requirements contained within Schedule 2 of the Draft DCO [AS-032]. As is typical for nationally significant infrastructure projects, the Application has been assessed on a reasonable worst-case basis and seeks a maximum consenting envelope within which the final design will be developed. The authorised development does not require every Work to be constructed to its maximum extent, nor does it require every element of infrastructure assessed within the Application to be delivered. The relationship between the authorised works and the land and rights sought is established through the Works Plans [AS-002 and AS-003], Land Plans [APP-006], Statement of Reasons [APP-020] and Book of Reference [APP-022], which identify the land and rights required to facilitate the authorised development and justify the extent of powers sought.

ExQ	Respondent	Question	Applicant's Response
			The timing and sequencing of works is controlled through Requirement 2 of the Draft DCO [AS-032], which requires the submission of construction phasing details, including a construction timetable, to the relevant planning authority prior to commencement. Requirement 5 additionally requires detailed design approval before the commencement of the relevant works. In respect of the NGET substation and BESS elements specifically, the Applicant has addressed these matters in its response to Action Point 11 and Question Q1.2.2 respectively. Those responses explain the degree of design flexibility sought and the basis upon which the relevant powers have been requested. In practical terms, should any particular Work not be constructed, be delayed, or ultimately be delivered through a different design solution that remains within the parameters of the authorised development, the associated powers would simply not be exercised to the extent they are not required. This would mean that any environmental effects which may have arisen if those works were delivered, would

ExQ	Respondent	Question	Applicant's Response
			not materialise. The grant of powers through the DCO does not oblige the Applicant to exercise those powers in full, but rather enables delivery of the authorised development within the assessed and consented framework. The Applicant therefore considers that the information requested regarding the relationship between the authorised works, the powers sought, and the consequences of non-delivery of particular elements is already contained within the Application documentation and Draft DCO [AS-032], and that a separate scheme-to-powers or severability schedule is not necessary. 2. A consolidated maximum design and construction parameters schedule The maximum design parameters are set out within the Design Principles, Parameters and Commitments [APP-213] and are secured by Requirement 5 in the Draft DCO [AS-032]. The Environmental Statement for the Scheme has been undertaken based on the parameters and commitments set out within this document, in line with the Rochdale Envelope approach as detailed in ES Volume 1, Chapter 2 – EIA Methodology [APP-038].

ExQ	Respondent	Question	Applicant's Response
			The Design Principles, Parameters and Commitments [APP-213] presents parameters and commitments organised by Work Number in accordance with Schedule 1 to the Draft DCO [AS-032] and the spatial extents shown on the Works Plan [AS-002 and AS-003]. In relation to core working hours, working hours, HGV/AIL movements, HDD, dewatering, out-of-hours work and lighting, these matters are set out and controlled through the Outline CEMP [APP-196] and Outline CTMP [APP-201]. The Outline CEMP [APP-196] details the Avoidance Areas for trenchless crossing techniques such as HDD, which have informed assessments within the ES. As set out in the Outline CEMP [APP-196], the construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. However, the construction period will vary depending on detailed layout design and potential environmental constraints on the timing of construction activities. Additionally, the construction activities may vary across the Order Limits, depending on the detailed design.

ExQ	Respondent	Question	Applicant's Response
			The Applicant considers that, taken together, the Design Principles, Parameters and Commitments [APP-213], Works Plan [AS-002 and AS-003], and ES Volume 1, Chapter 4 – The Scheme [APP-040] already provide the consolidated reasonable worst-case parameters underpinning the EIA and secure their delivery through the Requirements in Schedule 2 to the Draft DCO [AS-032]. Controls on construction activities are set out within the Outline CEMP [APP-196], Outline CTMP [APP-201], ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203], Outline Soil Resource Management Plan [APP-204], and Commitments Register [APP-218]. Pursuant to Requirement 2 of the Draft DCO [AS-032], no part of the authorised development may commence until a written scheme setting out the phase or phases of construction of the authorised development has been submitted to the relevant planning authority. This must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing areas.

ExQ	Respondent	Question	Applicant's Response
			Pursuant to Requirement 5 of the Draft DCO [AS-032], no part of the authorised development may commence until the detailed design of the Scheme has been approved by the relevant planning authority. 3. A legal-plan reconciliation schedule The following plans will be certified as part of the made Development Consent Order (these are currently listed in the Draft DCO [AS-032] at Schedule 12), and as such could be described as the 'legal plans': • Access and Public Rights of Way Plan [APP-11] • Crown Land Plan [APP-008] • Hedgerow and Tree Protection Order Plan [AS-004 Rev 2] • Land Plan [APP-006] • Special Category Land Plan [APP-009] • Streets Plan [APP-010] • Works Plan [AS-002 and AS-003] Plans updated and submitted throughout the Examination will be listed in the Guide to the Application (Revision 3) [PDA-001] which will be submitted at each Deadline. In addition

ExQ	Respondent	Question	Applicant's Response
			superseded plans are indicated on the Examination Library, following the submission of documents at each deadline. Updates made to each plan are explained in the 'Schedule of Changes' table within each document. In addition, a Schedule of Changes is submitted alongside the Book of Reference each time it is updated, and submitted in to the Examination, which will enable Interested Parties to track those updates. 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 base maps using the most up to date OS data and which shows the Long Stratton Bypass. 4. An Environmental Interrelationships and Mitigation Consequences Schedule

ExQ	Respondent	Question	Applicant's Response
			The Applicant notes that the Environmental Statement has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and relevant Planning Inspectorate guidance. The Applicant has assessed the likely significant effects of the Scheme within the ES [APP-042 to APP-056] and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The proposed management and mitigation measures are secured through various outline management plans [APP-196 to APP-205]. The Commitments Register [AS-038] 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. Each time the Commitments Register is updated and submitted into the Examination, it will include a 'Schedule of Changes' and as such, this will enable changes to be tracked. The interrelationships between environmental topics have been comprehensively assessed within the Application documentation, as set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038], and ES Volume 1,

ExQ	Respondent	Question	Applicant's Response
			Chapter 19 – In-Combination Effects Assessment [APP-055] which has been prepared to address the interrelationship between individual development effects across environmental disciplines.
Q1.1.5	The applicant	Document numbering The paragraph numbering in section 4.3 of the Environmental Statement (ES) Chapter 4 (The Scheme) [APP-040] appears to restart from 4.3.1 on page 24. Please review and update where necessary to assist with any future references to the document.	The paragraph numbering in section 4.3 of ES Volume 1, Chapter 4 – The Scheme [APP-040] has been amended and will be submitted at Deadline 1.

2.2 Design, parameters and other details of the proposed development

ExQ	Respondent	Question	Applicant's Response
Q1.2.1	The applicant	Project lifetime Paragraph 2.10.57 of the National Planning Statement (NPS) for Renewable Energy Infrastructure (EN-3) - December 2025 says that an upper project lifetime limit of 40 years is typical, although applicants may seek consent without a time period or for differing time periods of operation. The applicant is asked to explain its reasoning behind its choice of a 60 year project lifetime in this case?	Paragraph 2.10.57 of EN-3 recognises that, whilst 40 years is a typical upper operational lifetime, applicants may seek consent for longer periods where justified. The Applicant considers that a 60-year operational lifetime is appropriate for the Proposed Development. A 60-year operational period is consistent with a number of recently consented solar NSIPs, including West Burton Solar Project, Cottam Solar Project, Tillbridge Solar Project, Mallard Pass Solar Project and Gate Burton Energy Park, all of which were granted consent on the basis of a 60-year operational lifespan. The proposed lifetime reflects the expected longevity of modern solar infrastructure, such as the substation components (switchgear, transformers) and cable system, and allows the Scheme to maximise renewable electricity generation, carbon reduction benefits and contribution to energy security over its operational life. At the end of the 60-year period, the Scheme would be decommissioned and the land restored in accordance with the requirements secured through the Draft DCO [AS-032].

ExQ	Respondent	Question	Applicant's Response
Q1.2.2	The applicant	Energy storage facility An energy storage facility comprising the battery energy storage system (BESS) is proposed through Work No.2. a) To what extent is the purpose of the energy storage facility to store energy from the proposed solar farm in comparison to a more general function in providing peak generation and grid balancing services to the National Grid? What is its expected storage capacity based upon the maximum design parameters? b) The applicant is requested to provide a reasoned justification to demonstrate that the entirety of the proposed energy storage facility in this case can be treated as associated development. This should take account of paragraphs 4.7 to 4.11 of The Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order (July 2026). c) Based on the maximum design parameters, what is the expected number of storage units that could be accommodated within Work No.2?	A) A Battery Energy Storage System (BESS) is proposed as associated development to the Scheme. The BESS is proposed to support the principal solar sites through their operational life by storing energy when it is generated in abundance, and releasing it to the grid when demand is higher. At times when the BESS is not supporting the operation of the principal solar site, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. In particular, Section 5.11 of the Statement of Need provides information on factors related to the size of a BESS. Alongside the export capacity secured through a scheme's grid connection agreement, the size of the import connection secured by connection agreement with NESO at the point of connection is also an important input into the maximum power capacity of the BESS proposed at a facility. Other physical parameters may control specific elements of a scheme, including parameters which will have the effect of capping the energy capacity of the

ExQ	Respondent	Question	Applicant's Response
		d) How does the Gate 1 prioritisation status with National Energy System Operator affect the delivery of the energy storage facility, including the potential timing of its implementation in relation to that of the remainder of the proposed development?	proposed BESS. For this reason, the BESS is proposed to have a power capacity of 500MW. ES Volume 1, Chapter 6 - Climate Change [APP-042] provides that the assessed energy capacity of the battery storage is 2,000MWh. According to these calculations, the BESS could deliver a carbon saving of approximately 957,849 tCO₂e over the Scheme's lifespan without accounting for any emissions as a result of the energy generation used to charge the BESS. However, to avoid potential double-counting of emissions savings, these additional carbon savings from operating the BESS have not been included in the overall GHG assessment for the Scheme. The assessment focuses on the primary emissions reductions achieved through energy generation alone. BESS designs are evolving and technology is advancing. As they do, energy density (MWh energy storage capacity per BESS Container) is increasing. Further, the Outline BSMP [APP-200] explains that NFCC guidelines have been complied with, and that NFCC guidance will be followed with any deviations fully discussed and agreed with the relevant safety authorities. This may include revisions to design parameters such as spacing between battery containers and therefore may

ExQ	Respondent	Question	Applicant's Response
			also impact the MWh capacity of the Scheme at a future time. For these reasons, energy storage capacity (expressed in MWh) is not a reasonable control parameter for the design of the BESS component of the Scheme nor the expected number of storage units. Rather, the candidate BESS design must not exceed the maximum parameters committed to within the DCO through Table 4.2 of Design Principles, Parameters and Commitments [APP-213]. The Applicant confirms that the assessed 2,000MWh of storage capacity represents a reasonable assumption of the energy storage capacity which may be accommodated within the maximum parameters committed to within the DCO through Design Principles, Parameters and Commitments [APP-213]. This has been derived from industry standard software and the Applicant's own design experience to prepare an indicative design for the BESS element of the Scheme (measured in MWh), using key inputs such as the Applicant's proposed plans, current BESS technology and knowledge of the Site. B) Paragraph 4.10 of The Planning Act 2008: Guidance on preparing an application: Part 3 –

ExQ	Respondent	Question	Applicant's Response
			Contents of a Draft Development Consent Order (July 2026) describes four tests for associated development. The tests are: • Direct Relationship: requires a direct relationship with the principal development. It should therefore either support the construction or operation of the principal development or help address its impacts. • Subordinate: should not be an aim in itself but should be subordinate to the principal development. • Not only additional revenue: should not be proposed as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of constructing or operating the principal development. • Proportionate in nature and scale: should be proportionate to the nature and scale of the principal development. Notably, the Guidance expressly confirms that "this principle should not be read as excluding any associated infrastructure development that is on a larger scale than is necessary to serve the principal development if that associated infrastructure provides capacity that is likely to be required for another proposed major infrastructure

ExQ	Respondent	Question	Applicant's Response
			project". This is relevant for the purposes of the new National Grid substation being proposed. The Explanatory Memorandum [AS-034] includes justification for BESS as Associated Development. Including, paragraph 3.1.7 which confirms that "the approach taken by the Applicant between those parts of the Authorised Development which form the NSIP and those parts that form Associated Development follows the approach taken by other DCOs to date, including the Cleve Hill Solar Park Order 2020, the Longfield Solar Farm Order 2022, the Gate Burton Energy Park Order 2024, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025, the East Yorkshire Solar Farm Order 2025, the Tillbridge Solar Order 2025 and the Fenwick Solar Farm Order 2026 each of which incorporate BESS (except East Yorkshire), grid connection infrastructure and mitigation and enhancement measures as associated development" In the context of the Scheme, the following points are noted: Direct Relationship: There is a direct relationship between the proposed BESS and the main solar site. When energy is generated

ExQ	Respondent	Question	Applicant's Response
			by the main solar site but is not immediately needed, the BESS will store that energy and will export it to the grid when needs are greater. This supports the operation of the Scheme by increasing its effectiveness, reducing the potential for wasted energy, and maximising a key benefit of the Scheme, being the level of carbon free energy sent to the grid. The BESS will also be capable of delivering support to the grid which will increasingly be needed to operate a low-carbon electricity system. This also supports the operation of the Scheme by increasing the security, reliability and flexibility of the system to which it connects and therefore is also demonstrative of a direct relationship between the BESS and the main solar site. Subordinate: The BESS is subordinate to the main solar site in that the principal benefit of the Scheme, being the generation of carbon free energy, derives from the main solar site (c.f. Paragraph 3.3.6 of EN-1 (2025)). The Scheme aims to meet the need for new energy generation on the grid by developing the main solar site with a co-located BESS. A standalone BESS development would provide benefits to the energy system but on its own would not generate low-carbon electricity. However, the BESS will store predominantly

ExQ	Respondent	Question	Applicant's Response
			low-carbon energy and therefore, the BESS is clearly functionally subordinate to the main solar site. Further, the BESS would operate in a subordinate fashion to the main solar site, in that the output from the main solar site would influence how the BESS could operate at any moment in time but the reverse would not be true. However, in practice, how the BESS would operate at any time would also depend on a large number of other factors including national demand, the weather, and the evolving composition of the future GB generation fleet. Not only additional revenue: Investing in unsubsidised solar is economically rational on a stand-alone basis and requires no cross-subsidisation financially to justify the cost of the principal development. For example, EN-3 Para 2.10.5 states: "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation". As such, the BESS is not only necessary as a source of additional revenue for the Applicant to cross-subsidise the cost of the main solar site, because no cross-subsidisation is necessary for the main solar site. The BESS supports the operation of the Scheme by increasing its effectiveness, reducing the potential for wasted energy, and

ExQ	Respondent	Question	Applicant's Response
			maximising a key benefit of the Scheme, being the level of carbon free energy sent to the grid. Proportionate in nature and scale: The BESS is proportionate to the Scheme in nature and scale. This is because: • The power capacity of the BESS matches the grid export capacity available to it; • Based on the indicative layout of the solar array and the BESS design parameters, the energy generated by the main solar site over the course of a day can regularly exceed the energy storage capacity of the BESS; and • The footprint of the BESS is much smaller than the footprint of the main solar site. C) The expected number of energy storage units based on the maximum design parameters is 544 no. D) The recently granted Beacon Fen DCO provides further support for the inclusion of the entirety of the BESS as associated development, notwithstanding that the BESS is capable of performing wider grid-support and system-balancing functions (noting that the BESS was 600MW and the solar generation was 400MW for Beacon Fen). Both the

ExQ	Respondent	Question	Applicant's Response
			Examining Authority and the Secretary of State assessed the BESS against the established associated development principles of direct relationship, subordinacy, proportionality and cross-subsidisation, and concluded that it remained associated development. In particular, the BESS was found to have a clear functional relationship with the principal solar generating station by increasing the effectiveness of renewable generation, reducing curtailment and maximising the export of low-carbon electricity. The fact that the BESS could also provide ancillary services to the electricity network did not alter that conclusion. The Secretary of State accepted that the principal purpose of the project remained the generation of renewable electricity and that the BESS was functionally subordinate and proportionate to that principal development. Beacon Fen therefore demonstrates that the ability of a co-located BESS to undertake additional storage and grid-support functions does not prevent it from constituting associated development where it remains directly related to, subordinate to and proportionate with the principal NSIP. Section 2.9 of the Statement of Need [APP-206] and paragraph 3.2.6 of EN-1 (2025) describe that the Connections Reform process

ExQ	Respondent	Question	Applicant's Response
			is not about stopping projects, but instead is about prioritising projects for 2030, while maintaining a robust pipeline of projects to deliver beyond 2030. The Government's Planning for New Energy Infrastructure confirms that "Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals." The Applicant therefore does not consider that the current Gate 1 for this BESS is an impediment to its inclusion as associated development in this Scheme, nor to its consent, should the ExA consider it appropriate to make that recommendation, and nor to its future delivery. This is supported by policy: Paragraph 4.11.6 of NPS EN-1 supports the principle that a connection offer is not required for consent. For example, "Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application". NESO indicate a connection date from 2031 to 2035 for the Gate 2 Phase 2 connection for the Scheme (although a fixed date has not yet

ExQ	Respondent	Question	Applicant's Response
			been communicated to the Applicant by NESO). ES Vol 1. Chapter 4 The Scheme indicates a construction plan duration of up to 24mths up to commissioning. The Applicant expects there to be future Connections Reform re-prioritisation rounds between consent (if granted) and construction commencing. The Applicant expects that the BESS (if consented) would be well placed to secure a Gate 2 agreement to coincide with the solar connection date and location at one such round (although this is clearly not guaranteed). Therefore, the Applicant assesses the Construction programme as appropriate for the Scheme based on its high-level planning assumptions. The Applicant therefore does not consider that NESO's Connection Reform prioritisation affects the delivery of the energy storage facility, including the potential timing of its implementation in relation to that of the remainder of the Scheme.
Q1.2.3	The applicant	Electrical cabling etc (including Works No.1 and Work No.6) Extensive electrical cabling is proposed throughout the Order limits, partly because of the spatial spread of the proposed development. These works appear to be included within Works No.1, Works No.6 and	The Applicant does not consider there is any unnecessary duplication across Works No.1, No.6, and No.7(j). However, there is some overlap due to the interactions between each Work package to allow for flexibility during the detailed design stage. Ultimately, they are distinct Work

ExQ	Respondent	Question	Applicant's Response
		Works No.7(7j). Please clarify any difference and whether there is any duplication.	packages which detail different aspects of the Scheme. The reasoning is as follows: • Work No.1(d) includes the electrical and communication cables connecting Work No.1(c) to Work No.3A and 3B. This is the cabling between components like switch rooms or conversion units and the project substations detailed in Work No.3, which is not repeated in other work packages as it solely relates to the Work No.1. It also details different methods of installation between PV panels and mounting structures, Conversion Units, and substations. • Work No.6 details the construction methodology and the components that make up the cable system up to 400kV connecting Work No.3A and 4. Additionally, for up to 132kV cables for connecting Work No.3A and 3B and Work No.1(c) to Work No.3A and 3B. As discussed, it details the compounds necessary to deliver the Works, as well as other features like access tracks necessary for construction.

ExQ	Respondent	Question	Applicant's Response
			Work No.7(j) details the electricity and communication cables similarly to Work No.1 but with focus on commitments on micro siting the cabling and trenchless techniques. This applies to cabling Works across the Scheme as so was stipulated within Work No.7 so to avoid duplication. Ultimately, Work No.1(d) details the cable system associated with the PV areas connecting into the project substations. Work No.6A details construction methodology and components necessary to lay the cable connecting the 400kV project substations and the National Grid substation. Work No.6A does similarly but instead the 400kV project substations and the 132kV project substations as well as the solar sites to the project substations. Work No.7(j) then details commitments on micro siting the cable as well trenchless techniques which applies to the wider cable system. As such, each work package is distinct from the other and so necessary to defined separately to provide the Applicant enough flexibility to deliver an efficient electrical design.
Q1.2.4	The applicant	Joint bays and link boxes (Work No.6) The proposed joint bays would be up to 20 metres (m) long, 7m wide and 3m deep as	a) Paragraph 3.3.4 of ES Volume 1, Chapter 3 - The Order Limits [APP-039] states that the <i>'Cable Route Corridor runs between the 10</i>

ExQ	Respondent	Question	Applicant's Response
		set out in the Design Principles, Parameters and Commitments [APP-213]. They are also proposed to be a minimum of 250m to a maximum of 500m apart. a) What is the maximum number of joint bays expected to be required for the proposed development? b) Taking account of their extent and maximum number required, how have they been assessed within the relevant topic areas of the ES? c) A description and reasoning for the link boxes is not included in ES Chapter 4 - the Scheme [APP-040]. For the avoidance of doubt, the applicant is requested to update this and provide an illustrative section drawing of a typical link box. d) What are the maximum dimensions of the proposed link boxes and what is the maximum number that are expected to be required?	<i>Sites (approximately 24km)'. The ES considers the maximum parameters of the Scheme adopting the Rochdale Envelope approach. Ultimately, the exact amount will be determined at the detailed designed stage post-determination. As such, the ES has assessed a worst case scenario of a joint bay every 250m across the CRC. This means there would be a maximum of 96 joint bays within the Scheme.</i> b) This is addressed under relevant environmental topic headings below: <u>Ground Conditions</u> Within ES Volume 1, Chapter 16 – Ground Conditions [APP-052] the joint bays have been assessed as a part of the cable route corridor (CRC). It is however recognised that the CRC has currently been referenced within the chapter as a 2m deep trench, however the joint bays will locally extend to 3m deep. Notwithstanding this, the Design Principles, Parameters, and Commitments [APP-213] identifies the maximum design parameters for the Scheme, and the conclusions within ES Volume 1, Chapter 16 – Ground Conditions [APP-052] remain valid and robust in respect of the maximum Scheme parameters.

ExQ	Respondent	Question	Applicant's Response
			The assessment of the effects of exposure to existing potential contamination through ground disturbance are sensitive to the location of Sources of Potential Contamination (SPC). The former RAF Seething is the only identified SPC that interfaces with the CRC, within CRC14. At CRC14 the underlying Diamicton is (as shown on ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108] anticipated to be in excess of 10m thick. When considering an excavation depth of 3m for the joint bays: • The proposed mitigation is unchanged. • The sensitivity of the identified receptors is unchanged. • The nature of the source of potential contamination is unchanged. • The potential contamination migration pathways are unchanged. • The assessed risk to the identified receptors does not change. • The magnitude of effect is therefore unchanged. The assessment of likely significant effects associated with sterilisation of safeguarded

ExQ	Respondent	Question	Applicant's Response
			minerals is unchanged as the Scheme still temporarily sterilises the safeguarded minerals resources, and the proposed mitigation as described in the Outline CEMP [APP-196] remains unchanged. The assessment of likely significant effects associated with loss of peat soils is unchanged. Peat soils have not been identified outside of CRC7. Horizontal Directional Drilling is proposed beneath the peat soils in CRC7 and therefore joint bays will not be present in this area. Whilst the assessment text refers to the 2m CRC depth rather than the 3m joint bay depth, this does not result in any change to the environmental effects identified or their significance. As such, the assessment remains robust and reflective of the consent envelope sought. <u>Water Environment:</u> The joint bays are underground structures constructed to a depth of 3m which is within the Diamicton geology, and as such are not considered to affect groundwater flood risk/groundwater table and will not locally affect flood risk from other sources. Whilst joint bays are not directly referenced or specifically identified within ES Volume 1, Chapter 9 – Water Environment [APP-045], they have been

ExQ	Respondent	Question	Applicant's Response
			considered and assessed as part of the wider Scheme, within the chapter, and given their nature and the embedded mitigation, no significant adverse effects are identified. <u>Ecology and Biodiversity</u> The joint bays and trench depth are not specifically identified within the ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], however, the 50m working width within the CRC (and associated works) were assessed within the chapter which inherently captures the joint bays. Where required, wider survey areas have also been applied to the CRC, these survey areas vary between ecological receptor, and are detailed within Table 8.7: Ecological Survey, Methodology and Schedule of the chapter. Given the nature of the proposed works, the 50m CRC working area, and the embedded mitigation detailed within the Outline CEMP [APP-196], no significant adverse effects are identified. <u>Cultural Heritage:</u> The joint bays are not specifically identified within the ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by the Environmental Statement Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 and AS-021]. The full

ExQ	Respondent	Question	Applicant's Response
			length of the CRC and a working width of 50m, plus a study area of 500m around the CRC was assessed. Geophysical survey along the working width of the full length is also currently being undertaken with to inform the strategy for further evaluation and mitigation as identified in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. There is potential for the installation of the cable, including the joint bays, to disturb or remove below-ground archaeological remains which will be found at the interface between topsoil and subsoil with the underlying natural at c0.3m depth below the ground surface generally. Therefore, the intrusive groundworks for the cable installation at 2m depth or the joint boxes at 3m depth will be through into the natural underlying geology and, therefore, be at a lower depth than any archaeological remains. The intrusive works are therefore all considered to have the same impact to archaeological remains regardless of depth. However, it is intended that such remains will be avoided by any intrusive works so as to preserve in situ and, where this is not possible, mitigated by excavation to preserve by record. As such, the residual effects are not significant. <u>Air Quality</u>

ExQ	Respondent	Question	Applicant's Response
			A construction dust risk assessment is provided in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]. The construction dust risk assessment considers earthwork activities, including excavation of the joint bays, across the full length and width of the CRC. The greatest dust emission magnitude category (large magnitude) and maximum level of risk (high risk) from the Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' (2024, V2.2) have been assigned to the proposed earthworks activities in the construction dust risk assessment. Construction dust mitigation measures for high risk earthworks activities are included in the Outline CEMP [APP-196]. <u>Noise and Vibration</u> The Applicant has not scoped out construction trenching or jointing activities. Construction noise and vibration effects remain within the scope of the ES and have been assessed in accordance with the adopted methodology. However, the quantitative calculations presented within ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-099] focus on activities with the greatest potential to give rise to significant effects, including Horizontal Directional Drilling

ExQ	Respondent	Question	Applicant's Response
			(HDD) crossings, which involve more intensive plant and can remain in a fixed location for extended periods. Works associated with cable excavation, installation and jointing would progress incrementally along the cable route and would therefore be transient in nature at any individual receptor. The duration of these activities at a given location is not expected to exceed 10 days in any 15 consecutive day period. The construction noise assessment methodology identifies significant effects where moderate or major impacts persist for 10 or more days in any 15 consecutive day period, or for more than 40 days in any six consecutive months. Consequently, although trenching and jointing activities have been considered as part of the overall construction noise and vibration assessment, they are not expected to result in significant effects at receptors due to their temporary, localised and short-duration nature. Construction noise would be controlled through the Outline CEMP [APP-196] which includes measures to manage and reduce noise and vibration effects during construction. These measures include controls on plant and equipment, working methods, maintenance, and site management practices, ensuring that

ExQ	Respondent	Question	Applicant's Response
			construction activities are undertaken in accordance with relevant good practice and that potential impacts on nearby receptors are minimised. <u>Climate Change:</u> The Applicant has considered the construction, operation and maintenance, and decommissioning periods of the Scheme in ES Volume 1, Chapter 6 - Climate - Change [APP-042], including the underground cable infrastructure to which the joint bays relate. Joint bays were not assessed as a separate component within the assessment or specifically referenced. Instead, they were considered as part of the wider cable route corridor and construction activities. Section 6.9.47 identifies the estimated ground material expected to be excavated during the construction phase. Whilst joint bays were not specifically identified within the calculations, excavation for the joint bays are assumed to be considered in the quantum of excavation material to be included within the overall quantities of material assessed so they have been assessed. Table 6.4 identifies that during the operational phase there is an allowance for one replacement of the substation subject to performance or health and safety reasons, as such any electrical cabling and associated joint bays impacted by the

ExQ	Respondent	Question	Applicant's Response
			substation replacement may also be replaced once. It is noted though that cabling it is not anticipated to be replaced during the Scheme aligning with assumptions on replacement rates outlined in ES Volume 1, Chapter 4 - The Scheme [APP-040]. Therefore, joint bay replacement will only be as aforementioned relative to the substation infrastructure and cabling requirements through the operational and maintenance phase. Table 6.30 identifies that during the decommissioning phase of the Scheme, joint bays have been considered within the general assumptions made for the removal of onsite products and materials and associated waste. <u>Transport and Access:</u> The Applicant has assessed the joint bays as part of the overall cabling and Cable Route Corridor for the Scheme rather than as a separate component. Therefore, the joint bays have been assessed during construction, operation in ES Volume 1 Chapter 11 – Transport and Access [APP-047] supported by ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174-177], Outline CTMP [APP-201], Outline PRoWPPMP [APP-203] and Outline OTMP [APP-202]. Together they set out the assessment methodology and the

ExQ	Respondent	Question	Applicant's Response
			management and mitigation measures for the Scheme including the joint bays. <u>Materials and Waste</u> Joint bays have not been independently assessed in the assessment of waste and materials presented in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. These instead have been considered in the quantum of excavation material that is likely to be generated by the Scheme during construction. In accordance with the waste hierarchy and the objective of minimising waste generation, uncontaminated excavated soil and stone is, where feasible, to be reused on-site. <u>Soils and Agricultural Land</u> The Applicant has considered the construction, operation and maintenance, and decommissioning periods of the Scheme in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] including the underground cable works. Jointing bays were not described as a separate component within the assessment as they were considered within the wider cable works, the details of which are not yet determined. Effects arising from cable works are considered in section 15.8 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Subject to good

ExQ	Respondent	Question	Applicant's Response
			practice, as controlled through measures within the Outline SRMP [APP-204] and the detailed SRMP which is required by DCO requirement 18 of the Draft DCO [AS-032], the cabling works are temporary and reversible and are therefore considered to be of low magnitude. Cabling works will impact on agricultural land of high, medium and low sensitivity, accordingly there are no significant effects on agricultural land quality. Jointing bays will be located so far as possible in field edges and unfarmed parts of fields. c) and d) A description and reasoning for the link boxes has now been included in ES Volume 1, Chapter 4 – The Scheme [APP-040] and an illustrative drawing is provided in ES Volume 3, Appendix 4.1 - Illustrative Technical Information [APP-117]. Additionally, as link boxes are a component of the joint bay, they will always sit within the footprint of the joint bay, whose maximum dimensions are secured in the Design Principles, Parameters and Commitments [APP-213]. As such, it is not considered necessary to define and secure the maximum dimensions of the link boxes.
Q1.2.5	The applicant	Water storage facility	Consistent with the Rochdale Envelope approach adopted for the Scheme, Table 4.2 of the Design

ExQ	Respondent	Question	Applicant's Response
		Table 4.2 of the Design Principles, Parameters and Commitments [APP-213] sets out the parameters and commitments for Works No.2. In relation to the water storage facility, the table does not specify how much water would be required to be stored on site. Should a figure be included? If not, why not?	Principles, Parameters and Commitments [APP-213] secures the physical envelope of the water storage facility rather than an operational volume figure, as the water storage facility forms part of the firefighting water supply provision for Work No. 2(h) which will be finalised at the detailed design stage. The Applicant draws attention to ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164], which confirms that the Scheme will have a separate fire suppression water allowance of 456m³ or 456,000 litres. This allows for 1,900 litres per minute flow for 4 hours and is based on current NFCC guidelines. The Outline BSMP [APP-200] further states that each firefighting water storage unit would contain no less than 230,000 litres in capacity. As set out at Paragraph 4.5.8 of the Outline BSMP [APP-200], the drainage design will provide sufficient capacity in the 1 in 100 annual probability +45% allowance for climate change event plus the 456m³ firewater volume. The containment system will therefore provide storage for this volume in combination with the defined rainfall allowance. ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164] also confirms that water storage is also being considered for both non-

ExQ	Respondent	Question	Applicant's Response
			potable supply (through rainwater harvesting) and potable supply (to reduce the amount of tanker vehicles in the area). The maximum amount of water required to be stored, ranges depending on the time period considered. If considering non-potable supply over the entire winter period (3 months), an estimate of 12,555 m³ is additionally required based on the local rainfall assessment undertaken in the ES. Potable supply for a month would require an estimate of 213 m³ of storage based on the projected water demand estimates for the scheme. This results in approximately 4,863 m³ of storage per month to cover non-potable (4,185 m³/s), potable and fire suppression. All water would need to be stored separately. Therefore, fire suppression represents the minimum amount of water required and is recommended to be stored in two tanks to provide redundancy. This minimum volume has therefore been assessed within the Application documentation, but has not been included as a fixed parameter in Table 4.2 because the final configuration and detailed hydraulic design of the containment and firewater systems within the BESS Compound are matters to be agreed with NRFS at the detailed design stage.

ExQ	Respondent	Question	Applicant's Response
Q1.2.6	The applicant	Lighting Paragraph 4.3.30 (page 31) of ES Chapter 4 (The Scheme) [APP-040] states that lighting is not required within the solar photovoltaic (PV) arrays for the operational phase. Lighting of the project substations, National Grid substation and BESS would be in accordance with health and safety requirements, particularly around emergency exits where there would be lighting similar to street lighting that operates from dusk. Paragraph 4.3.31 states that motion sensing lighting will be implemented in the substations and BESS and other critical infrastructure to be used only for maintenance and security purposes. a) Would all the lighting be operated by motion sensing or only lighting needed for maintenance and security purposes? b) Can you clarify whether there would be any permanent lighting? If so, where would it be located? c) It is acknowledged that there is reference to lighting in the management plans (including the oCEMP [APP-196] and the outline Operational Environmental Management Plan (oOEMP) [APP-197]) although this appears high level. Given	a) Any new permanent lighting within the BESS and substations will be installed for maintenance and security purposes only. Lighting will be motion sensor controlled and will remain off by default, activating only when movement is detected. The lighting will automatically switch off after an appropriate period during which no further movement is detected. b) Permanent lighting will be provided for maintenance and security purposes within the BESS compounds and substations. The lighting will be motion sensor controlled such that it remains off during periods when the Site is unmanned and is only activated when required. Luminaires will be positioned around the perimeter of the compounds and oriented inwards, with shielding measures incorporated, where necessary, to reduce light spill and minimise effects beyond the Site boundaries. c) and d) At the detailed design stage, lighting design drawings will be developed in accordance with the relevant British Standards and ILP guidance. These drawings will incorporate lighting calculations and lux contour plots to demonstrate that the required lighting levels can be achieved whilst

ExQ	Respondent	Question	Applicant's Response
		there is no specific requirement within the dDCO for lighting and the lighting strategy is not a certified document, however the lighting strategy states at paragraph 1.1.7 that detailed lighting design would be developed at the detailed design stage, can you clarify how details of lighting would be secured and whether this should be in a single document? d) Does further detail on lighting need to be added to the Design Principles, Parameters and Commitments [APP-213] to reflect the type of lighting proposed?	minimising light spill towards adjacent boundaries and sensitive receptors. Paragraph 2.6.1 of the Outline Construction Environmental Management Plan (CEMP) [APP-196] states '<i>Lighting will be required during construction for safety reasons but will be temporary in nature and predominantly limited to the core working hours. Any requirement for lighting outside standard working hours will be set out within the detailed CEMP and implemented in accordance with the Requirement of the draft DCO [EN0110014/APP/3.1]. The principles for lighting relating to construction activities, as set out in ES Volume 3, Appendix 7.11 – Lighting Strategy [EN0110014/APP/6.3.7.11], will be adhered to.</i>' Paragraph 2.7.4 of the Outline Operational Environmental Management Plan (OEMP) [APP-197] states that '<i>Lighting for the operational phase will be substantially in accordance with the principles for lighting as set out in ES: Volume 3, Appendix 7.11 – Lighting Strategy [EN0110014/APP/6.3.7.11]</i>'. Approval of the detailed CEMP and OEMP by the relevant planning authority is sought under Requirements 13 and 14 of the DCO, and as described above, controls on lighting (as set out in ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]) will be included as part of

ExQ	Respondent	Question	Applicant's Response
			these plans. As such the Applicant considers sufficient controls are in place to ensure the type of lighting measures described above will be delivered. It is not necessary for the controls to be duplicated in the DPPC because the lighting measures are already subject to the approval of the relevant planning authority in discharging the CEMP and OEMP.
Q1.2.7	The applicant	Solar panel replacement and maintenance Paragraph 4.5.32 of ES Chapter 4 - The Scheme [APP-040] assumes that the operational life of solar panels is 40 years and that all panels would be replaced once and that the BESS could be replaced up to five times during the operational phase. Can you confirm the following: a) Whether replacement solar panels and BESS units, including those replaced at year 40 and as part of routine maintenance, would be the same specification as those initially installed? b) If replacements differ from those initially installed, what implications this could have, for example might the PV solar arrays/ BESS area be different? c) How would any changes to the specification or technology of the solar	a) Modules to be replaced as part of routine maintenance would initially be from the spares stock held on-site. These spares would be the same specification as those installed initially and would be part of the same order. Upon site-wide replacement, the modules would likely be a different model due to evolving technologies and supply chains, however these modules would need to remain compatible with the mechanical and electrical infrastructure on-site, and thus would remain compatible with the parameters set out in the Environmental Statement. Similarly, while a spares stock is unlikely to be held on-site for the BESS units, replacements for units and internal components within the BESS site as part of routine maintenance would be the same specification as those installed initially. When conducting site-wide replacements the specification may differ due

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		panels or BESS during the operational period be managed and secured within the dDCO?	to evolving technologies and supply chains, but the weights and dimensions would need to be similar to comply with the requirements for the foundations, the units would need to be compliant with the BSMP, and the noise level would need to remain compatible with the parameters set out in the Environmental Statement. b) If replacements are to differ from those initially installed, then to remain compliant with the electrical, mechanical, and civil design of the balance of plant the differences will be minor and there will be no material difference to the PV solar arrays and BESS area, which will remain compatible with the parameters set out in the Environmental Statement. c) Any changes to the specification or technology of the solar panels or BESS during the operational period would remain firmly controlled through the dDCO requirements regime and could not be implemented at the undertaker's discretion. First, the dDCO requires the authorised development to be carried out in accordance with details approved by the relevant planning authority. For example, Requirement 5(3) provides that the authorised development must be carried out in accordance with the approved

ExQ	Respondent	Question	Applicant's Response
			detailed design, while Requirement 14(4) requires the Operational Environmental Management Plan to be implemented as approved. This means that the approved specification and design parameters are secured through the requirements process and remain subject to planning authority oversight throughout the project's lifetime. Secondly, where an amendment to an approved specification, technology or document is sought, Requirement 3 establishes another clear approval mechanism. Any proposed amendment must be submitted to, and approved by, the relevant planning authority before it can take effect. Following approval, the amended details become part of the approved documents governing the development. Importantly, that power to approve amendments is expressly constrained. Under Requirement 3(2), the relevant planning authority may only approve an amendment where it is satisfied that the amendment is unlikely to give rise to any materially new or materially different environmental effects compared with those assessed in the Environmental Statement. This ensures that any future technological evolution, equipment replacement or specification refinement remains within the

ExQ	Respondent	Question	Applicant's Response
			environmental envelope assessed through the DCO process. Accordingly, the dDCO secures a robust two-stage control: the initial approval of the technology and design by the relevant planning authority, followed by a formal approval process for any subsequent amendments. The Order therefore provides certainty that any future modifications to the solar panels or BESS will be subject to regulatory scrutiny and can only be approved where they do not result in materially new or materially different environmental effects.
Q1.2.8	The applicant	Construction compounds and laydown areas Clarify the following and provide further information in relation to construction compounds and laydown areas. At present, the construction compounds referred to in documents such as the outline Construction Traffic Management Plan (oCTMP) [APP-201] and oCEMP [APP-196] do not appear to be explicitly referred to in the dDCO [AS-032] and there is mainly reference to laydown areas: a) What is the distinction between construction compounds, construction	a) Construction laydown areas and construction compounds are interchangeable terms for the same thing. The Works Numbers, as set out in Schedule 1 of the Draft DCO [AS-032] provide for the following works in respect of laydown areas (or construction compounds): - 'temporary construction laydown areas' (Work No 4B (relating to the National Grid Substation) and Work No 5C (relating to the overhead line works); - 'temporary construction and decommissioning laydown areas' (Work No. 6A and 6B (relating to underground

ExQ	Respondent	Question	Applicant's Response
		laydown areas and secondary laydown areas, including the different functions and proposed use of each type of area? b) Can further information on the secondary laydown areas be provided, such as within the oCTMP [APP-201] or the Design Principles, Parameters and Commitments [APP-213]? c) Is the intention that temporary construction compounds would be authorised under Works No.8 of the dDCO, which refers to temporary laydown areas but does not expressly refer to temporary construction compounds, whereas the Design Principles, Parameters and Commitments [APP-213] at table 4.8 refers to temporary construction and decommissioning compounds? d) Why are temporary laydown areas included within Work No.8 and also other individual works (Works No.4, No.5 and No.6) of the dDCO? Is there duplication?	cables within the defined area of the Cable Route Corridor) and Work No. 8 (relating to temporary construction and decommissioning laydown areas within the solar sites); and - 'secondary temporary construction and decommissioning laydown areas' within Work No 7(k). The 'temporary construction and decommissioning laydown areas' would constitute the larger more substantive compounds that would be established for the duration of the construction phase (and decommissioning if relevant) and may incorporate hardstanding, car parking, areas to store materials and equipment, site and welfare offices and workshops, security infrastructure, including cameras, perimeter fencing and lighting, drainage and waste management infrastructure (including sewerage); and electricity, water, waste water and telecommunications connections. Illustrative examples of the 'temporary construction and decommissioning laydown areas' are given at section 6 of ES Volume 3, Appendix 4.1 – Illustrative Technical Information [APP-117] and shown on the Works Plans [AS-002 & 003] and indicatively on ES Volume 2. Figure 4.2 Indicative Temporary Construction Compound Locations [APP-060].

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			The 'secondary temporary construction and decommissioning laydown areas within the solar sites, may also include for storage of materials, fuel, equipment needed for works, welfare facilities and office space (office space will be required to avoid unnecessary internal movement of personnel over long distances). These will typically be set up ahead of the installation of the Solar PV modules, electrical components and cabling and will be decommissioned as the relevant works in their locality progress and become completed. b) The Applicant has updated the Design, Principles, Parameters and Commitments [EN0110014/EXAM/7.18] at Deadline 1 to include controls on secondary laydown areas. c) As noted in our response to point a) above Work No. 8 will authorise 'temporary construction and decommissioning laydown areas'. This is the same as what has been referred to as 'Temporary Construction and Decommissioning Compounds' in table 4.8 of the DPPC. The Applicant has reviewed the terms used in the OCTMP [APP-201], and Design Principles, Parameters and Commitments [APP-213] ('DPPC') and has updated the terms used in those documents to

ExQ	Respondent	Question	Applicant's Response
			ensure consistency with the DCO works powers. d) The laydown areas within Work Nos. 4B and 5C are ancillary to the National Grid works described more widely within those works numbers and are required solely for the construction phase of those works. As temporary construction facilities, they do not form part of the operational development and no separate decommissioning provisions are required within the DCO. By contrast, the laydown areas authorised under Work Nos. 6A, 6B and 8 are required to support both the construction and decommissioning of the Scheme. They would be available only for the duration of those activities and would be restored to their previous condition after construction and again following decommissioning, as secured through the relevant DCO requirements and the commitments within the OCEMP [APP-196], ODEMP [APP-198] and OCTMP [APP-201]. The inclusion of laydown areas under multiple work numbers does not result in any duplication of powers. Rather, the drafting distinguished where laydown areas are ancillary works which may be

ExQ	Respondent	Question	Applicant's Response
			required to facilitate different principal elements of the authorised development (Work No. 4 and 5) or where they are required in their own right (Work No. 7(k) and 8). Their inclusion alongside the relevant work powers ensures that suitable temporary construction and decommissioning areas are available to support each principal work, such as the new National Grid substation authorised under Work No. 4, as well as the wider scheme.
Q1.2.9	The applicant	Construction compound – site 5 Following a question raised by Morningthorpe and Fritton Parish Council at Issue Specific Hearing 1, could the applicant provide further information on the purpose and function of the construction compound at site 5? In particular, please explain how materials delivered to this compound will be managed, including whether they will be distributed to other construction locations across the scheme or used solely to support construction activities at site 5.	The Temporary Construction Compound in Sub-Site 5A is associated with the works for the 400kV substation and solar installation in 5A and 5B. The compound will only be used for works in Sub-Site 5A and 5B and will not be used for distributing materials to other construction locations. Materials delivered to the compound will be stored and managed within the compound area.
Q1.2.10	The applicant	Design and the experience of public rights of way (PRoW) users Paragraph 6.3.22 of the Design Approach Document [APP-212] says that the oCEMP and Outline Public Right of Way Management Plan require the applicant at	a) The experience of the PRoW users is considered within the design, a minimum 15m offset from the PRoW is included in the Design Principles, Parameters and Commitments [APP-213] . The application has been developed and assessed on the

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		detailed design stage, to give further consideration to the experience of people using the PRow, including (but not limited to) the layout of PV arrays within individual fields, the siting of conversion units/ switch rooms and substations. a) The applicant is asked to explain, why this consideration has not already been carried out as part of the initial preparation, assessment and design of the application, rather than leaving it to the detailed design stage? b) Explain what measures, including in relation to the layout of the different elements of the development, might be implemented in the detailed design submissions following consideration being given to the experience of people using PRow?	basis of the maximum design parameters sought through the Development Consent Order. At this stage, the precise arrangement of infrastructure within individual fields, including the exact layout of PV arrays, the location of conversion units, switch rooms, ancillary infrastructure, fencing and landscape mitigation, has intentionally retained a degree of flexibility to allow detailed micro-siting during detailed design. Therefore, the requirement within the Outline OEMP[APP-199] and Outline PRowPPMP [APP-203] for further consideration at detailed design stage is not intended to revisit the principle of the layout, but rather to refine the approved design to secure the best possible outcome for PRow users having regard to the final detailed arrangement of infrastructure and mitigation. b) Detail design parameters as set out in Tables 4.1 to 4.11 of the Design Principles, Parameters and Commitments [APP-213] that may be implemented in the detailed design, to account for PRow users include: Careful siting of ancillary infrastructure, include fencing, standalone conversion units, integrated conversion units, switch rooms and other ancillary structures away from key receptor locations on PRow to be

ExQ	Respondent	Question	Applicant's Response
			in keeping with the prevailing surrounding environment. Refinement of the appearance, materials, type, colour, surfacing and offsets BESS infrastructure, Substations and ancillary compounds within the approved development areas to reduce visibility from nearby PRow and recreational routes. The design parameters and commitments set out would be secured by Requirement 5 in the Draft DCO [AS-032].
Q1.2.11	The applicant	PV arrays adjacent to PRow Based on the design parameters, the applicant is requested to provide an illustrative cross-section showing PV arrays, and other works such as fencing, closed circuit television cameras and landscaping adjacent to PRow's. This should include relevant separation distances notated on the cross-section drawing(s).	An illustrative cross-section is provided in Appendix 4.1 - Illustrative Technical Information submitted at Deadline 1 [EN0110014/EXAM/6.3.4.1].
Q1.2.12	The applicant	Buffers Table 3.2 of the Design Approach Document [APP-212] lists the minimum offsets/ buffers from existing features. Can you clarify where these distances would be measured from,	The minimum offsets are measured from the edge of the identified features. The Design Principles Parameters and Commitments [APP-215] has been updated at Deadline 1 to clarify this point. These buffers have been used to inform the maximum development scenarios spatially represented within the Works Plans.

ExQ	Respondent	Question	Applicant's Response
		for example fenceline, midpoint, and update the relevant documents as necessary.	
Q1.2.13	The applicant	Scheme vision Paragraph 3.6.4 of the Design Approach Document [APP-212] sets out the scheme vision to 'contribute to delivering the UK's transition to delivering the UK's transition to decarbonised and low-cost renewable energy provision whilst leaving a positive legacy of benefits for the people'. Can the applicant explain how this 'positive legacy of benefits for the people' would be achieved in this case?	The context within which this scheme is coming forward is one of rapid climate change. The world is warming and will continue to warm until carbon emissions are sufficiently reduced. International relations have become tensioned, and international supplies of energy have been constrained, resulting in additional cost to consumers. Yet society continues to require secure energy supplies, for our communications, transport, industrial processes, heat, light, entertainment and comfort. The Statement of Need [APP-206] explains that urgent and unprecedented actions are required on a global scale to halt climate change. Section 2.2 of the Statement of Need sets out some of the destructive and harmful effects which have recently arisen from a warming climate. Section 4.3 of the Statement of Need explains that around 30% of inflation in 2022 came from energy bills rising. The Scheme will, if consented, contribute to the achievement of government objectives to deliver sustainable development that enables decarbonisation. By doing so, the Scheme will help to address the climate change emergency that affects everyone's lives and the environment,

ExQ	Respondent	Question	Applicant's Response
			by ensuring our energy supply is secure, low carbon and low-cost. To succeed in this task would undoubtedly deliver a positive legacy of benefits for the people. As set out in Section 5.6 of the Planning Statement [APP-209] and Section 6.3 of the Design Approach Document [APP-212], the Scheme delivers a range of localised benefits alongside its wider national contribution to decarbonisation including employment generation, skills and training, permissive paths and community accessible space, together with ecological and landscape enhancements through a Green Infrastructure Strategy. Ecological and Landscape Enhancements The Scheme's Project level design principles seek to retain and enhance existing vegetation, as far as practicable, together with creating green infrastructure, restoring habitats and enhancing biodiversity. Design buffers (offsets) as described in the Design Principles, Parameters and Commitments [APP-213] have been embedded into the design to retain key landscape features. These buffers are secured by Requirement 5 of the Draft DCO [AS-032]. As part of the Green Infrastructure Strategy [AS-005], landscaping features would retained as

ExQ	Respondent	Question	Applicant's Response
			far as practicable and be enhanced, such as through strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree, woodland and wildflower or species rich mix grassland, together with the restoration of ghost ponds, where practicable. Skylark mitigation plots would also be provided. This would collectively strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure. The Green Infrastructure Strategy illustrates that approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. The landscape and ecological management of the Scheme during construction and operation of the Scheme is set out in the Outline LEMP [APP-199] which is secured via Requirement 7 in the Draft DCO [AS-032]. Biodiversity Net Gain The Scheme has the potential to deliver Biodiversity Net Gain (BNG) as set out in the Biodiversity Net Gain Report [APP-218]. The ecological mitigation and enhancement within the Scheme (based on the Order Limits) is able to deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses. Requirement 9 of the Draft DCO [AS-032] commits to delivering a minimum

ExQ	Respondent	Question	Applicant's Response
			net gain of 10% for habitats, a minimum net gain of net 10% for hedgerow and a minimum net gain of 10% for watercourses. Permissive Paths New permissive paths would be created in Sub-Sites 7F, 8B and 10B, as shown in ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These permissive paths, which would connect to existing PRow, would collectively help to strengthen the network of greenways and active connections within the landscape. This would positively contribute to amenity and recreational opportunities and benefit local pedestrian users by providing alternative access routes to the local highway network. This would also indirectly benefit the health and wellbeing of the local users. Within Sub Site 7F, opportunities for ecological enhancements also exist by diverting users of the existing PRow away from the adjacent SSSI through the creation of permissive paths through grassland. The design and implementation of the permissive paths, together with their long-term management, is set out in the Outline PRowPMP [APP-203] and Outline LEMP [APP-199], with the detailed plans to be prepared substantially in accordance with these outline documents and

ExQ	Respondent	Question	Applicant's Response
			approved pursuant to Requirements in Schedule 2 to the Draft DCO [AS-032]. Work No. 11 of Schedule 1 to the Draft DCO [AS-032] provides for creation of permissive paths. The parameters and commitments for the permissive paths are secured in Table 4.11 of the Design Principles, Parameters and Commitments [APP-213]. These parameters and commitments are secured through Requirement 5 of Schedule 2 to the Draft DCO [AS-032]. Community Accessible Space The Scheme would include the provision of up to 19.8ha of new community accessible spaces for pedestrian use over the lifetime of the Scheme in Sub-Site 4B and Sub-Site 7F, as indicated in ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. This is included under Work No.11 (b) in the Draft DCO [AS-032]. The long-term management framework is secured through the Outline LEMP [APP-199], secured via Requirement 7 of the Draft DCO [AS-032] which sets out the objectives and targets of the community accessible space, together with a framework for the management during the operation of the Scheme. Employment Generation and Gross Value Added

ExQ	Respondent	Question	Applicant's Response
			As set out in the Outline Employment, Skills and Supply Chain Strategy (Outline ESSCS) [APP-205] during the construction phase, the Scheme is expected to support an equivalent to 233 full-time equivalent (FTE) jobs, peaking at an equivalent of 604 FTE jobs. It has been estimated that 360 net direct jobs and 684 net indirect and induced jobs would be created during the construction phase, totalling 1,044 net additional jobs. The Scheme is estimated to generate £137m in Gross Value Added over the construction phase. Approximately 120 net direct jobs are estimated during the operational phase based on the peak replacement scenario. Requirement 19 of the Draft DCO [AS-032] secures an employment, skills and supply chain strategy which must be substantially in accordance with the Outline ESSCS [APP-205]. Education and Skills Training As set out in the Outline ESSCS [APP-205] the Applicant is committed to apprenticeships in addressing both skill shortages and to provide local residents with pathways into meaningful employment. The Applicant is also committed to maximising benefits to local workforce and businesses and will secure a Skills, Supply Chain, and Employment Plan in accordance with the Outline

ExQ	Respondent	Question	Applicant's Response
			ESSCS [APP-205] to support partnerships with local businesses. This plan is intended to enhance local education, skills and attainment during construction and for periods of replacement activities during the operational phase of the Scheme. The Scheme will support a variety of supply chain opportunities for local businesses. It is anticipated that local suppliers will be utilised when acquiring certain materials and components. This will create partnerships between different stakeholders locally and in turn stimulate economic activity. Requirement 19 of the Draft DCO [AS-032] secures an employment, skills and supply chain strategy which must be substantially in accordance with the Outline ESSCS [APP-205]. Part 3 of Requirement 19 states: <i>'Any plan under this paragraph must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with that part of the authorised development and the means for publicising such opportunities.'</i> Community Benefit Fund The Applicant has also committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be

ExQ	Respondent	Question	Applicant's Response
			considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.
Q1.2.14	The applicant, Norfolk County Council (NCC) and SNDC	Design Approach Document [APP-212] and Design Principles, Parameters and Commitments [APP-213] The applicant and local authorities are requested to engage with the aim of ensuring that the design principles, parameters and commitments are appropriately worded so that there can be appropriate certainty regarding the future submission of detailed design proposals and the achievement of good design. An update on this engagement is requested at deadline 1.	The Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on the design principles for the Proposed Development. A meeting was held on 28 September 2026 to discuss the level of detail and certainty provided by the Design Principles, Parameters and Commitments [APP-213] document, including the design and finishes of infrastructure, the interaction between the National Grid substation and landscape planting, fencing and other mitigation. The Councils agreed to provide examples of design principles used on other schemes for the Applicant to review. The legal controls for detailed design, including those applicable to the National Grid substation, are also being considered through ongoing discussions on Requirement 5 of the Draft DCO [AS-32], with further engagement between the parties' legal advisers to take place. Updates relating to these design matters will be updated in the Design Principles, Parameters and Commitments [APP-213] at a later deadline following engagement with both NCC and SNDC.

2.3 Site selection and alternatives

ExQ	Respondent	Question	Applicant's Response
Q1.3.1	The applicant	Site selection following the change in grid connection strategy The applicant is requested to explain, with reference to the evidence base underpinning their submitted site selection documents [APP-041] [APP-215] and subsequent design evolution, why the proposed development remains a reasonably practicable and robust solution following the transition from the originally proposed point of connection to Great Moulton. The response should identify the principal evidence that demonstrates that a fresh site selection exercise centred on Great Moulton would not have resulted in a materially different scheme, site extent, or project configuration.	ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] explain how the site selection process responded to the change in the proposed Point of Connection (PoC) from Norwich Main Substation to land south of Great Moulton. Concurrently with the discussions with National Grid in respect of connecting into the Norwich Main Substation, the Applicant identified an initial 20km search radius from the Norwich Main Substation for solar sites to be included in the Scheme. Applying Stages 1 to 4 of the site selection assessment as explained in the Site Selection Assessment, the Applicant identified suitable solar site locations within this 20km search radius. The Applicant's written summary of oral submissions of ISH1 and the Site Selection Assessment explain why those sites are considered suitable in recognition of the national policy site selection criteria. Those documents also explain why a 20km search radius is suitably precautionary. The sites which were identified from the Norwich Main substation also all lie within 20km from the new

ExQ	Respondent	Question	Applicant's Response
			PoC location south of Great Moulton, and are therefore still viable sites with clear justification when considering the national policy tests which had already been applied. The suitability of the Sites which comprise the Scheme against environmental and technical considerations is set out within Paragraphs 5.1.3 to 5.1.9 of the Site Selection Assessment [APP-215]. In summary: The identified sites are all located within 20km of the Norwich Main Substation (a fact which remained to be true from the adjusted point of connection) and are therefore considered to be within a commercially viable distance from the Point of Connection, taking into account the generating capacity of the Scheme, underground cable costs, capital costs and market conditions. The design evolution set out in the Design Approach Document [APP-212] and Section 5.7 of ES Volume 1, Chapter 5 [APP-041] demonstrates that the Scheme has been iteratively refined in response to the confirmed PoC location. Sites 1 and 2 were added to the Order Limits following the change of the Point of Connection, grouping solar PV infrastructure around the PoC. Norfolk represents a good location within the UK to construct a utility-scale solar project as it

ExQ	Respondent	Question	Applicant's Response
			benefits from higher levels of irradiance compared to other parts of the UK and has potential availability of large areas of flat land. The Sites are generally flat or gently undulating, which is suitable for solar energy and generally consist of open rural fields with limited tree cover and woodland parcels. Therefore, overshadowing and shading from nearby land uses was not considered to be an issue. • The Scheme Sites (as initially put forward at EIA Scoping) comprise a total area of 1,168.3ha (excluding the Cable Route Corridors (CRC), BESS site, and initial National Grid Substation site presented at EIA Scoping) and is therefore able to accommodate a solar farm of 500MW. Following the design evolution of the Scheme, where areas of Solar PV infrastructure were removed to provide buffers and offsets, the total area of Work No.1 and related infrastructure remains sufficient to deliver a 500MW generation capacity. • The Sites are not located within any statutory or non-statutory environmental designations. The majority of the Sites are located within Flood Zone 1. The Site selection has been directed to areas of the lowest likelihood of BMV relative to the wider search area. The design response within each Site has been

ExQ	Respondent	Question	Applicant's Response
			informed by a rigorous process of environmental assessment and surveying which has informed buffers and setbacks integrated into the layout in accordance with the mitigation hierarchy (refer to the response to Q1.1.1). The conclusions of the Environmental Statement have been accounted for within the planning balance set out within the Planning Statement [APP-209], which concludes that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case. Other relevant considerations, including the accessibility of the Scheme for construction traffic from the Strategic Road Network via the A140, land use, and proximity to dwellings are set out within the SSA [APP-215]. In terms of the robustness of the site selection following the identification of the Point of Connection through the proposed National Grid Substation south of Great Moulton, the Applicant's position is that the Sites remain to be suitable – using the same search area from the new point of connection would have identified the same suitable sites as identified from the initial point of connection. Even though additional suitable sites may arise within that new 20km search radius, paragraph 4.3.9 of NPS EN-1 is explicit in stating

ExQ	Respondent	Question	Applicant's Response
			that “<i>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</i>”. Paragraph 4.3.24 continues 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>”. In other words, the site selected has been identified as suitable under the policy tests, by reference to its actual point of connection. If other sites are suitable from that point of connection (or not), does not impact the suitability of those sites. Notwithstanding the above but recognising that “<i>Applicants are obliged to include information about the reasonable alternatives they have studied in their ES</i>” (para 4.3.15 NPS EN-1), evidence base underpinning why the Scheme remains a reasonably practicable and robust solution is set out in Stages 5 and 6 of the Site Selection Assessment [APP-215], which validated the previously identified sites against the

ExQ	Respondent	Question	Applicant's Response
			new PoC and considered any potential alternative sites: • There are no brownfield or Previously Developed Land sites within 20km of the proposed National Grid Substation that have been identified as capable of being integrated into the Scheme, as set out in Table 4.3 of the Site Selection Assessment [APP-215] (NPS EN-3 Paragraph 2.10.23); • Stage 5 of Site Selection Assessment [APP-215] considers Potential Development Areas (PDA's) for the location of the Scheme, by applying the key operational criteria for large scale solar development, as well as the avoidance of ALC Grades 1, 2, and 3 (undefined Grade 3a or 3b) in line with NPS EN-3 Paragraph 2.10.23. All of the PDA's therefore have been identified by the Provisional ALC Mapping. Paragraphs 5.1.10 to 5.1.28 of the Site Selection Assessment [APP-215] consider these PDAs and concludes that whilst land within them could contribute land to the Scheme; or in isolation or combination, could provide sufficient land to accommodate the Scheme, none of the land was found to be more suitable or available. A Predictive Agricultural Land Classification Map (Defra, 2026) for England was published

ExQ	Respondent	Question	Applicant's Response
			by Defra in May 2026, after the site selection process was undertaken which estimates that most of Norfolk is now predicted BMV, and that the PDAs initially considered as non-BMV, are now identified as comprising BMV. Stage 5 therefore confirms that a fresh exercise centred on non-BMV land in line with NPS EN-3 Paragraph 2.10.23 within 20km of the proposed National Grid Substation would likely not have resulted in a materially different scheme, site extent or project configuration. • Stage 6 of the Site Selection Assessment [APP-215] broadly considers land within four Alternative Development Zones within the 20km search area from Great Moulton to enable consideration of the suitability of the Scheme land, when compared to other land which may be similar or closer to the proposed PoC at the National Grid Substation within ALC Grade 3 (undefined Grades 3a or 3b). Constraints within these ADZs were considered at a high level within Table 5.1 of the Site Selection Assessment [APP-215], and Paragraph 5.1.33 acknowledges that land within the ADZs may be suitable for solar development. However, the Applicant concluded that they are likely to perform no better than the chosen Scheme sites, which were considered to be suitable, and notably the Applicant is not able to

ExQ	Respondent	Question	Applicant's Response
			demonstrate that such sites are more suitable or available for the Scheme. Policy in NPS EN 1 is clear in that site selection work should be undertaken on a proportionate basis and that any alternative would need to be a reasonable alternative (and would be expected to deliver the same capacity in the same timeframes). NPS policy does not require the 'best site' and the sites which had already been identified from Stage 4 above all lie within 20km from the PoC location south of Great Moulton, and were therefore considered to still to be viable. • In accordance with the <i>'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land'</i>, paragraph 8 provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. This gives clear support in favour of development where land is secured voluntarily. In other words, if there are multiple suitable sites available from an environmental, technical and commercial perspective in accordance with national policy, those with reduced reliance on compulsory acquisition powers are favourable. Further details of this approach are set out in the Statement of Reasons [APP-018]. Therefore,

ExQ	Respondent	Question	Applicant's Response
			while other land parcels within 20km of the proposed National Grid Substation may feasibly host Solar PV arrays (something which Stages 5 and 6 indicated was not the reality), the Sites comprising the Scheme would nonetheless be suitable in light of the compulsory acquisition guidance because that land was secured under voluntary agreement. • In relation to landscape and visual impacts, it is acknowledged at NPS EN-1 Paragraph 5.10.5 <i>'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation'</i>. Within the 20km search area from Great Moulton, there are multiple small settlements and individual dwellings across the landscape, so it is not considered proportionate to re-consider site selection on this basis, given an alternative Scheme on this scale will likely lead to adverse impacts on the landscape. The Scheme is not located within a statutory landscape designation, and consideration of potential landscape and visual impacts have informed the design evolution of each Site. • In relation to whether a more consolidated layout would represent a more reasonably practicable and robust solution, in many cases,

ExQ	Respondent	Question	Applicant's Response
			it is not possible to have contiguous sites or land parcels in close proximity due to environmental, planning, and land constraints. The Applicant did not identify one single site of completely contiguous land parcels in the site selection process. While a single site would potentially reduce the overall cable route distance, many consolidated routes have an extensive run to the Point of Connection. The Cable Route Corridor has been designed to minimise environmental impacts while maximising efficiency, energy generation potential. Secondly, a consolidated site may concentrate effects into one location and has a higher risk of impacting receptors. The Sites selected for the Scheme avoid key statutory designated sites, and have been iteratively designed through an environmentally-led process in accordance with the mitigation hierarchy to provide appropriate, bespoke mitigation in each Site. A more consolidated Site layout may reduce this flexibility to respond to environmental constraints. The Applicant has selected land that can deliver the benefits arising from the generating station, as well as for the cable route corridor and the any necessary mitigation, within the range proposed in Paragraph 2.10.9 of NPS EN-3.

ExQ	Respondent	Question	Applicant's Response
			In response to the part of the EXA's question that states '<i>...evidence that demonstrates that a fresh site selection exercise centred on Great Moulton would not have resulted in a materially different scheme, site extent, or project configuration</i>', the Applicant advises: A fresh site selection exercise centred on Great Moulton would follow the same process as that outlined in Stages 1-3 of the Site Selection Assessment [APP-215], with the same environmental, technical, and land factors applied. The Sites would still emerge as being suitable from this process, given that they fall within the 20km search radius from the Great Moulton point of connection and outside of key designations and they were identified as being available through negotiations with willing landowners (reducing reliance on compulsory acquisition powers). 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>' The Sites have been the subject to an environmentally-led iterative design evolution process throughout the pre-application stage

ExQ	Respondent	Question	Applicant's Response
			where the environmental impacts assessment process has informed the design of mitigation and removal of areas from the Order Limits which has informed the conclusion that the beneficial effects of the Scheme outweigh the adverse effects in the overall planning balance. There is no definition of “proportionate manner” provided in NPS EN-1 paragraph 4.3.22. The Applicant considers that sufficient detail must be provided in order for the Secretary of State to form a view on whether any identified alternative sites are important and relevant for their decision. This is reflected in Paragraph 4.3.25 of NPS EN-1: <i>‘Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.’</i> In line with national policy, the Applicant has demonstrated a reasonable and proportionate consideration of alternatives for the Scheme.
Q1.3.2	The applicant	Relative influence of environmental and deliverability considerations The applicant is requested to explain the relative influence of environmental assessment, engineering requirements, grid connection considerations, landowner	The relative influence of environmental, operational, and land considerations is set out within the Site Selection Assessment [APP-215]. The initial technical and operational consideration is the Point of Connection. The capacity of the electricity grid is recognised by government and

ExQ	Respondent	Question	Applicant's Response
		willingness, and land availability in the identification and selection of the Order limits. In particular, the applicant should clarify whether the preferred site was selected principally because it represented the environmentally preferable option or because it offered operational, engineering and grid connection advantages, and whether environmental suitability or land availability was ultimately the determining factor in defining the proposed development.	industry as being the single biggest obstacle to the deployment of renewable energy. However, as noted in Paragraph 2.10.11-12 of NPS EN-3, irradiance is a key consideration in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance levels are in turn affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south facing aspect more likely to increase year-round irradiance levels. The area within Norfolk was therefore identified as suitable given the identification of a potential grid connection, and the irradiance levels of the wider region. From this initial key consideration, which defines the study area in which the Applicant can consider potential suitable sites, the site selection process is environmentally-led. In practice and at a very early stage in the scheme identification process, the Applicant used existing and publicly available environmental mapping data as well as internal GIS mapping tools to gather planning, environmental and technical constraints (designations, topography for example) within proximity of a <u>potential</u> Point of Connection, prior to applying for any grid connections (which in this case the Applicant initially did in 2022 as set out in the Site Selection Assessment [APP-215]). Consideration of the constraints information

ExQ	Respondent	Question	Applicant's Response
			enables the Applicant to not only approach NGET re. the POC; they are also able to instruct agents, site finders, and contacts that the Applicant may have, to start the site identification process. Land that comes before the Applicant from these searches are then reassessed against the constraints information in the same way. The Applicant uses consultants to draw this together in a report to validate the exercise prior to commencing the planning process. See the Applicant's response to Action Point 4 in Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Responses to Action Points [EN0110014/EXAM/9.17]. Stage 2 of the Site Selection Assessment [APP-215] sets out a high-level assessment of the area of search, using publicly available data and an assessment of local and national planning policy to exclude planning, environmental or spatial constraints from the area of search. This informed strategic-scale decisions about the location of the Scheme. For example: • Avoidance of proximity to large urban areas e.g. Norwich and Wymondham; • Avoidance of statutory landscape designations (the Broads);

ExQ	Respondent	Question	Applicant's Response
			• Avoidance of statutory ecological designations (SSSIs, SPAs, SACs) • Avoidance of Scheduled Monuments, Conservation Areas, and large clusters of Listed Buildings • Consideration of non-BMV land in line with the policy preference to direct site selection towards the lowest grade agricultural land. The Applicant consulted the Provisional ALC Mapping and 'Likelihood of BMV' mapping which showed very limited extents of land with a low likelihood of BMV. • Avoidance of Flood Zones 2 and 3 • Preference for flat land (areas of generally steeper topography to the north were avoided) Stage 3 of the site selection sets out the key operational criteria for large scale solar development – site size and land assembly; and topography to identify potential suitable sites for solar within the search area. The Site size required to deliver a 500MW generation capacity meant brownfield sites or commercial rooftops were not considered suitable in accordance with paragraph 4.3.27 of NPS EN1, which states '<i>Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable</i>'

ExQ	Respondent	Question	Applicant's Response
			<i>or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'</i> These environmental considerations informed the Applicant's approach to Stage 4, which is the stage at which land agents were used to identify land parcels which may be available through landowners willingly entering into voluntarily land agreements. The land agents used their professional knowledge to provide details of potentially willing landowners with large scale land holdings within the 20km area. From this search and further discussions with landowners (sites that now form the Scheme sites) were identified within unconstrained, ALC Grade 3 land. The process of identifying these land parcels, and the subsequent discussions with landowners were informed by the areas identified by the Applicant as being potentially suitable sites based on the avoidance of key constraints. As noted above, a desktop assessment of these sites was undertaken against the development constraints of these particular areas and against a range of planning, environmental and operational considerations with regard to relevant national and local planning policy and the optimal functionality of a large-scale solar development.

ExQ	Respondent	Question	Applicant's Response
			Consideration was given to the desirability of compiling a site in as few land ownerships as possible to avoid extensive cable routing between sites, while also avoiding environmental constraints within the cable route corridor. As set out within the Site Selection Assessment [APP-215], this process was applied to all Sites identified. Sequentially, Sites 3-10 were identified initially. A separate process was followed for the identification of the initial location for the National Grid Substation, which was led by the proximity to the overhead lines, accessibility from the SRN, and compliance with the Horlock / Holford rules. Sites 1 and 2 were subsequently added to the Order Limits through a review of suitable land in proximity to the Order Limits to accommodate ancillary infrastructure. In practice, therefore the consideration of environmental constraints and consideration of land availability in proximity to the Point of Connection overlap at Stage 4, which is available in proximity to the identified Point of Connection. As is evident from the mapping within the Site Selection Assessment, the exclusion of constraints at a high level does not identify a singular environmentally preferable option at this stage, as the exclusion of the key environmental and planning constraints using strategic-level desk-

ExQ	Respondent	Question	Applicant's Response
			based reviews means there is still a broad extent of land that could potentially accommodate solar development within the wider search area. However, in combination with the involvement of land agents identifying available land parcels within the land considered to be suitable, this Stage concludes with Sites that are identified as suitable against the key environmental, technical, and operational criteria. The initial site selection is only the start of the process, and establishes a basis for further refinement and the design evolution of the Scheme. As set out within the Design Approach Document [APP-212], the outcomes of the EIA have informed key design decisions. These include the removal of solar PV from Site 6 and its retention as agricultural land, and the removal of an area of Site 3, as well as the exclusion of areas identified as ALC Grade 2 (BMV) where possible. These decisions have been made in accordance with the mitigation hierarchy and have been informed by the outcomes of surveys and assessment which go beyond what is achievable and proportionate to undertake at a strategic level. While these decisions may not fall under the initial site selection, they demonstrate consideration of the environmentally preferable option at each stage of the development of the Scheme.

ExQ	Respondent	Question	Applicant's Response
			There is no policy requirement to demonstrate that the chosen option represents the best option from a policy perspective. National policy further recognises that all land may be needed for future infrastructure projects. As discussed in the response to Q1.3.1, the Applicant has complied with the relevant national policy tests in relation to site selection and the consideration of alternatives.

2.4 Aviation

ExQ	Respondent	Question	Applicant's Response
Q1.4.1	The applicant	Aviation safeguarding and aviation safety The ExA notes the submission of the Applicant's Position Statement on Aviation at Procedural Deadline A [PDA-006], which provides additional information regarding aviation safeguarding and aviation safety matters. The ExA welcomes the further explanation provided. However, aviation safeguarding remains a key matter arising from RRs and discussions at issue specific hearing 1, and the ExA considers that further clarification and consolidation of the applicant's case would assist the examination and ensure that the effects of the proposed development on aviation interests are fully understood. The applicant is therefore requested to provide a comprehensive response which demonstrates the progress made since submission of the application and clearly explains the current position regarding aviation safeguarding. In particular, the applicant should: a) Identify all elements of the proposed development that may affect aviation interests, including solar arrays, BESS	a) The Applicant has acknowledged the potential impact of the Scheme upon pilots in the context of: • Glint and glare, as a result of solar reflections from solar panels • Land available for an emergency landing following an engine failure (for powered aircraft) or glider launch failure (for gliding / non-powered aircraft), as a result of the scheme (all elements) physically occupying space • Thermal updraft, understood to be the result of wasted energy by the solar panels • Wind shear and turbulence, understood to be the result of the solar panels as a physical obstruction in free space For glint and glare [AS-025 to AS-029], the Applicant has undertaken an assessment of a 1-mile splayed final approach path and final sections of visual circuits. These sections are considered to be the most critical stage of flights (when a pilot is attempting to land) and was derived from the industry-standard methodology of assessing the final 2-mile

ExQ	Respondent	Question	Applicant's Response
		infrastructure, substations, buildings and any other relevant structures. b) Provide a consolidated explanation of the assessment undertaken in relation to emergency landing scenarios, engine-failure-after-take-off scenarios, glider launch failure scenarios, and turbulence and wind-shear effects. c) Respond in detail to the matters raised by the General Aviation Awareness Council in its RR [RR-0664] and during issue specific hearing 1, including concerns regarding the safeguarding of Tibbenham and Seething airfields, emergency landing areas, the location of solar arrays, BESS infrastructure and substations, and aviation safety risks associated with engine-failure scenarios. d) Confirm whether the applicant intends to prepare and submit a consolidated standalone aviation safeguarding and aviation safety document during the examination and, if not, explain why this would not assist the ExA and the Secretary of State for Energy Security and Net Zero.	approach path for licensed aerodromes, and consultation with the Civil Aviation Authority Airfield Advisory Team (disbanded in April 2025). The Applicant has used all available resources in accordance with CAP 793 to consult with the aerodromes identified for assessment. Consultation was undertaken with Norfolk Gliding Club operating at Tibenham Airfield, and Seething Airfield. For Tibenham Airfield specifically, the Applicant had consulted with Norfolk Gliding Club to obtain their specific flying activities to assess, as it is understood that they accommodate for both powered and gliding aircraft. The details obtained included specific lengths of circuits and approaches, widths of circuits, and descent gradients. In total, 38 specific circuit paths and approaches for Norfolk Gliding Club have been assessed; included in ES Appendix 18.1 – Glint and Glare Assessment Parts 1 to 5 [AS-025 to AS-029]. b) There is no known guidance in the United Kingdom or internationally pertaining to the Engine Failure After Take-off (EFATO) and Glider Launch Failure (GLF) effects of solar developments upon aviation operations. The Combined Aerodrome Safeguarding Team

ExQ	Respondent	Question	Applicant's Response
		The response should clearly identify any outstanding disagreements and explain how the applicant intends to address them during the examination.	(CAST), supported by the Civil Aviation Authority (CAA), have published Advice Note 5 that outlines safeguarding considerations for solar developments but does not provide specific details or prescribe a specific methodology. For EFATO and GLF, the CAST Advice Note 5 refers to a 90-degree sector (defined as 45 degrees either side of the extended runway centreline) that a pilot would consider in the event of looking for an available area to land in the event of an emergency. The Applicant's consultant had undertaken consultation with pilots and aerodrome operators to inform their methodology to assess this consideration in a general sense and not specifically for this scheme. Consultation with pilots and aerodrome operators suggested that the sector was smaller at 60 degrees (defined as 30 degrees either side of the extended runway centreline). The Applicant has considered both a 90- and 60-degree sector in their assessment [APP-222]. There is no guidance to inform the lateral distance that EFATO and GLF considerations should be considered. 'The Glider Pilot's Manual 4th Edition' by Ken Stewart outlines that GLF can be considered as a failure of the

ExQ	Respondent	Question	Applicant's Response
			launch from the point after the wheels leave the ground until the aircraft reaches a height of 300ft above the ground. Given that at its closest, the Scheme measures 1.5km from threshold 26, the Applicant has assessed a conservative distance of 2km. This is considered conservative as a pilot would need to achieve a climb ratio of 1:16.4 to reach a height of 300ft within a 1.5km (4921.3ft) lateral distance. Given that there are existing roads and dwellings between Tibenham Airfield and the Scheme, it would not be appropriate for a pilot to fly a 1:16.4 climb ratio. There is no known guidance in the United Kingdom or internationally pertaining to the thermal and wind shear / turbulence effects of solar developments on aviation operations. The Applicant has considered an assessment area of 90m, derived from 20 times the maximum 4.5m height of proposed panels. The assessment methodology is informed by CAA CAP 764, which states 'a distance of 8-12 rotor diameters downstream of the wind turbine is a distance at which the turbulence effects are not expected to affect conventional aircraft flying' and the Applicant's consultant's own industry experience of assessing these impacts. It should be noted that the CAP guidance refers to wind turbines; therefore, the distance of 20

ExQ	Respondent	Question	Applicant's Response
			times that maximum height used represents a highly conservative case as wind turbines are significantly larger than solar panels and buildings; in addition to also having moving components. The Applicant's assessment of both Tibenham Airfield [APP-222] and Seething Airfield concluded that the Scheme was not predicted to impact Norfolk Gliding Club's options following EFATO & GLF, thermal updraft, wind shear and turbulence. The Applicant has implemented a clearway for Seething Airfield to mitigate the impacts of EFATO from runway 24 at Seething Airfield. c) The General Aviation Awareness Council are understood to reiterate the concerns raised by Norfolk Gliding Club. The Applicant refers to its previous responses to both (a) and (b). The Applicant has assessed the aviation safety risks associated with engine-failure scenarios for both Tibenham Airfield and Seething Airfield. The Applicant's assessment of both Tibenham Airfield [APP-222] and Seething Airfield concluded that the Scheme was not predicted to impact Norfolk Gliding Club's options following EFATO and GLF. The Applicant has implemented a clearway for

ExQ	Respondent	Question	Applicant's Response
			Seething Airfield to mitigate the impacts of EFATO from runway 24 at Seething Airfield. d) The Applicant's position in respect of aviation safety is already set out in the Applicant's Position Statement on Aviation [PDA-006]. A separate Aviation Impact Assessment would use information already presented in the existing glint and glare [AS-025 to AS-029] and investigative [APP-222] reports, and therefore would not be beneficial. The Applicant has arranged a meeting 14 October with NGC and GAAC to discuss the topic. Any updates can then be captured at future deadlines.

2.5 Climate change

ExQ	Respondent	Question	Applicant's Response
Q.1.5.1	The Applicant	Greenhouse gas assessment and climate resilience Paragraph 6.5.16 of ES Chapter 6 (Climate Change) [APP-042] assumes a projected operation and maintenance phase of the scheme for 60 years and the climate change resilience assessment also considers an expected lifespan of 60 years (paragraph 6.5.49) for the purpose of the environmental impact assessment (EIA). However, some elements of the proposed development would be permanent, such as the National Grid substation. Therefore, has the ES assessed the reasonable worst-case scenario in terms of impacts from emissions, as well as climate change resilience for the lifetime of the proposed development? Could you explain whether extending the assessment period would materially alter the conclusions of the greenhouse gas assessment or climate change resilience assessment and justify why 60 years is considered an appropriate assessment period?	The Applicant has assessed a reasonable worst-case approach over a 60-year operational lifespan which represents the defined design life of the Scheme in alignment with ES Volume 1, Chapter 4 - The Scheme [APP-040] and forms the basis of ES Volume 1, Chapter 6 - Climate Change [APP-042]. The greenhouse gas assessment considers all phases of the Scheme that can be reasonably defined and assessed and uses assumptions for carbon intensity to ensure emissions are not understated. The climate resilience assessment similarly considers the Scheme throughout its operational life and assesses the potential effects of future climate hazards. Paragraphs 6.9.11 and 6.9.21-6.9.24 of ES Volume 1, Chapter 6 - Climate Change [APP-042] acknowledges that elements of National Grid infrastructure will remain, with construction and operational effects of that infrastructure included within the assessment. Decommissioning of the National Grid infrastructure has not been considered as the infrastructure is not being removed. The Applicant does not believe that extending the project lifecycle beyond 60 years would materially alter conclusions of either assessment. Whilst a

ExQ	Respondent	Question	Applicant's Response
			longer operational life would result in additional operational emissions being generated, these emissions would occur within an increasingly decarbonised economy and would represent a small contribution to relevant carbon budgets. Overall, the assessment concluded that the greenhouse gas impact of the Scheme is beneficial. This is based on the Scheme's contribution to emissions mitigation through the generation of renewable electricity and the avoidance of greenhouse gas emissions that would otherwise occur under the without-project baseline. Extending the Scheme's operational life beyond 60 years would not materially alter this conclusion. It is also noted with respect to the climate resilience assessment that whilst the magnitude of climate variables may change over time, extending the lifecycle period beyond 60 years is unlikely to introduce more categories of risk and materially change conclusions already provided. The Applicant has utilised a 60-year timeframe in ES Volume 1, Chapter 6 - Climate Change [APP-042] for the assessment period because it represents the anticipated operational lifespan of the Scheme. It allows the consideration of maximum operation for modern photovoltaic (PV) technology before decommissioning is required with capacity to accommodate at least one replacement and subsequent repowering. It also

ExQ	Respondent	Question	Applicant's Response
			aligns with the design assumptions provided for the Scheme and used consistently across the environmental assessments.
Q1.5.2	The applicant	Carbon emissions related to pylons Table 6.23 and the related commentary in paragraph 6.9.57 of ES Chapter 6 (Climate Change) [APP-042] reports total emissions associated with pylon removal as 107.6 kilograms of carbon dioxide equivalent (kgCO₂e). Please review this figure, confirm the following and make amendments where necessary: a) Whether the figure in table 6.23 and paragraph 6.9.57 should be tonnes of carbon dioxide equivalent (tCO₂e) rather than kgCO₂e? b) As a result of a), whether the total value reported in table 6.25 and paragraph 6.9.59 is correct? c) Whether the reported figures include carbon emissions associated with the temporary pylon and, if not, why not?	a) Table 6.23 outlines the calculation for multiplying weight in metric unit tonnes by kgCO₂e/tonne to provide kilograms of CO₂ equivalent (kgCO₂e), i.e., the emission factor is expressed in kgCO₂e per tonne of steel removed. Application of that factor results in emissions of 107.6 kgCO₂e (0.1076 tCO₂e). As such the value reported in Table 6.23 and section 6.9.57 is accurate. b) As the value presented in Table 6.23 is correctly reported as kgCO₂e, when converting this to tCO₂e and adding to the value from Table 6.24 reported in tCO₂e, the value reported in Table 6.25 and section 6.9.59 in tCO₂e remains valid and unchanged. c) The Applicant confirms that the values reported in Table 6.23 and Table 6.24 respectively accommodate for emissions associated with the temporary pylon, acknowledging that Table 6.23 accounts for removal of three existing pylons and a temporary pylon and Table 6.24 accommodates for three replacement pylons, one additional pylon and a temporary pylon.

ExQ	Respondent	Question	Applicant's Response
Q1.5.3	The applicant	Sulphur hexafluoride (SF₆) Paragraph 6.9.70 of ES Chapter 6 (Climate Change) [APP-042] states that SF₆ would be used in electrical equipment associated with the substations. Recent decisions for the Peartree Hill Solar Farm Order (2026) and The One Earth Solar Farm Order (2026) secured the commitment from the applicant to avoid the use of SF₆, and the decision for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (2026) commits to further assessment or justification in relation to the use of SF₆-free switchgear. This approach is supported in policy within the NPS for Electricity Networks Infrastructure, 2025 (EN-5) in paragraphs 2.9.60 to 2.9.65, 2.10.14, 2.10.15 and 2.11.17. With reference to these decisions and the policy references, explain whether the applicant can commit to not using SF₆ and if this is not achievable, why not? Where the approach would be altered, would this impact on the design and parameters of the electrical equipment associated with the substations? If so, explain how?	The Applicant confirms it is proactively seeking to minimise the use of SF₆ with focus on electrical equipment for the substations to eliminate SF₆. Where non-SF₆ equipment is technically available, proven, and suitable for the required voltage and power ratings, the Applicant intends to adopt such technologies within the Scheme. However, at the time of writing, non-SF₆ alternatives are not yet fully mature or commercially available across all voltage levels and equipment ratings required for the Scheme. In particular, for certain higher voltage applications at the substation and specific operational requirements, SF₆-based equipment remains the only technically proven and reliable option that meets current performance, safety, and specification standards. Accordingly, the use of SF₆ cannot be entirely avoided at this stage.
Q.1.5.4	The applicant	Greenhouse gas reduction strategy	The Applicant acknowledges this comment and has considered the extent of qualifying phrases in the outline management plans.

ExQ	Respondent	Question	Applicant's Response
		The oCEMP [APP-196], the oOEMP [APP-197] and the outline Decommissioning Environmental Management Plan [APP-198] include measures which form the Green House Gas Reduction Strategy as required EN-1. However, there are several phrases or words used which are considered extremely vague such as 'encouraging', 'where practicable', and 'explore'. Please review these measures and commitments and how they can be updated to ensure definite measures are included to reduce carbon emissions and meet the policies set out in section 5.3 of EN-1.	These outline management plans establish a framework for the details to be secured through the DCO Requirements. The qualifying phrases are considered appropriate by the Applicant at this stage given the outline nature of the management plans, the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice, the specificity will be provided in the detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the Environmental Statement are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer

ExQ	Respondent	Question	Applicant's Response
			required as technology has advanced and the impact will no longer occur). It's the Applicant's opinion that the qualifying phrases of the outline management plan do not reduce the clarity of the measures relied upon within the Environmental Statement nor does flexibility they allow affect the likely residual effects of the Scheme as presented identified in the Environment Statement. As such, the Applicant does not believe that changes to the qualifying phrases are considered necessary and that the outline management plans can be adequately assessed during Examination. See also the Applicant's response to Q1.9.1 which explains how the reduction in flexibility would be counterintuitive as the more stringent obligations would reduce, rather than enhance, the level of detail available to stakeholders at this stage because it would reduce the commitments the Applicant is able to make at this stage

2.6 Community, health and wellbeing

ExQ	Respondent	Question	Applicant's Response
Q1.6.1	The applicant	Human-health: potential exclusion of health pathways The Human Health Summary states at ES paragraph 18.6.22 [APP-054] that it does not anticipate introducing new effects beyond those identified in the technical chapters. Explain how this approach accords with current Institute of Sustainability and Environmental Professionals guidance on the assessment of population and human health and whether any health pathways have been excluded from consideration as a consequence.	The Applicant confirms that no relevant human health pathway has been excluded from consideration as a consequence of the approach described at paragraph 18.6.22 of ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. That paragraph should not be read as suggesting that a health effect can only be recognised where another technical chapter has already expressed its conclusion in health terms. Rather, it explains that the Human Health Summary Statement draws together and provides a population health interpretation of the environmental, social and economic changes assessed across the ES, without duplicating those technical assessments or introducing a separate set of project impacts. This approach accords with the ISEP (2022) guidance on Effective Scoping of Human Health in Environmental Impact Assessment, which requires a proportionate assessment based on plausible source-pathway-receptor linkages across the wider determinants of health framework. The guidance recognises that evidence on environmental and socio-economic effects may be provided by other ES technical chapters, but recommends bringing the likely population health

ExQ	Respondent	Question	Applicant's Response
			effects together in one place. It specifically advises against relying solely on disparate consideration of health across technical chapters, as this does not support efficient review or consistent consideration of population health outcomes and public health implications. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] performs this integrating function. It draws on Scheme-specific findings of the relevant technical assessments that consider likely significant effects and interprets them in population health terms, considering the relevant pathways, population and vulnerable sub-population sensitivity, health inequalities, baseline conditions, scientific evidence, consultation, policy context, mitigation and cumulative effects. The pathways considered include air quality, noise and vibration, water, transport and access, landscape and visual change, climate change, socio-economics, soils and agricultural land, ground conditions and electromagnetic fields. Mental wellbeing and equality-related effects are also considered through the Equality Impact Assessment [APP-214] and appropriately signposted within the Human Health Summary Statement.

ExQ	Respondent	Question	Applicant's Response
			This is also consistent with ISEP (2022) Guide to Determining Significance for Human Health which recognises that information on exposure and the scale, frequency, duration and extent of change will commonly be drawn from other ES chapters. The health assessment must then consider what those changes mean for population health, including relevant sub-populations and health inequalities. It also recognises that a population health conclusion may differ from the significance conclusion reached by the originating technical chapter. Paragraph 18.6.22 confirms that the Statement draws on, but does not duplicate, the wider ES assessments. It does not exclude pathways not already expressed in health terms. All relevant pathways have been considered, with conclusions informed by population sensitivity, mitigation and the wider public health context.
Q1.6.2	The applicant	Human-health: reliance on future mitigation, operational controls and detailed design Identify any conclusions on human health that rely on future management plans, detailed design, operational controls or later-stage mitigation and explain how the applicant has nevertheless concluded that	The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] identifies a number of mitigation measures that will be secured through the DCO and certified documents, including the Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197], Outline LEMP [APP-199], Outline PRoWPPMP[APP-203], Outline SRMP [APP-204], Outline BSMP [APP-

ExQ	Respondent	Question	Applicant's Response
		likely significant effects on population and human health can be excluded.	200], Outline DEMP [APP-198], and the Design Principles, Parameters and Commitments document [APP-213]. These documents establish the environmental controls and mitigation that will be implemented throughout the construction, operation and decommissioning phases of the Scheme. The assessment of human health has been undertaken on a reasonable worst-case basis using the assessed Scheme parameters and embedded mitigation secured through the application. For the majority of health pathways, including air quality, transport and access, water environment, climate change, socio-economics, soils and agricultural land, ground conditions and electromagnetic fields, the assessment concludes that effects would be negligible, minor adverse, neutral or beneficial and not significant. These conclusions are based on mitigation measures that are clearly defined and secured through the DCO framework. Notably, pursuant to the Requirements, the authorised development may not commence until final plans containing these details have been approved by the relevant planning authority. In other words, the securing of these measures within the outline plans gives sufficient legal certainty that the scheme cannot be brought forward without sufficient mitigation in

ExQ	Respondent	Question	Applicant's Response
			place such that the conclusions of the assessment are suitably reliable. The only topic where additional mitigation is identified following the assessment is operational noise. The assessment within ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] identifies that further design development and mitigation may be required, including the specification of low-noise equipment, acoustic enclosures, noise barriers and other operational controls. These measures are secured through the Outline OEMP [APP-197] and the Design Principles, Parameters and Commitments [APP-213], with further operational noise assessment required prior to operation. Following implementation of this mitigation, residual operational noise effects are assessed as minor adverse or negligible and not significant as also outlined in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Accordingly, the conclusions of the Human Health Summary Statement do not rely on unspecified or uncertain mitigation. As described in ES Volume 1, Chapter 2 – EIA Methodology [APP-038] (paragraph 2.10.5), the outline management plans submitted with the Application form part of the assessed Scheme and secure the implementation of mitigation measures through the DCO

ExQ	Respondent	Question	Applicant's Response
			framework. The assessment therefore considers likely significant effects after the application of embedded and committed mitigation. On this basis, there is sufficient certainty regarding the implementation and effectiveness of the mitigation measures relied upon, and the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. Finally, for the avoidance of any doubt, the exclusion of a standalone human health chapter was as a result of the Scoping Opinion (as presented in ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114]). This states: “<i>The Inspectorate agrees that a standalone aspect chapter on human health is not required on the basis that the Proposed Development will be designed to minimise any impact on human health and where there are interactions with human health these will be assessed within the Noise, Climate Change and Transport aspect chapters of the ES. Impacts to human health may extend beyond the Traffic and Access, Climate Change and Noise Chapters and the ES should clearly set out potential impacts to human health from the Proposed Development during construction, operation and decommissioning and cross reference where impacts are assessed within the ES e.g. Landscape and Visual, Air Quality, Water</i>

ExQ	Respondent	Question	Applicant's Response
			<i>Environment etc</i> ". This answer explains how the design of the scheme has been prepared, through the embedded mitigation measures, and then assessed in accordance with the scoping opinion and on a topic-by-topic basis.
Q1.6.3	The applicant	Electromagnetic Fields: scheme-specific assessment The applicant is requested to explain the extent to which the conclusions of ES Chapter 17 [APP-053] rely upon scheme-specific assessment, modelling or design information, as opposed to generic industry data, standard assumptions or published reference values, and identify the principal evidence supporting the conclusion of no likely significant effects. Identify all scheme-specific information used within ES Appendix 17.1 (High Level Electromagnetic Field Assessment) [APP-188] including cable design assumptions, current loads, infrastructure arrangements and receptor locations. Identify any field measurements, modelling or calculations undertaken specifically for the proposed development.	The Applicant has assessed the infrastructure that is specific to the Scheme: 400kV underground cables, 132kV underground cables, 400kV (existing) overhead cables, transformers and substations. The electric and magnetic field strengths associated with this infrastructure can be calculated based on the electrical characteristics of the infrastructure, including voltage, current and conductor configuration, using established electromagnetic principles that are documented and published by National Grid as set out within Section 17.15 of ES Volume 1, Chapter 17 – Electromagnetic Fields [APP-053]. The scheme-specific assessment had considered the distances between the infrastructure and human health receptors, such as residential dwellings and locations of prolonged human occupancy. The closest dwellings to the existing overhead 400kV cable network are located at Gore Lane, measuring a lateral distance of approximately 90m. At this distance, the electric field strength will be 0 kV m⁻¹. The magnetic field

ExQ	Respondent	Question	Applicant's Response
			strength for an overhead 400kV cable measures 82 μT at a distance of 0m from the cable which is already less than the exposure limit of 100 μT. Therefore, the closest dwellings at Gore Lane are expected to theoretically experience a magnetic field strength of 0 μT. There are no electric fields associated with either 400kV and 132kV underground cables. The magnetic field strengths at 1m above ground directly above the centreline measure 95 μT and 9 μT respectively, which is less than the exposure limit of 100 μT. There are dwellings adjacent to the CRC, at an approximate lateral distance of 5m. At this distance the, theoretical magnetic field strength for a 400kV and 132kV underground cable measures 18 μT and 1 μT. The electromagnetic field strengths measures are measured from a 1m height above ground level. This is based on ICNIRP 1998 Guidelines. The assessment recommends a scheme-specific clearance distance of 15m from the overhead cables that should be maintained by the scheme.
Q.1.6.4	The applicant	Fire risk and emergency response: reliance on future assessments, approvals and consultation The application documents and the applicant's responses to RRs, conclusions	The Applicant has prepared a schedule, which is provided within Annex A.

ExQ	Respondent	Question	Applicant's Response
		regarding major accidents and disasters, BESS safety, fire risk, pollution prevention, and emergency response appear to rely on a range of future assessments, approvals, consultation processes and management plans. Provide a schedule identifying: a) each future assessment, modelling exercise, test, survey, consultation activity, approval or management plan relied upon in reaching the applicant's current conclusions b) the purpose of each item c) whether it is required to confirm the acceptability of the proposed development d) the mechanism by which it would be secured e) the consequences if the outcome differs materially from current assumptions f) why the applicant considers the ExA can reach an informed conclusion on likely significant effects before those activities have been completed	

2.7 Compulsory acquisition and temporary possession

ExQ	Respondent	Question	Applicant's Response
Q1.7.1	The applicant	Compulsory acquisition, temporary possession and other land or rights considerations: rights sought The applicant's procedural deadline A responses [PDA-010] state that the rights sought are supported through the Land and Rights Negotiation Tracker [APP-023]. Provide a summary of: a) The total number of affected interests b) The number of voluntary agreements completed c) The number of agreements subject to agreed heads of terms d) The number of interests where negotiations remain ongoing e) The number of interests where agreement has not been reached Explain how the applicant concludes that compulsory acquisition powers remain necessary having regard to the current status of negotiations.	The applicant has provided answers in lettered sequence below: a) The Applicant has identified 69 landowners/affected parties within the Land and Rights Negotiation Tracker [APP-023]. b) The Applicant has completed 14 option agreements. Some agreements relate to more than one landowner/affected party due to the ownership arrangements affecting the relevant plots. c) A further 9 heads of terms have been agreed, with the associated agreements yet to complete. d) There are currently 27 affected parties in respect of which negotiations are ongoing. e) A further 18 interests have not yet been issued for negotiation. These primarily comprise interests where the Applicant is confirming ownership and/or the precise nature of the rights required. This includes, for

ExQ	Respondent	Question	Applicant's Response
			example, land where rights may be required for hedgerow management, access or environmental mitigation. The Applicant's Land and Rights Negotiation Tracker records, where applicable, that the Applicant is confirming the nature of the requirements and rights sought and will seek a voluntary agreement with the freeholder to the extent required. The Applicant continues to seek to secure the required land interests and rights by agreement wherever possible. The status of land referencing and negotiations is kept under review, and the Applicant will continue to engage with affected parties as the precise requirements and relevant interests are confirmed. The Applicant considers that the compulsory acquisition and temporary possession powers sought remain necessary notwithstanding the progress made in securing voluntary agreements. The DCO requires the Applicant to secure the land interests and rights necessary for the construction, operation and maintenance of the Proposed Development. While a significant number of interests have been secured or are progressing towards agreement, not all of the rights required to

ExQ	Respondent	Question	Applicant's Response
			implement the DCO have yet been secured. The compulsory acquisition and temporary possession powers provide the necessary means of securing any outstanding interests where agreement cannot be reached, while negotiations continue with the objective of securing the required interests by agreement wherever possible. Certain plots within the adopted highway are excluded from the above negotiation position, as the DCO includes the necessary street works powers in respect of those plots.

2.8 Cultural heritage

ExQ	Respondent	Question	Applicant's Response
Q1.8.1	The applicant	Revised National Planning Policy Framework August 2026 (NPPF) A new NPPF was published on 17 August 2026. This includes changes to the government's approach on the assessment of effects on designated and non-designated heritage assets. The applicant is requested to set out any implications this may have on its assessments on designated and non-designated heritage assets.	There are no anticipated changes to the assessment of designated or non-designated heritage assets. The terminology has, however, changed for NPPF, although the terminology for NPS has not, under which the concluding assessment of effects will remain as previously. Where the previous NPPF (2024, para 212) and NPS EN-1 and NE-3 refer to impacts on designated heritage assets and that great weight should be given to its conservation, NPPF now refers to this as 'substantial weight'. The previous version of the NPPF (2024) refers to harm being either 'substantial' (para 213) or 'less than substantial' (para 214). This is still extant in the NPSs. The new NPPF (2026) now refers to impacts or effects in Policy HE5 as a) having a positive effect, b) having no effect, c) resulting in harm, the degree of which should be identified, or d) causing total loss of significance of the asset. The impacts have been assessed already as either having 'no effect' or resulting in harm, measured as 'less than substantial harm', with the degree of harm assessed on the sliding scale at the lower end. This now equates in NPPF (2026) terms to 'harm at the lower end of the scale or low harm'. The Applicant has updated the Planning

ExQ	Respondent	Question	Applicant's Response
			Statement [APP-209] and Policy Compliance Document [APP-210] at Deadline 1 to capture the implications of the NPPF 2026.
Q1.8.2	The applicant	Schedule of effects on designated and non-designated heritage assets Numerous representations have been received from interested parties setting out concerns regarding the effects on specific designated and non-designated heritage assets. a) The applicant is requested to prepare and submit a heritage schedule, including a full list of the heritage assets raised in RRs and those already assessed in the application, representation reference and brief summary, the name and location of the asset, a cross reference to where it has been assessed by the applicant and a brief summary of the applicant's position. This should be updated, as necessary, following the receipt of written representations and subsequently throughout the examination. Where an assessment has not been carried out by the applicant but is now considered to be required following any particular interested party representation, this should	See Annex B of this document for the heritage schedule, including a full list of the heritage assets raised in RRs and the Applicant's position by reference to the assessments included in the application.

ExQ	Respondent	Question	Applicant's Response
		also be provided as a separate document to supplement the information already provided with the application.	
Q1.8.3	The applicant	Saxlingham Nethergate war memorial, green and walls For the avoidance of doubt and further to RRs and oral representations at open floor hearings 1 and 2, the applicant is requested to submit a drawing clearly showing the extent of all proposed works (including any potential highway works) in the area of the war memorial, adjoining land and historic walls in Saxlingham Nethergate. The drawing should show and clearly mark all relevant features.	The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle Swept Path Assessment (SPA) work based on the transformer specification and associated abnormal load vehicle configuration for the route through Saxlingham Nethergate. The drawings are provided in pages 58-60 of part three of ES Volume 3, Appendix 11.1 – Transport Assessment [APP-176]. The purpose of these drawings is to provide an understanding of the works Wynns have conducted to date to ensure safe passage for the transportation of the required AILs for the Scheme. The SPA provides a positive result for the negotiation of AIL access in Saxlingham Nethergate, including: • No loadings will be implemented onto these areas as the vehicle tracking will remain within the tarmacked highway. • Wynns have been made aware that residents are understandably concerned that their private properties are requiring adaptation works. However, to confirm, Wynns have tracked the vehicle and there are no

ExQ	Respondent	Question	Applicant's Response
			requirements for any remedial works to private property. • The war memorial within Saxlingham Nethergate is located on the outside of the left-hand bend manoeuvre and the vehicle will not conflict with this, or the surrounding green. The vehicle may oversail the area of tarmac footpath between the highway tarmac and green to a small extent, but no loadings will be placed onto this verge. • The vehicle is anticipated to be within close proximities of street furniture in various locations. The Applicant has therefore included the full highway boundary extent within the Order limits in this area to be able to utilise well precedented powers in respect of alterations to layout of streets (see Article 10). Temporary removal and re-instatement of these is commonplace for movements of this nature and will be carried out in accordance with those DCO powers. • Trimming/pruning of foliage to the side and above of the highway is also anticipated, however this will be managed with the owner's consent where required and conducted by a qualified arborist. • There is no requirement to make any amendments to the roadway, footpaths, pavements, or any third-party land, walls,

ExQ	Respondent	Question	Applicant's Response
			gateways or structures. Should the SPAs have recommended that this may have been required, the route would have been disregarded and an alternative route would need to be sourced. • For clarity, the references to the potential for TTROs in the drawing commentary are in error because the DCO powers would be implemented in lieu of any need for those TTROs which may otherwise ordinarily be sought (representing the 'one-stop shop' approach to DCO consenting). For example, see the traffic regulation measures (Article 16) which can manage vehicle use, and the Power to alter layout, etc., of streets (Article 10) which can manage street furniture.

2.9 The Draft Development Consent Order

ExQ	Respondent	Question	Applicant's Response
Q1.9.1	The applicant	Article 2 (Interpretation) In relation to 'applicable period': a) Explain the reason for the inclusion of the applicable period in this case, noting Requirement 2 (Commencement of the authorised development'). b) Given the urgent need for low carbon generation schemes set out in the applicant's Statement of Need [APP-206], why is it necessary to potentially extend the commencement period for this scheme beyond five years? Has a similar approach been agreed by the Secretary of State for Energy Security and Net Zero in recently made orders?	a) The applicable period serves two distinct but related functions within the Draft DCO [AS-032]: First, limiting the compulsory acquisition powers. Article 22(1) provides that "<i>no notice to treat is to be served under Part 1 of the 1965 Act and no declaration is to be executed under section 4 of the 1981 Act after the end of the applicable period</i>", and article 22(2) further provides that "<i>the authority conferred by article 31 (temporary use of land for constructing the authorised development) must not be used after the end of the applicable period</i>". These provisions impose time limits on the exercise of compulsory acquisition and temporary possession powers. They are required by the standard application of the relevant legislation (the Compulsory Purchase Act 1965 and the Compulsory Purchase (Vesting Declarations) Act 1981 as applied to DCOs by section 125 of the Planning Act 2008). A defined "applicable period" aligned

ExQ	Respondent	Question	Applicant's Response
			with those statutory provisions ensures certainty for landowners and third parties as to the maximum duration during which compulsory powers may be exercised. • Second, providing a commencement deadline for the authorised development. Requirement 2(1) provides that <i>"the authorised development must not be commenced after the expiration of the applicable period."</i> The inclusion of a commencement deadline in Requirement 2 is consistent with the approach adopted across all solar DCOs. The purpose of this provision is: (i) to ensure that the authorised development is brought forward within a reasonable period following the making of the Order to ensure that the consent is exercised to realise the benefits; and (ii) to provide certainty to landowners, host authorities, and other interested parties about the outer boundary of construction activity, given that the environmental assessment underpinning the

ExQ	Respondent	Question	Applicant's Response
			application was carried out as at a particular point in time. As explained in the Explanatory Memorandum [AS-032], this approach ensures that the timescale to commence the Authorised Development and to exercise compulsory acquisition and temporary possession powers is aligned and is required following amendments made by the Levelling-up and Regeneration Act 2023 to the compulsory purchase order regime. The definition of 'applicable period' includes "<i>the period of five years beginning on the day on which this Order comes into force and includes any extension applied by section 4A (extension of time limit during challenge) of the 1965 Act or section 5B (extension of time limit during challenge) of the 1981 Act</i>". In respect of Requirement 2, it is standard drafting for equivalent requirements to require developments to commence no later than the expiration of five years. For example, including the Springwell Solar Farm Order 2026, the Heckington Fen Solar Park Order 2025, the Cottam Solar Project Order 2024, and

ExQ	Respondent	Question	Applicant's Response
			Gate Burton Energy Solar Project Order 2024. b) The concept of an “applicable period” operates to extend the period for compulsory acquisition authorised by a compulsory purchase order in certain, limited circumstances. As that same concept applies to the commencement requirement for the Scheme, this also means that the commencement period may be extended too. The justification for this is to allow for any delays caused by a judicial challenge. The approach taken by the 1965 and 1981 Acts recognises that any attempt to exercise the compulsory acquisition powers whilst the lawfulness of the order authorising the compulsory acquisition remains uncertain and in dispute would itself be unlawful if a judicial review of the order were successful. In practical terms, this means the granted compulsory purchase powers are very unlikely to be used until a judicial review is determined and the compulsory purchase order confirmed by the Courts. Unless the extension provided by the 1965 and 1981 Acts is applied to the powers in the Order, the period to exercise compulsory acquisition powers

ExQ	Respondent	Question	Applicant's Response
			or commence the development would be effectively curtailed to less than the period intended to be granted by the Secretary of State. Notably, the extension mechanism is inherently tied to the definition of 'applicable period' and is therefore limited to "<i>any extension applied by section 4A (extension of time limit during challenge) of the 1965 Act or section 5B (extension of time limit during challenge) of the 1981 Act</i>". The ability for the period of commencement to be extended is therefore inherently limited and only in the event of a statutory process justifying such an extension. There is no ability for the Applicant to unilaterally extend the period of commencement or otherwise agree to an extension. It is a legal mechanism to ensure that the timings of the availability of compulsory acquisition powers and ability to exercise the consent are aligned, which are related in practice as the ability to take temporary possession may be necessary in order to commence parts of the development. Whilst the Applicant is not aware of any made solar DCO precedent adopting this

ExQ	Respondent	Question	Applicant's Response
			approach, in the offshore wind sector, some DCOs have included applicable periods or express mechanisms by which the Secretary of State could agree an extension to the compulsory acquisition period. There is also emerging solar precedent adopting this approach for DCO applications currently in Examination or awaiting determination, for example the Lime Down Solar Park and the Green Hill Solar Farm. As explained in paragraph 4.5.4 of the Explanatory Memorandum, amendments have been made since the making of the Orders used as precedent in order to reflect changes made to wider compulsory purchase legislation by the Levelling-up and Regeneration Act 2023, to use the concept of an “applicable period”.
Q1.9.2	The applicant	Article 2 (Interpretation) In relation to ‘<i>authorised development</i>’: This definition includes ‘the development described in schedule 1 (authorised development) and any other development authorised by this Order...’ It is noted that schedule 1 already contains a wide range of works including a long list	The definition states “<i>the development and associated development described in Schedule 1 (authorised development) and any other development within the meaning of section 32 (meaning of “development”) of the 2008 Act authorised by this Order</i>”. Section 32 of the 2008 Act refers to the definition of development in the Town and Country Planning Act (TCPA) 1990. Section 32(3) of the

ExQ	Respondent	Question	Applicant's Response
		of 'further associated development'. What might 'any other development' include beyond what is already contained in schedule 1? Explain why this apparent duplication is necessary or delete the reference to 'any other development...'	2008 Act lists works which are 'taken to be development' notwithstanding that the works may not be development under the TCPA 1990 and broadly lists various works in respect of the demolition of building, conservation areas and scheduled monuments. The Draft DCO [AS-032] also includes powers within the Articles to undertake various works in addition to the works included within Schedule 1. For example, Article 8 (Street works), Article 8 (Protective works to buildings), and Article 40 (Felling or lopping of trees and removal of hedgerows). These powers may overlap with the scope of development within section 32 of the 2008 Act. In that case, it is important for those works to fall within the scope of the definition authorised development to ensure that such works will be controlled by the Requirements. Article 3 provides 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 within the Order limits.</i>" As such, bringing the works within the scope of "authorised development" ensures that the works are granted consent but also ensures that any appropriate control mechanisms within the Requirements will also apply.

ExQ	Respondent	Question	Applicant's Response
Q1.9.3	The applicant	Article 2 (Interpretation) In relation to "<i>maintain</i>": a) The Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a Development Consent Order (July 2026) provides guidance on the definition of 'maintenance'. The definition used in this case appears to be quite wide ranging including 'reconstruct', 'replace' and 'improve'. Expanding on the explanation contained in the Explanatory memorandum [AS-034], explain how the guidance has been met in this case. b) What controls would be in place regarding the potential replacement of whole works such as the proposed substations (and any buildings and structures) and other elements of the scheme?	a) It is well established precedent that the definition of "maintain" in the form included in the Draft DCO [AS-032] may include "reconstruct", "replace" and "improve". For example, the Government has consistently recognised this in the Longfield Solar Farm Order 2023 and the Mallard Pass Solar Farm Order 2024, The Cottam Solar Project Order 2024 and The West Burton Solar Project Order 2025. However, it should be noted that the Environmental Statements for those projects did not assess the complete replacement of all solar PV panels or the BESS and therefore it was appropriate for those DCOs to limit the definition of maintain. The words within the definition are not intended to provide a control mechanism (and it is noted that drafting best practice is to avoid including operative provisions within definitions). The operative provision is Article 5 and Article 5(3) provides that the Draft DCO [AS-032] does authorise any maintenance activities that are likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement. The Applicant therefore considers that the definition of "maintain" is proportionate and

ExQ	Respondent	Question	Applicant's Response
			consistent with the assessment undertaken in the Environmental Statement. For example, as explained in ES Volume 1, Chapter 4 – The Scheme [APP-040], it is assumed that the operational life of Solar PV Panels is 40 years and that all Solar PV Panels will be replaced once during the operational phase and this will take a maximum period of 24 months. It is therefore necessary for the scope of the definition of “maintain” to include the power to ‘replace’ those panels at the end of their design life. This is separate to the ad-hoc replacement of Solar PV Panels that may occasionally be required due to damage which is already captured within the assessment, hence the definition of ‘maintain’ expressly including the power to “<i>replace (including scheduled replacement)</i>”. This approach aligns with the guidance which provides that “<i>The maintenance activities defined and authorised in the DCO must be consistent with what has been assessed in the Environmental Impact Assessment (EIA) and set out in the Environmental Statement (ES)</i>”. In addition, the guidance requires that the scope of maintenance powers “...<i>should not be so wide or flexible that materially new</i>

ExQ	Respondent	Question	Applicant's Response
			<i>or different effects could arise from those assessed". Article 5(3) complies with the guidance in this respect.</i> b) In addition to the limitation on the scope of maintenance activities found in Article 5(3) of the Draft DCO [AS-032], further controls are set out in the management plans. Section 2.12 of the Outline OEMP [APP-197] sets out a 'replacement programme'. This confirms that "<i>components such as Solar PV Mounting Structures, 132kV Project Substations, 400kV Project Substations, National Grid Substation and BESS Compound buildings are not anticipated to be replaced during the operational phase</i>". As such, any final plan must be substantially in accordance with that provision. This prevents the Applicant from using its maintenance powers for "<i>the construction of what is effectively a wholly new project</i>" and is therefore in accordance with the scope of the guidance. The content of final plans to be submitted for approval must be substantially in accordance with the outline plans. Therefore, maintenance activities must be substantially in accordance with the

ExQ	Respondent	Question	Applicant's Response
			commitments and mitigation measures in the Outline OEMP [APP-197] pursuant to Requirement 14. Further, paragraph 2(3) of the Schedule 15 (Procedure for discharge of requirements) states that the Applicant, when applying to discharge a requirement, must provide the relevant planning authority with a statement confirming whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement and if it will then it must be accompanied by information setting out what those effects are.
Q1.9.4	The applicant	Article 2 (Interpretation) In relation to “<i>permitted preliminary works</i>” and “<i>permitted preliminary works environmental management plan</i>”: a) Explain what works would be carried out under (c) of the permitted preliminary works “above ground site preparation for temporary facilities for the use of contractors” and justify its inclusion within the permitted preliminary works.	<u>Explanation of works</u> a) It is anticipated that above ground site preparation for temporary facilities for the use of the Contractor will be limited to the establishment of temporary facilities for the purposes of Permitted Preliminary Works (PPW) only. For example, they may be similar to the facilities used by contractors for trial trenching and other such surveys during the pre-application stage. In relation to the construction

ExQ	Respondent	Question	Applicant's Response
		b) Explain what works would be carried out in respect of (e) "the diversion and laying of apparatus" and justify its inclusion within the permitted preliminary works. c) Explain which existing buildings and structures are likely to require demolition in relation to (h) "site clearance" and justify its inclusion with the permitted preliminary works. d) Explain what would be included within 'vegetation removal' (h) and how such removal would relate to submissions pursuant to relevant control documents such as the outline Landscape and Ecology Management Plan [APP-199] and the oCEMP [APP-196]. e) The ExA notes that a permitted preliminary works environmental management plan is to be submitted at deadline 1. This should include details of how any environmental effects of permitted preliminary works would be managed and mitigated, noting the guidance in paragraphs 4.3 and 4.4 of the Planning Act 2008: Guidance on preparing an application: Part 3 –	compound areas shown within ES Volume 2, Figure 4.2 - Indicative Temporary Construction Compound Locations [APP-060], with the exception of fencing, these areas will not be established until after PPW are complete. For the avoidance of doubt, aggregate and groundworks associated with compound areas would only undertaken during the main construction phase. b) It is anticipated that any existing apparatus along the route may require the need to be diverted due to clashes along the route subject to an approved electrical design. This could include the diversion and installation of temporary services or their protection to enable construction. c) It is anticipated that site clearance would be undertaken in discrete work areas, over limited periods and limited to the activities required. Clearance will be limited to the areas reasonably required for the relevant activity and will be phased where practicable so that land is not disturbed materially earlier or more extensively than necessary. It is not currently anticipated that any buildings and structures are likely to require

ExQ	Respondent	Question	Applicant's Response
		Contents of a draft Development Consent Order (July 2026).	demolition, however, should the landowners between now and the beginning of construction, construct buildings and or structures within the order limits, the Applicant must be able to remove the structures to enable construction. These could include barns or temporary storage sheds or other such buildings as required by the landowner for their use of the land. d) It is anticipated that site clearance may also relate to the removal, cutting back or management of vegetation required to establish temporary construction compounds and laydown areas, survey and investigation locations, working areas, and associated environmental mitigation. The response elaborates further with respect to control documents and how they relate below. <u>Justification for permitted preliminary works</u> In short, the works identified in the “permitted preliminary works” (PPWs) include pre-commencement activities such as surveys and site investigations which are considered appropriate as the nature of these works (i.e. non-intrusive, above ground works or actions)

ExQ	Respondent	Question	Applicant's Response
			means they are not expected to give rise to environmental effects requiring mitigation. To the extent that mitigation is required, the PPWs will be controlled by the Permitted Preliminary Works Environmental Management Plan (PPWEMP). The Applicant updated Requirement 13 of the Draft DCO [AS-032] as part of its Section 51 response to provide that any PPWs must be carried out in accordance with the PPWEMP. This secures that the PPW will not give rise to any new or materially different environmental effects because, to the extent that any PPWs may give rise to environmental effects requiring mitigation, the PPWEMP incorporates a legal obligation which secures that mitigation. This approach allows the controls to be tailored to the specific type of PPW and its potential for adverse effects. The PPWEMP sets out the methodology to be used for any PPWs, including any restrictions. The Draft DCO [AS-032] was updated in a number of respects to reflect this approach. A new definition of "<i>permitted preliminary works environmental management plan</i>" was inserted into Article 2, cross-referring to certification in Schedule 12. Also, Requirement 13(1) of Schedule 2 was updated so that the PPWs must

ExQ	Respondent	Question	Applicant's Response
			be carried out in accordance with the PPWEMP. Requirement 10 has also been clarified to reflect those temporary fences, walls and enclosures required as a result of PPWs be controlled via the PPW EMP rather than Requirement 10, and are accordingly excluded from Requirement 10(1). The Applicant acknowledges that some earlier DCOs take an alternative approach. For example, the Springwell Solar Farm Order 2026 brings the PPWs back within the scope of the definition of commencement for the purposes of specific Requirements. For example, the Requirement for a Landscape and ecology management plan includes site clearance (including vegetation removal) as part of the definition of commence for the purposes of that requirement. The Applicant's position is that Requirement-by-Requirement PPW drafting of this kind is not necessary and more administratively complex. The revised approach – securing the PPW EMP via updated Requirement 13 – will apply to the carrying out of any PPW and will secure the necessary mitigation for those activities all in one place. In other words, in response to (d), it is not necessary for any provisions of the oLEMP or

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			the oCEMP to apply to vegetation removal because the extent to which that element of the PPWs needs to be controlled, it is controlled by the PPWEMP. The Applicant's approach achieves the same practical result in a simpler and clearer way, without the need to replicate the control by expressly amending the definition of commencement in each individual Requirement. (e) <u>Permitted Preliminary Works Environmental Management Plan</u> The Applicant does not intend to submit a Permitted Preliminary Works Management Plan at Deadline 1 and will instead be doing so at Deadline 2. As such, the Applicant will be able to address the clarifications requested in detail at that time. This is to allow the Applicant time to fully incorporate amendments to this Scheme's management plan following an internal review process as the result of other ongoing examinations within its portfolio.

ExQ	Respondent	Question	Applicant's Response
Q1.9.5	The applicant	Article 12 (Temporary closure, restriction or prohibition of use of streets and public rights of way (PRoW)) a) Explain why a general provision is made for any street, PRoW as well as those listed in schedule 5. Why is such a broad power needed and justified in this case? b) Why does article 12(2) not apply to all pedestrians, rather than only pedestrians going to or from premises abutting a street or public right of way? What is meant by 'reasonable access'? c) To what extent would diversions be possible where a street or PRoW is affected by this article? What provision is being made for diversions?	a) This two-tier structure of a general power (Article 12(1)) and a specific power by reference to a schedule (Article 12(3)) is a standard and well-precedented feature of DCO street-related provisions. This unified regime replaces the general powers found in the Road Traffic Regulation Act 1984, which local authorities typically use to temporarily stop up and divert streets and public rights of way during works. The scale and spatial extent of the Scheme means that the undertaker's works during construction, operation and maintenance and decommissioning may interact with a larger and more diverse network of streets and PRoW than can be exhaustively pre-identified at the time the Order is made. Schedule 5 lists only those streets and PRoW where the impacts of temporary closure, prohibition, restriction, authorisation, diversion or alteration can be identified with reasonable certainty at the time of the DCO application. Construction of a nationally significant solar infrastructure project is an inherently iterative process. Detailed design, micro-siting of works, ground condition surveys and phasing adjustments will inevitably mean that the precise streets and PRoW affected during active construction

ExQ	Respondent	Question	Applicant's Response
			cannot all be foreseen and listed in a schedule at the application stage. Limiting the power solely to the scheduled routes would risk leaving the undertaker unable to respond to legitimate, unforeseen construction requirements. The Article broadly follows the approach in the model provisions (save that it expressly applies to public rights of way) in that it contains provisions of general application and then also in relation to the specific public rights of way. This approach is well precedented. For example, the One Earth Solar Farm Order 2026, the West Burton Solar Project 2025, the East Yorkshire Solar Farm Order 2025, the Gate Burton Energy Park Order 2024 and the Mallard Pass Solar Farm Order 2024. b) This is an absolute obligation, not a discretionary one, and ensures that even where the general power is exercised, the fundamental right of access to adjoining premises on foot is preserved even if vehicular access is temporarily restricted. The provision is not intended to be a general duty to maintain the continuous, uninterrupted use of every affected street or PRoW for every category of user throughout

ExQ	Respondent	Question	Applicant's Response
			the period of construction, operation and maintenance or decommissioning works otherwise this would defeat the purpose of the power which is to enable temporary closure, restriction or prohibition to facilitate the authorised development. Its purpose is narrower and more targeted to prevent premises which abut an affected route from being left entirely without access as a direct and immediate consequence of the exercise of the Article 12 powers. However, the Article 12(2) obligation does not operate in isolation. The broader protection of PRow users – including walkers, cyclists and horse riders using PRow for recreational purposes or as through-routes – will be addressed through the public rights of way and permissive paths management plan. That plan must be approved by the relevant planning authority before any part of the authorised development commences, with consultation with the relevant highway authority before approval is given, and the plan must be implemented as approved. This plan is secured by Requirement 17 (Public rights of way and permissive paths). The management plan will identify the specific measures that will be put in place to manage

ExQ	Respondent	Question	Applicant's Response
			PRoW during construction, including the management of any temporary closures, the provision of signed diversions and alternative routes, and the timing of works to minimise disruption to users. Paragraph 4.3.2 of the Outline PRoWPPMP [APP-203] sets out that where there is a need to temporarily close or divert the PRoW, works may be undertaken outside of standards construction working hours, so far as is practicable to do so, as PRoW user numbers will be low. The PRoW will remain open and managed during the daytime period, wherever practicable. Paragraph 4.3.3 continues that <i>"Where practicable, access on foot will be maintained or diverted throughout the period of the temporary closure. Advisory signage will be in place to notify users. Notifications will be provided as early as practicable"</i>. Section 4.4 of the Outline PRoWPPMP [APP-203] then deals with PRoW Diversions and Closures. For example, paragraph 4.4.6 provides that where diversions are required, the following measures will be implemented: • Details of the diversion will be advertised along the PRoW for the local community to view;

ExQ	Respondent	Question	Applicant's Response
			• The Applicant will only exercise the power to temporarily stop up/divert a PRow in the event that the management measures are not considered sufficient to ensure PRow user safety and/or in the case of an emergency. Where a temporary closure or diversion is required, this will only be put in place for as long as is reasonably necessary; and • Diverted PRow will be returned to its original alignment as soon as practical. Extending the Article 12(2) obligation to all pedestrians using any affected street or PRow would, in practice, significantly constrain the operational utility of the Article 12 powers, including the power to use a closed or restricted street or PRow as a temporary working site under Article 12(6). To confirm, "reasonable access" is not defined in the DCO but is consistent with the terminology used in the Road Traffic Regulation Act 1984. The expression must therefore be given its ordinary and purposive meaning. For example, the alternative access must be safe, usable

ExQ	Respondent	Question	Applicant's Response
			and reasonably convenient. The obligation is appropriately flexible as reasonable access will depend on the circumstances. In any event, Article 12(4) provides that the undertaker must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert any street or public right of way specified Schedule 5 without first consulting the street authority; and any other street or public right of way without the consent of the street authority, and the street authority may attach reasonable conditions to any such consent. This ensures suitable oversight from the street authority to ensure appropriate provisions are in place in exercise of the powers. c) The general power within Article 12(1) confers an express power on the undertaker to “temporarily close, prohibit the use of, restrict the use of, alter or divert any street or public right of way” (our emphasis) during and for the purposes of constructing, maintaining or decommissioning the authorised development, including the power to divert the traffic or a class of traffic from the street or public right of way. Diversions

ExQ	Respondent	Question	Applicant's Response
			are therefore expressly within the scope of the Article 12 power, and may be applied to any affected street or PRow, whether scheduled or not. The exercise of this power will be controlled by the Public Rights of Way and Permissive Paths Management Plan, discussed above.
Q1.9.6	The applicant	Article 13 (Use of private roads) a) Is a definition required for 'private roads'? For example, does it include private driveways and access tracks? b) A plan is requested showing the location of private roads within the Order limits. c) Should article 13 refer to such a plan or alternatively, could private roads be listed in the same way that Article 8 (street works) are listed in schedule 3 of the dDCO?	a) No separate definition of "private roads" is considered necessary. In this context, the term is intended to encompass roads that are not part of the public highway network and which are under private ownership or control. This article has precedent in made solar DCOs including The Beacon Fen Energy Park Order 2026 and The West Burton Solar Project Order 2025. A definition was not required for either of those Orders. b) A plan showing the location of private roads within the Order limits is provided at Annex C. c) It is not considered necessary to list all private roads to which this power applies as it is all private roads within the Order Limits, and all land within the Order Limits is subject to powers of compulsory acquisition and/or temporary possession. Accordingly, all landowners that are potentially affected by this power will be listed in the Book of

ExQ	Respondent	Question	Applicant's Response
			Reference and already be aware of the Scheme and the potential for greater interactions pursuant to these compulsory acquisition and temporary possession powers.
Q1.9.7	The applicant	Article 18 (Removal of human remains) a) Explain why the likelihood of identification of human remains is so significant in this case to justify this article, noting that it has been omitted by the Secretary of State in several recently made orders? How does this case differ from those cases to justify its inclusion? b) Can appropriate provisions be included in the Archaeological Mitigation Strategy [APP-173] and the subsequent written scheme of investigation (R12) as an alternative to this article?	(a) and (b) Irrespective of whether the Applicant is aware of any burial grounds at this stage, there is always a chance of encountering burials from the prehistoric through to early medieval periods, especially across a landscape at this scale. Whilst the inclusion of a similar article under this principle alone has mixed precedent, the key point for the Scheme is that there is an extensive amount of trenching which remains to be undertaken. Whilst additional geophysical surveys are scheduled for completion by the end of November (pending full access agreement on the rest of the survey area), such surveys are unlikely to pick up burials with certainty. Those surveys may highlight areas of activity that we would then targeted with trenching, hence the necessity to include this article to facilitate a legislative process in the event that remains are identified post-consent.
Q1.9.8	The applicant	Article 24 (Compulsory acquisition of rights)	The Applicant's approach to compulsory acquisition is intended to be proportionate, with lesser powers used where possible. Article 24(1)

ExQ	Respondent	Question	Applicant's Response
		This article provides for the acquisition of rights or the imposition of restrictive covenants over the Order land. It applies to the Order land specified in column 1 of schedule 8 (Land in which only new rights etc. may be acquired), but also undefined rights for Order land not listed in schedule 8. a) The recently published Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order (July 2026) says that 'where land is proposed to be subject to the imposition of restrictive covenants, dDCO provisions must identify the land to which they relate and the nature of the restrictive covenant to be imposed. How does the drafting of article 24 reflect this guidance? b) For the general power, what rights etc are sought and for what purpose? c) Is there evidence that persons with an interest in the Order land were aware that undefined new rights are being sought over all the Order land?	is included to enable the imposition of restriction covenants over land shown coloured pink on the Land Plan [APP-006] in addition to the land shown coloured blue (which is facilitated through Article 24(2)). While the pink land is land over which compulsory acquisition of the freehold may be sought, the dDCO also permits the use of a lesser power, namely the imposition of restrictive covenants, where that is sufficient. This provides flexibility where, for example, voluntary agreements are no longer in place and the detailed design of infrastructure such as a substation has been micro-sited. In such circumstances, it may be necessary to acquire land for the substation itself, but not the wider area originally identified, such that the imposition of restrictive covenants is only required for elements such as cabling to connect to the substation. Article 24 does not oblige the Applicant to compulsorily acquire the freehold of land where that is not necessary, and instead allows the imposition of restrictive covenants over any part of the pink land. In all cases, the imposition of restrictive covenants would need to be for the purposes of the authorised development.

ExQ	Respondent	Question	Applicant's Response
			Column (2) of Schedule 8 sets out 'Purposes for which rights over land may be required and restrictive covenants imposed'. This is identified against specific plots for the purposes of the specific power under Article 24(2). However, the nature of such restrictive covenants is indicative of the nature of any restrictive covenants which may be imposed under the broader power within Article 24(1). These include restrictions on activities such as the erection of buildings, alterations to ground levels and the planting of trees, where such activities would interfere with the exercise of the acquired rights or could damage the authorised development. Such restrictions are necessary, for example, following the installation of the cable route, in order to protect the integrity of that infrastructure. While the intention is to allow ongoing agricultural operations to continue, there would be restrictions preventing activities such as constructing buildings over the cable route corridor or planting trees whose roots could damage the cables. The rationale for the imposition of these restrictions is set out in the Statement of Reasons [APP-018], and the restrictions are limited to those activities which would interfere with the exercise of the rights or cause damage to the authorised development. Where the Applicant acquires the freehold of

ExQ	Respondent	Question	Applicant's Response
			land, it would not be necessary to impose restrictive covenants, as the Applicant would be the landowner. The restrictive covenants would instead apply only in circumstances where the Applicant does not acquire the freehold of the land but instead seeks the compulsory acquisition of lesser rights. (b) The Applicant's approach to compulsory acquisition is intended to be proportionate, with lesser powers used where possible. Article 24(1) is included to enable the compulsory acquisition of rights over land shown coloured pink on the Land Plan [APP-006] in addition to the land shown coloured blue (which is facilitated through Article 24(2)). While the pink land is land over which compulsory acquisition of the freehold may be sought, the dDCO also permits the use of a lesser power, namely the compulsory acquisition of rights, where that is sufficient. This provides flexibility where, for example, voluntary agreements are no longer in place and the detailed design of infrastructure such as a substation has been micro-sited. In such circumstances, it may be necessary to acquire land for the substation itself, but not the wider area originally identified, such that only rights are required for elements such as cabling to connect

ExQ	Respondent	Question	Applicant's Response
			to the substation. Article 24 does not oblige the Applicant to compulsorily acquire the freehold of land where that is not necessary, and instead allows the acquisition of rights over any part of the pink land. In all cases, the acquisition of rights would need to be for the purposes of the authorised development. (c) The provisions in Article 24(1) apply only to land shown coloured pink on the Land Plan [APP-006]. Land shown coloured blue is subject only to the compulsory acquisition of rights as identified in Article 24(2) and the rights and restrictions are set out in Schedule 8. This is reflected in the drafting of Article 24(1) which states "<i>Subject to paragraph (2) and article 31 (temporary use of land for constructing the authorised development)...</i>". In spatial terms, the only landowners who could potentially be subject to the acquisition of rights under Article 24(1) are those whose land is already identified as being subject to compulsory acquisition of the freehold. The Applicant has consulted with all affected persons identified as having an interest in land within the Order limits, including the owners and occupiers of land which may be subject to temporary possession powers. Such persons have been identified through the Applicant's

ExQ	Respondent	Question	Applicant's Response
			diligent inquiry process and have been consulted in accordance with the statutory consultation requirements applicable to the application, for example under section 56 of the Planning Act 2008 (Notifying persons of accepted application). They will also be notified under section 134 of the Planning Act 2008 (Notice of authorisation of compulsory acquisition) in the event that such powers are granted of their land. The provision reflects the Applicant's obligation to act proportionately and to acquire only the land and rights that are required for the purposes of the Scheme. Article 24 therefore enables the Applicant, where appropriate, to acquire a lesser right rather than the freehold, but that any such right must be sought for the purposes of the authorised development. The power cannot be exercised to acquire rights for purposes unconnected with the Scheme, as the scope of the power is expressly limited in that way.
Q1.9.9	The applicant	Articles 31 and 32 (Temporary use of land) a) Provide justification for the limited 14 day minimum notice period set out in 31(3) and 28 day period set out in 32(3). Explain how these are justified with reference to the potential implications	a) There are a number of precedents where 14 days' notice is provided or temporary possession, including Boston Alternative Energy Facility Order 2023, the A47 Wansford to Sutton Development Consent Order 2023, the Manston Airport Development Consent Order 2022, the Cleve Hill Solar Park Order 2020, and more

ExQ	Respondent	Question	Applicant's Response
		for landowners (including but not limited to farmland) who may need a longer period of notice in order to reasonably plan for the ongoing use of their land. b) Would it be necessary to give notice of the period for which temporary possession is sought in order to provide more clarity for landowners? c) Article 31(10) sets out that "The undertaker must not compulsorily acquire, acquire new rights over or impose restrictive covenants over, the land referred to in paragraph (1)(a)(i) under this Order". The compulsory acquisition order is also expressly subject to this article. However, explanation is needed for why this has not been expanded to land not listed in schedule 10 that is temporarily possessed under 31(1)(a)(ii)? d) Has there been evidenced consultation with owners of all land not listed in Schedule 10, in order that they are aware that their land could be temporarily possessed? If this has not been carried out, explain how the	recently the Cottam Solar Project Order 2025 and West Burton Solar Project Order 2025. The Applicant notes that the majority of the Order land is agricultural land and there are no residential properties. This is also the minimum amount of notice required and typically the Applicant will give more notice. Compensation is payable for any damage caused (such as the removal of crops). A 14-day notice period is considered to be appropriate for the Scheme. The Applicant considers that 28 days' notice of temporary possession for the purpose of maintaining the Scheme is reasonable, proportionate and widely precedented. This balances the likelihood that the extent of possession for maintenance is likely to be less than is required for construction, but that it is harder for landowners to anticipate when a requirement for temporary possession may be required. Made DCOs support the inclusion of 28 days' notice, including The Medworth Energy from Waste Combined Heat and Power Facility Order 2024; The Hornsea Four Offshore Wind Farm Order 2023; The Longfield Solar Farm Order 2023; The Awel y Môr Offshore Wind Farm Order

ExQ	Respondent	Question	Applicant's Response
		proposed approach is justified for the land not listed in Schedule 10?	2023; the Cottam Solar Project Order 2025 and West Burton Solar Project Order 2025. b) No. The Applicant does not consider it would be necessary or proportionate to require notice to specify the precise period for which temporary possession is sought. Temporary possession provisions in DCOs do not typically require the undertaker to specify the duration of possession in the notice itself. The proposed drafting is therefore consistent with established DCO precedent and provides landowners with the level of certainty ordinarily considered appropriate for temporary possession powers. The purpose of the notice is to inform affected landowners of the land required and the date on which possession is intended to be taken. At the point notice is served, the precise duration for which possession will be required may not be known, as this will depend on construction sequencing, programme requirements and site conditions. In any event, the length of time that the powers of temporary possession can be used is already controlled in the Draft DCO [AS-032]. For example, Article 31(4) sets out that the undertaker must not, without the agreement of the owners of the land, remain

ExQ	Respondent	Question	Applicant's Response
			in possession of any land for longer than a year following final commissioning of the relevant part of the authorised development or, in the case of land that may be permanently acquired, compulsory acquisition procedures have been commenced before the end of that period. c) The restriction in Article 31(10) is applied to the land identified in Article 31(1)(a)(i) because that land is required only for temporary possession purposes and is not intended to be subject to compulsory acquisition powers. Article 31(10) therefore provides an important safeguard by making clear that land temporarily possessed under that limb cannot subsequently be compulsorily acquired, nor can new rights or restrictive covenants be acquired over it. By contrast, the land identified in Article 31(1)(a)(ii) comprises land in respect of which the Order expressly seeks powers of compulsory acquisition, acquisition of rights and/or the imposition of restrictive covenants. Applying the Article 31(10) restriction to that land would therefore be inconsistent with the powers sought elsewhere in the Order and would unnecessarily constrain the delivery of the authorised development.

ExQ	Respondent	Question	Applicant's Response
			The Applicant therefore does not consider it appropriate to extend Article 31(10) to land falling within Article 31(1)(a)(ii), as doing so would negate the purpose of including that land within the compulsory acquisition powers authorised by the Order. d) Yes. The Applicant has consulted with all affected persons identified as having an interest in land within the Order limits, including the owners and occupiers of land which may be subject to temporary possession powers. Such persons have been identified through the Applicant's diligent inquiry process and have been consulted in accordance with the statutory consultation requirements applicable to the application, for example under section 56 of the Planning Act 2008 (Notifying persons of accepted application). They will also be notified under section 134 of the Planning Act 2008 (Notice of authorisation of compulsory acquisition) in the event that such powers are granted of their land.
Q1.9.10	The applicant	Article 37 (Consent to transfer the benefit of the Order) a) In respect of 37(3)(a) would holders of a licence have sufficient covenant	(a) Yes. A holder of a licence under section 6 (licences authorising supply etc.) of the 1989 Act are

ExQ	Respondent	Question	Applicant's Response
		strength to comply with the terms of this agreement? b) In respect of 37(3)(b), notwithstanding the explanation in the Explanatory Memorandum [AS-034], explain why the transfer is necessary or if the holding company would have sufficient covenant strength to meet the obligations. c) In respect of 37(3)(c) explain whether a transferee would have sufficient covenant strength to comply with the decommissioning requirements?	subject to a comprehensive statutory licensing and regulatory regime overseen by Ofgem. Electricity supply licences are generally held by established, regulated market participants that are required to comply with licence conditions, including financial and operational obligations. The Applicant therefore considers that entities holding a section 6 licence would have sufficient covenant strength to comply with the requirements of the DCO. In addition, compliance with the DCO would remain enforceable through the statutory mechanisms applicable to the undertaker and any transferee of DCO powers, irrespective of the identity of the licence holder. This exemption has strong precedent, including in recently made Orders such as The One Earth Solar Farm Order 2026 and The Beacon Fen Energy Park Order 2026. (b) The transfer of the generating station would require any holding company or subsidiary transferee to hold a licence under section 6 of the Electricity Act 1989 and would therefore fall within the exemption under Article 37(3)(a). However, article 37 applies to all of the authorised development, not just to the generating station.

ExQ	Respondent	Question	Applicant's Response
			For example, it may be preferable for the Applicant to transfer the benefit of the powers required for construction of the habitat mitigation areas or permissive path to a subsidiary, meaning such a transfer would fall only within article 37(3)(b) as it is not necessary to hold a generation licence to operate a habitat mitigation area. It's therefore necessary to retain article 35(3)(b) in order for the Applicant to retain flexibility within its company structure as to which entity is entitled to carry out parts of the authorised development. Article 48 provides a robust and independent safeguard in the event that the compulsory acquisition or temporary use powers relating to the habitat mitigation areas are transferred to a holding company or subsidiary. The undertaker may not exercise any compulsory acquisition powers unless it has first put in place either a guarantee, or an alternative form of security, the form and amount of which must be approved by the Secretary of State. The purpose of that security is to ensure that funds are available to meet any compensation liabilities arising from the exercise of those powers. Accordingly, the protection afforded to affected persons does not depend upon the identity of the particular group company that holds the benefit of the DCO at any given time. Where a transfer is made to a

ExQ	Respondent	Question	Applicant's Response
			holding company or subsidiary within the Applicant's corporate group, the same financial backing and security arrangements remain available to support the liabilities associated with the authorised development. As a result, the Secretary of State can be satisfied that any compensation liabilities will continue to be adequately secured notwithstanding a transfer of the benefit of the DCO within the corporate group. (c) Yes. Upon a transfer taking effect in accordance with the provisions of the DCO, the transferee would become subject to, and bound by, the relevant requirements of the DCO (see Article 37(8)(c)), including those relating to decommissioning under Requirement 21 (Decommissioning and restoration). The decommissioning obligations would therefore run with the transferred benefit and would remain enforceable against the transferee in the same manner as they were enforceable against the undertaker.
Q1.9.11	The applicant	Article 39 (Planning permission etc) a) Provide further justification for the inclusion of this article in this case, following the omission of similarly	(a) and (b) The Applicant is aware that fundamentally different approaches appear to being taken by the Secretary of State for Transport and the

ExQ	Respondent	Question	Applicant's Response
		worded articles in recently made orders for solar projects (for example One Earth Solar Farm and Fenwick Solar Farm). b) What is the specific justification for the inclusion of 39(1) which would appear to allow development not authorised by the DCO to be carried out within the Order limits pursuant to a planning permission, rather than the need to apply for a change to the DCO through s153 of the Planning Act 2008. c) Provide details of any particular schemes which had led the applicant to consider that the drafting in 39(3) is necessary.	Secretary of State for Energy Security and Net Zero. It is the position of the Applicant that the approach of the Secretary of State for Transport is to be preferred, noting that the inclusion of <i>Hillside</i> drafting within a DCO is fundamental to limiting the potential for unforeseen adverse effects of the grant of the DCO and construction of the authorised development. The crux of the decision in <i>Hillside</i> is that if a later planning permission is commenced that, if built out in full, would render it impossible to complete an earlier planning permission, that first planning permission is extinguished. Whilst the <i>Hillside</i> case applies to planning permissions, the principle that a permission will be extinguished if later development makes it impossible to build the full development would also apply where the later development is authorised by a development consent order. The purpose of <i>Hillside</i> drafting is therefore to avoid the inadvertent extinction of third-party planning permissions simply because the Scheme, if built out, would make it impossible for part of a planning permission to be built out. The Scheme involves a large amount of land, and the timescales for obtaining development consent are typically longer than for obtaining a planning permission. As such, there is potential

ExQ	Respondent	Question	Applicant's Response
			for new planning permissions to be granted that overlap with the Order Limits. The principles of <i>Hillside</i> have effect to extinguish from the moment the later planning permission is commenced. The DCO is equivalent in nature to an outline planning consent; however, unlike for an outline planning permission, there is no distinction made between the Scheme authorised by the DCO and the Scheme following the detailed design process and discharge of Requirements. As such, the question of whether a planning permission is impossible to build out would need to be considered against the authorised development as consented. The reverse is not true, as the development consent is granted by statutory instrument, which remains in force, authorising the Scheme, unless and until it is revoked. The Scheme could be implemented, even if to do so would require the removal of new development. If the <i>Hillside</i> drafting were removed, commencing the Scheme may extinguish any planning permission where the works authorised by the DCO in the same area could make such planning permission impossible to build out. In turn, this would require the project covered by the planning permission to re-apply for a new planning permission or

ExQ	Respondent	Question	Applicant's Response
			abandon their project. It is clear that this outcome is not desirable and should be avoided. It is noted that the Supreme Court decision is binding. However, as with all Court judgements, it is only interpreting the legislation and its effects. It is entirely open to the Secretary of State, in making the Order, to make alternative legislative provision, including to provide for a distinct approach to considering whether a planning permission may be implemented where it is affected by a DCO. To do so helps address any lack of clarity that may now exist as to how the <i>Hillside</i> principles apply to development authorised under the Planning Act 2008, rather than the Town and Country Planning Act 1990, providing certainty for developers where land is affected by a DCO. For these reasons, and as set out in detail in the Explanatory Memorandum [REP1-009], the Applicant confirms its view is that <i>Hillside</i> drafting should become standard drafting. (c) Figure 2.1 sets out Cumulative Developments [APP-058] and Appendix 2.4 – Cumulative Schemes (Revision 1) [APP-116]. This includes, for example, a solar farm development with ancillary infrastructure, security fencing and

ExQ	Respondent	Question	Applicant's Response
			access which partially overlaps with Sub-Site 1C (ref: 2024/3817).
Q1.9.12	The applicant	Article 40 (Felling or lopping of trees and removal of hedgerows) a) The wording 'near any part of the authorised development' is vague and imprecise. Other recent orders have used terms such as 'within or overhanging the Order limits'. Can the drafting be amended to rectify this? b) Explain what controls and mitigation would be in place in connection with the general power for the removal or works to trees and shrubs, bearing in mind paragraph 4.33 to 4.35 of the Guidance on preparing an application: Part 3 – Contents of a draft development consent order (July 2026)?	(a) The meaning of 'near' is ascertained through the context of the remainder of paragraph (1). In order to have the power to lop a tree or shrub, the Applicant must reasonably believe it necessary to do so because of obstruction or interference with the construction, maintenance or operation of the authorised development, is a danger to persons using the authorised development, or obstructs construction vehicles. The tree must therefore be of such proximity to the Order Limits that it is causing such an interference and would therefore only apply to trees that are effectively adjacent to the Order Limits. The Applicant does not consider the proposed drafting to be necessary and could potentially be insufficient to protect the Scheme. For example, a tree could become damaged such that it is liable to fall towards the authorised development, presenting a danger to persons using the authorised development; however, that tree could, until it falls, remain wholly outside the Order Limits. It is considered appropriate to restrict the ambit of this power by reference to

ExQ	Respondent	Question	Applicant's Response
			the harm that the tree is causing, as opposed to restricting the power geographically. Whilst the Applicant acknowledges there is varying precedent, the wording used is also precedented. For example, in the Cottam Solar Project Order 2025 and West Burton Solar Project Order 2025. (b) The Guidance provides that <i>“The key requirement is to clearly set out the conditions which must be met before the power can be used, and to identify the affected trees and the works permitted to each tree in a Schedule”</i>. Article 40 makes it clear that the power to fell or lop any tree or shrub near any part of the authorised development or cut back its roots only applies if the undertaker <i>“reasonably believes it to be necessary to do so to prevent the tree or shrub from— (a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; (b) constituting a danger to persons using the authorised development; or (c) obstructing or interfering with the passage of construction vehicles to the extent necessary for the purposes of</i>

ExQ	Respondent	Question	Applicant's Response
			<i>constructing the authorised development."</i> These are clear conditions to be met before the power can be used.
Q1.9.13	The applicant	Article 49 (Crown rights) Should the word 'take' be deleted from 49(1)? If not, justify its inclusion.	No. The Crown insist on this wording being included to ensure that the provisions of Article 49 apply if the undertaker "takes" temporary possession of Crown land. This has been accepted by the Secretary of State. For example, see Article 49 of the Tillbridge Solar Order 2025.
9.2 Schedule 1 – Authorised development			
Q1.9.1	The applicant	Work No.3 (On site substations) The drafting for Work No.3A (400 kilovolt (kV) substation) and 3B (132 kV substation) implies that there would be only one substation in each case, whereas up to three are proposed in each case as set out in ES Chapter 4 (The Scheme) [APP-040] . Would it be clearer if the maximum number of substations is set out in the drafting for Work No.3 (noting the drafting in the draft Botley West Solar Farm Order and the made Peartree Hill Solar Farm Order)?	The Applicant considers that the current drafting appropriately reflects the intended scope of the authorised development which enables a substation to be located in each location where Work No.3A and Work No. 3B is shown on the Works Plan. Specifying within the dDCO that each of Work No. 3A and Work No. 3B authorises "up to three" substations could inadvertently imply that up to three substations may be delivered within each Work No. area. That is not the Applicant's intention. Rather, the intention is that each Work No. identifies an area within which a single substation may be located Requirement 5 prevents commencement of Work No. 3 unless details have been submitted to and approved by the relevant planning

ExQ	Respondent	Question	Applicant's Response
			authority, and those details must accord with the DPPC. Table 4.3 of the Design Principles, Parameters and Commitments set out the details of the proposed substations. For the 400kV substations, the parameters identify three potential locations (the BESS Site, Sub-Site 5A and Sub-Site 1B). Similarly, for the 132kV substations, the parameters identify three potential locations (Sub-Site 4B, Sub-Site 7F and Sub-Site 10C). The Applicant therefore considers that the current drafting is appropriate.
Q1.9.2	The applicant	Work No.4 (National Grid substation) a) The drafting for Work No.4A includes 'a new 400kV AIS substation'. Does 'AIS' need to be defined? b) The drafting for Work No.4A goes on to say 'includes typical substation infrastructure in line with good working practice and standards'. This is general and unspecific. Can the wording be updated to be more precise?	(a) The Applicant has included a definition of "AIS" as "Air Insulated Substation" in paragraph 1 of Schedule 1 of the DCO submitted at Deadline 1. (b) The Applicant does not consider amendments to the drafting to be necessary. The reference to "<i>typical substation infrastructure in line with good working practice and standards</i>" is intended to provide flexibility for National Grid at the detailed design of the substation, whilst ensuring that the authorised works are limited

ExQ	Respondent	Question	Applicant's Response
			to infrastructure that would ordinarily be required for the construction, operation and maintenance of a 400kV air insulated substation. Firstly, the scope of that general wording is limited by the control mechanism that any such works must be justified by reference to good working practices and standards. Secondly, the drafting already provides specific examples of the infrastructure that may be included, namely foundations, a control building or container relay rooms with associated offices, storage and welfare facilities, and monitoring and control systems. The use of the term "including" makes clear that this is not intended to be an exhaustive list, recognising that the precise specification and configuration of ancillary substation infrastructure may evolve through the detailed design process. The Applicant considers that the current drafting strikes an appropriate balance between certainty and flexibility and that no amendment is required.
Q1.9.3	The applicant	Work No.5 (Connection to overhead transmission electrical line)	(a) and (b)

ExQ	Respondent	Question	Applicant's Response
		There may be some repetition between the works as set out in Work Nos. 5A, 5C and 5D, particularly in relation to works proposed to the existing overhead transmission electric line. For example, Work No.5A includes 'works to modify' and 'reconfigure', 5C includes 'modification of existing pylons' and 5D includes 'modifying and removal of existing overhead transmission line and pylons'. The drafting may also be able to be made clearer and more precise. a) Please provide further clarification of the works proposed for Work Nos.5A, 5C and 5D, including supporting material to illustrate what is being proposed. b) Could the work descriptors in the dDCO drafting be amended to be clearer and more precise?	The Applicant does not consider any amendments to the drafting of Work Nos. 5A, 5C or 5D to be necessary. For clarity, the work numbers relate to different elements of the overhead line connection works: • Work No. 5A authorises the construction and installation of the new overhead transmission electric line. • Work No. 5C authorises modifications to the existing overhead transmission electric line required to facilitate the connection. • Work No. 5D authorises the dismantling and removal of existing overhead transmission infrastructure, including pylons and foundations. Although similar terminology is used across the work descriptions, each work number serves a distinct purpose and applies to different aspects of the proposed works (see our emphasis above). The location and extent of each work number is separately identified on the Works Plans. The Applicant therefore considers that the current drafting provides a clear and accurate

ExQ	Respondent	Question	Applicant's Response
			description of the authorised works and that no further amendments are required. The Applicant does not consider there to be repetition between Work Nos.5A, 5C and 5D for the following reasons: • Work No.5A stipulates the works as they relate to the construction and installation of the new pylons and overhead lines in order to facilitate the connection to the components in Work No.4A. Modify and reconfigure in this Work package refer to any potential changes in the specification of the cable or pylons detailed in 4.3.7 The Scheme [APP-040]. This allows National Grid flexibility during their detailed design stage as the final configuration is at their discretion. • Work No.5C details works specific to the modification of the existing overhead lines necessary to facilitate the connection to the components in Work No.4. This includes the temporary pylon necessary to maintain the connection whilst the wider works within Work No.5 are completed. It also details the realignment of the gantries, pylon and overhead line

ExQ	Respondent	Question	Applicant's Response
			cable necessary to reroute the cable into the National Grid substation. The necessary equipment needed to facilitate this connection is detailed in Work No.5A(iv). • Work No.5D details the works required to dismantle and remove pylons to enable the realignment of the 3 existing pylons and the new pylon. As such Work No.5A is concerned with the construction of the new pylons and overhead line cable. Work No.5C, the realignment, modification and temporary diversion of the existing overhead line, necessary to deliver the connection in relation to Work No.4. Work No.5D the dismantling and removal of the existing overhead line to enable Work No.5A and 5C to be completed. The Applicant considers the wording to accurately reflect the works required to deliver the connection to equipment detailed in Work No.4. The Applicant has also submitted an illustrative layout of the realignment of the pylons and overhead line cable at Deadline 1 to provide further clarity of the works (ES Volume 3,

ExQ	Respondent	Question	Applicant's Response
			Appendix 4.1 – Illustrative Technical Information [EN0110014/EXAM/6.3.4.1]). Paragraphs 4.3.1-4.3.8 in The Scheme [APP-040] go into further detail on the works in Work No.5 including the proposed method of connection into the National Grid substation and the realigned and temporary pylons.
Q1.9.4	The applicant	Approval of details and control of proposed works R5 of the dDCO [AS-032] provides for the detailed design approval of Work Nos.1, 2 and 3. It is noted that this will be updated at deadline 1, including provision for the detailed approval of Work No.4 (National Grid substation). For those works not covered by the approval of details requirement, explain how each work would be either the subject of further approval and/ or be covered by relevant control documents/ management plans. For any proposed work that would not be the subject of either further detailed approval or a relevant control document/ management plan, provide justification for this.	See the updated Draft DCO [AS-032] submitted at Deadline 1 which prevents commencement of Work No. 4 (in addition to Work Nos. 1, 2 and 3) until details relating to that part have been submitted to and approved by the relevant planning authority. The Requirement has also been updated to provide that “<i>Works Nos. 5 and 6 must be carried out in accordance with the design principles, parameters and commitments</i>”. For the remaining Work Nos. 7-11, these works are suitably controlled by a combination of the mitigation measures secured across all of the other Requirements within Schedule 2. For example: • Work No. 7 (general): This will depend on the specific works power being exercised but includes: sub-paragraph (a) (fencing, gates,

ExQ	Respondent	Question	Applicant's Response
			boundary treatment and other means of enclosure) will be controlled by Requirement 10 (Fencing and other means of enclosure); sub-paragraph (c) (landscaping and biodiversity mitigation and enhancement measures including planting) will be controlled by Requirement 7 (Landscape and ecology management plan); and sub-paragraph (f) (temporary public right of way diversions, signage and information boards) will be controlled by Requirement 17 (Public rights of way and permissive paths). • Work No. 8 (laydown areas): Requirement 15 (Outline Construction Traffic Management Plan) • Work No. 9 (site access): Requirement 15 (Outline Construction Traffic Management Plan) • Work No. 10 (habitat management areas): Requirement 7 (Landscape and ecology management plan) • Work No. 11 (creation of permissive paths): Requirement 17 (Public rights of way and permissive paths).
Schedule 2 - Requirements			

ExQ	Respondent	Question	Applicant's Response
Q1.9.1	The applicant	General drafting of requirements Several requirements (including R6, R7, R8, R9, R10, R12, R13, R14, R15, R16, R17, R18, R19 and R21) include drafting to the effect that further submissions 'must be substantially in accordance with' the relevant outline plan or, in the case of R4, the relevant design principles, parameters and commitments. The use of this wording may create uncertainty for parties in what should be submitted and it is not clear how it would meet the test of precision. Furthermore, given that the relevant plans are outline in any case and the design parameters are maxima it is not clear how this wording can be justified. The ExA suggests that this phrase is amended to 'must be in accordance with'. If not, robust justification would need to be provided.	The wording "substantially in accordance with" is a necessary and proportionate mechanism for inclusion within the draft DCO to provide essential flexibility between the outline stage and detailed design. For example, it is not the intention that the Applicant is bound rigidly to all exact timings and durations of works set out in the outline plans because there is a need for flexibility to allow for the design evolution. This is suitably controlled as final details are subject to the approval of the relevant planning authority where appropriate. The wording retains an intentional and inherent element of subjectivity, whilst ensuring that the outline plans are secured as being sufficiently representative of how the final plans will look. If the wording was too precisely defined, this would make the process less flexible. The practical effect would be counterproductive because the outline plans would need to be drafted at a much higher and less informative level to avoid unintentional non-compliance. This would reduce, rather than enhance, certainty for stakeholders during examination. It would undermine the ability to respond positively to new information or improved mitigation techniques at detailed design stage.

ExQ	Respondent	Question	Applicant's Response
			The DCO also ensures that any variation from the approved details must not give rise to materially new or materially different adverse environmental effects from those assessed in the ES. Requirement 3(2) secures that <i>"The relevant planning authority must not approve any amendments under sub-paragraph (1) to any approved document unless it has been demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement"</i>. This is applicable to the approved details of 'any requirement', as confirmed by the language in Requirement 3(1). To confirm, Requirement 5 deals with detailed design approval (not Requirement 4 as the question suggests). To reassure the ExA, Requirement 5 already sets out that the details submitted pursuant to that Requirement <i>"must accord with the design principles, parameters and commitments"</i>. The obligation to 'accord' rather than be 'substantially in accordance with' is a more stringent obligation. This is in recognition of the concern raised by the ExA. Namely, it is reasonable to expect that the final details must accord with an objective list of

ExQ	Respondent	Question	Applicant's Response
			maximum design parameters. However, as explained above, flexibility must be retained for other Requirements. This wording is well established and accepted by the Secretary of State across solar DCO precedent.

2.10 Ecology and biodiversity

ExQ	Respondent	Question	Applicant's Response
Q1.10.2	The applicant (a, b, c) and SNDC (a)	Great crested newt surveys In light of SNDC's concerns [RR-1795] regarding further great crested newt survey work at additional water bodies created as part of the Long Stratton Bypass landscaping scheme, and the applicant's response [PDA-008] that access to these ponds has previously been requested but not provided, can the applicant and SNDC discuss this matter and provide an update at deadline 1 confirming: a) Whether access has been agreed. b) Whether any further survey or assessment work has been or will be undertaken and when this would be. c) How and when the outcome of any further survey/ assessment work would be submitted.	This matter has been discussed with SNDC, and update provided within the associated Statement of Common Ground [EN0110014/EXAM/9.5]. Access was requested of NCC to survey these ponds in June 2026, with no permission being provided. However, visual surveys from directly adjacent publicly accessible highways found all ponds to consist of shallow drainage features associated with the Long Stratton bypass (understood to have been recently created in 2025), with a terrestrial grassland sward; likely to be wet only on a temporary basis after rain and therefore, currently unsuitable to sustain breeding great crested newt populations. Additional great crested newt surveys have been undertaken during 2026 on ponds that were previously inaccessible / unsurveyed or inconclusive ponds, thereby providing a strong spatial coverage of the Order Limits and surrounding environment. The results of which has been provided within an updated Great Crested Newt Survey Report to be submitted at Deadline 1 [EN0110014/EXAM/6.3.8.3]. The results of the updated surveys, do not result in a change of likely significant effects, and the assessment provided within ES Volume 1, Chapter 8 –

ExQ	Respondent	Question	Applicant's Response
			Ecology and Biodiversity [APP-044] remains robust and accurate.
Q1.10.5	The applicant	Local Nature Recovery Strategy SNDC's RR [RR-1795] and Natural England's RR [RR-1410] raised matters in relation to measures being delivered through the Norfolk Local Nature Recovery Strategy (LNRS). In the absence of an update to section 8.9 of ES Chapter 8 (Ecology and Biodiversity) [APP-044], can the applicant clearly set out the measures proposed to enhance biodiversity and ecological connectivity and explain how these measures would contribute to the LNRS.	Whilst the Scheme's design evolution was understandably progressed prior to the publication of the LNRS² on 31st October 2025, 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. Where possible, areas of land located within the Order Limits identified as having potential to become of particular importance to biodiversity if suitable nature recovery actions are carried out, known as 'areas that could become of particular importance' (ACB) within the LNRS Local Habitat Map³ have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Appendix A Areas of ACB that have been prescribed their suggested habitats within the Green Infrastructure Strategy [AS-005] are identified within the Biodiversity Net Gain Statutory Metric [APP-219] on the A-2 On-Site Habitat Creation tab under the strategic

² Norfolk County Council. (2025). Norfolk Local Nature Recovery Strategy, published 31 October 2025, available at: <https://www.norfolk.gov.uk/article/73317/Norfolks-Local-Nature-Recovery-Strategy>

³ Norfolk Local Habitat Map available from: <https://experience.arcgis.com/experience/3425559ce5b94929b6865d0ba7e34f50/page/Map?views=Information>

ExQ	Respondent	Question	Applicant's Response
			significance. These LNRS ACB habitats are set to high strategic significance: 'formally identified in local strategy' within the metric. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity.
Q1.10.6	The applicant	Biodiversity Net Gain metric and condition assessment SNDC has requested a Biodiversity Net Gain (BNG) metric spreadsheet and condition assessments [RR-1795], please can these be provided at deadline 1.	This matter has been discussed with SNDC, and an update provided within the associated Statement of Common Ground [EN0110014/EXAM/9.5]. All requested documents have been provided prior to Deadline 1.
Q1.10.7	The applicant	Biodiversity Net Gain R9 of the dDCO [AS-032] secures a minimum of 10% BNG across all units, whereas the BNG Report [APP-218] demonstrates 37.42% gain for habitat units, 31.35% gain for hedgerow units and 16.08% for watercourse units. Which of the figures are relied on in the assessment of beneficial effects in chapter 8 [APP-044] and the weight given in the planning balance within the Planning Statement [APP-209]?	Paragraph 8.2.63 of the Planning Statement [APP-209] takes account of the individual BNG scores for habitat units, hedgerow units and watercourse units as set out in the Biodiversity Net Gain Report [APP-218] in the planning balance and the Applicant considers BNG should be afforded moderate positive weight. However, it should be noted that the overall planning balance does not solely rely upon BNG and takes account of the positive (such as the provision of low carbon electricity, ecological and landscape benefits, permissive paths, employment generation, and skills training), neutral and negative impacts of the Scheme.

ExQ	Respondent	Question	Applicant's Response
			The assessment of beneficial effects provided within Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] considers the habitat provision / enhancement / retention measures provided within the Green Infrastructure Strategy when considering the benefits to biodiversity and green infrastructure connectivity. The Biodiversity Net Gain Report [APP-218] illustrates that in practice, based on the Green Infrastructure Strategy [AS-005] (as secured within the Outline LEMP [APP-199]), the Scheme will deliver BNG in excess of 10% BNG. The highest % BNG the Applicant is willing to commit to for each unit type is the following: +30% Habitat Units +25% Hedgerow Units +10% Watercourse Units These figures are lower than the figures the Scheme is anticipated to deliver as reported in the Biodiversity Net Gain Assessment Report [APP-218]. However, this is in order to retain design flexibility and account for any adjustments as a result of detailed design changes, and also to account for any potential future changes to either

ExQ	Respondent	Question	Applicant's Response
			the published Statutory Metric or the application of BNG which may affect the figures at the detailed design stage.
Q1.10.8	The applicant	Retained Agricultural Land Retained agricultural land is detailed in the Indicative Masterplan [APP-059] and further referred to in the outline Landscape and Ecology Management Plan [APP-199]. What is the purpose of the agricultural land which is not being used for mitigation purposes (i.e. Skylark mitigation) and why is it necessary to include this land within the Order limits?	The retained agricultural land which is not proposed for skylark mitigation includes the provision of areas of arable field margin as shown within the Green Infrastructure Strategy [AS-005], these areas also form part of the applicants Biodiversity Net Gain delivery. Arable field margins and Skylark mitigation (in the form of skylark plots) are required to be delivered within an arable farming landscape, hence the retention of active farmland in these areas.

2.11 Landscape and visual

ExQ	Respondent	Question	Applicant's Response
Q1.11.1	The applicant	Residential visual amenity Paragraph 2.1.11 of the Residential Visual Amenity Assessment (RVAA) [APP-148] explains that it is unlikely that the proposed development would result in an 'overbearing' or 'overwhelming' visual effect beyond 500m from the maximum development parameters. However, despite the 500m and 250m study area and offsets, table 1 of the RVAA [APP-148] only assesses properties within the 100m study area. Explain in further detail why only properties within the 100m study area were assessed with RVAA methodology. In particular, explain the rationale for this where residential properties are located in proximity of larger and taller elements of the proposed development such as the proposed National Grid substation (Work No.4), 400kV substations (Work No.3) and BESS (Work No.2).	The Applicant considers that the assessment of residential properties within 100m of the maximum development parameters represents a proportionate application of the Residential Visual Amenity Assessment (RVAA) [APP-148] methodology and is consistent with similar approved DCOs such as the Mallard Pass Solar Farm (EN010127). The 500m and 250m offsets were identified at the outset of the assessment as precautionary search areas, based on professional judgement. An initial desk-based review was undertaken for residential properties within 500m of the Proposed Development, using Zone of Theoretical Visibility (ZTV), aerial photography, mapping and professional judgement. Following this review, properties within 100m of the maximum development parameters were identified as those with the greatest potential to experience visual effects of a nature or magnitude capable of engaging the Residential Visual Amenity Threshold. Mallard Pass Solar Farm DCO had also used a 100m study area for its RVAA. The RVAA identified and assessed all residential properties within 100m of the maximum

ExQ	Respondent	Question	Applicant's Response
			development parameters, comprising 20 properties. Of these, only two properties progressed to Step 4 detailed assessment, and neither was found to meet the Residential Visual Amenity Threshold. Consequently, the assessment demonstrates that even within the area of greatest potential effect, the Scheme would not result in overbearing, dominating or overwhelming effects on residential visual amenity. It therefore follows that properties located beyond 100m would be even less likely to experience effects capable of meeting the Residential Visual Amenity Threshold, therefore the properties within the 250m buffer and 500m buffers are not revisited. For the National Grid Substation (Work No. 4) and 400kV Substation (Work No.3) elements, the assessment assumes the maximum development footprints, representing a precautionary worst-case scenario. In practice, the final substation layouts would occupy only part of the parameter area and therefore the actual separation distance between residential properties and the built substation infrastructure would generally be greater than the distances assessed within the RVAA. The assessment is therefore inherently conservative.

ExQ	Respondent	Question	Applicant's Response
			Regarding the BESS, although it might appear to be a denser development, the maximum height of the BESS is the same as the solar, therefore it is not more likely to be visible from a distance. The Applicant considers it proportionate to maintain a 100m study area for RVAA around the BESS. The ES Volume 1, Chapter 7 - Landscape & Visual [APP-043] assessed views towards the National Grid Substation and 400kV Substation from View Location VL3/Site 1, located on the south-eastern edge of Great Moulton. Whilst significant visual effects are identified at various stages of the assessment, the substations would be viewed in the context of the existing overhead line network and pylons. Existing vegetation already provides a degree of filtering, with further mitigation proposed through additional planting. On this basis, the Applicant considers it unlikely that the National Grid Substation or 400kV Substations would give rise to an "overbearing" effect, as defined within the RVAA, whereby elements of the Scheme are considered disproportionate to their landscape context.
Q1.11.2	The applicant	Residential visual amenity Sheet 8 of the Residential Receptors Plan [APP-084] shows property BESS 1-1 (Frith Farm) to be within the 100m offset study	This issue is noted and the RVAA is revised to include Frith Farm's assessment and has been submitted at Deadline 1 [EN0110014/APP/6.3.7.8].

ExQ	Respondent	Question	Applicant's Response
		area. However, this property does not appear to have been included within the assessments contained within table 1 of the RVAA [APP-148]. The applicant is requested to provide the assessment for this property in an updated RVAA.	
Q1.11.3	The applicant	Residential visual amenity Paragraph 2.1.17 of the RVAA [APP-148] explains that in identifying properties for further assessment, the focus is placed on year 15 of the operational phase when landscaping mitigation is fully established, noting that this represents the stage at which the property and its occupants are expected to experience the effects of the scheme for the longest period during its lifetime. Notwithstanding this, as there could be properties that might be subject to significant visual effects from year 1 to year 15 and noting that this could represent a considerable period of time for the occupiers, the applicant is requested to also identify and assess any residential properties that may be subject to a significant visual effect from years 1 to 15 of operation.	Whilst the focus of Step 3 of the RVAA is on Year 15 of the operational phase, when the proposed mitigation planting is fully established. The purpose of Step 3 is to identify those properties requiring further assessment in Step 4 in relation to the Residential Visual Amenity Threshold judgement. The Applicant has reviewed the outcome of the Step 3 assessment and has reached the same conclusion. Properties that were not taken forward to Step 4 benefit from existing screening provided by landform, vegetation, buildings, or a combination of these features, which limit views towards the Scheme. Therefore, these properties were not considered likely to require detailed assessment or to experience effects capable of meeting the Residential Visual Amenity Threshold. Year 1 and Year 15 effects were both considered for the two properties identified as requiring detailed assessment at Step 4. Whilst significant

ExQ	Respondent	Question	Applicant's Response
			visual effects were identified at Year 1 for some residents, neither property was found to meet the Residential Visual Amenity Threshold. For 22 Hillcrest Court, significant visual effects were identified for upper-floor residents at Year 1; however, the Scheme would occupy only part of the wider view, would be experienced in the context of the A140 corridor, and would not exert a dominating influence or result in a total change in visual amenity. Following establishment of mitigation planting, effects would reduce further. The RVAA therefore concluded that the property would not experience an overwhelming, dominating or overbearing effect. Similarly, for Oakdene Cottage, significant visual effects were identified for some upper-floor views at Year 1; however, the principal rooms and private garden areas are substantially screened by existing vegetation and proposed mitigation. The RVAA concluded that the Scheme would not have an overwhelming or dominating effect on residential visual amenity and therefore would not meet the Residential Visual Amenity Threshold. The Applicant therefore considers that the detailed assessment undertaken at Step 4 already addresses the potential for significant visual effects during the period between Year 1 and Year 15. The findings demonstrate that, whilst

ExQ	Respondent	Question	Applicant's Response
			significant visual effects may occur at certain properties during the early years of operation, these effects would not be of such a nature or magnitude as to render the properties unpleasant or unattractive places to live, nor would they result in overbearing, dominating or overwhelming effects on residential visual amenity.
Q1.11.4	The applicant	PRoW visual amenity The PRoW Visual Amenity Assessment [APP-149] sets out the applicant's assessment of the impacts on users of footpaths and bridleways etc within the Order limits. ES Chapter 7 (Landscape and Visual) [APP-043] includes assessment of the visual effects on view locations including those on PRoW. Notwithstanding the applicant's compartmentalised assessments referred to above, there is little in the way of a cumulative assessment of the effects on recreational users of PRoW who would be likely to traverse more than one named PRoW on any particular journey. For example, residents of Great Moulton or Saxlingham Nethergate/ Saxlingham Green (and other villages and settlements) may partake on circular routes to and from these villages involving a number of different	The Applicant will prepare an assessment to assess the potential effect on users of PRoW who would traverse more than one PRoW in a journey (sequential route assessment) and will submit this at Deadline 2.

ExQ	Respondent	Question	Applicant's Response
		footpaths. Consequently, building on assessment work already carried out, the applicant is requested to provide an assessment of the likely cumulative/ sequential visual effects on footpath users across the Order limits, taking account of the combined effects on users of commonly used footpath routes near to existing settlements.	
Q1.11.5	The applicant	PRoW visual amenity Great Moulton footpaths 13 (FP13) and FP15 at site 1 as identified within the PRoW Visual Amenity Assessment [APP-149] are not marked on the PRoW Receptors Plan – figure 7.10 of the ES [APP-085]. The applicant is requested to update figure 7.10 to show the location of Great Moulton FP13 and FP15 and also to check the entire document to ensure that all other PRoW are correctly marked.	The PRoW Receptors Plan will be reviewed to ensure all the other PRoW are correctly marked and will be revised with the location of Great Moulton FP13 and 15. The updated figure will be updated and submitted at Deadline 2.
Q1.11.6	The applicant, SNDC and NCC	Proposed substations SNDC has raised concerns [RR-1795] regarding the landscaping of the three proposed 400kV substations. a) The applicant is requested to provide further explanation for its proposed landscaping strategy in proximity of all the	a) The landscaping strategy for the proposed National Grid Substation, 400kV substations and 132kV substations has been developed as part of the Scheme-wide Green Infrastructure Strategy [AS-005] and is secured through the Outline LEMP [APP-199] and Requirement 7 of the Draft DCO [AS-032]. Further construction and decommissioning mitigation measures are

ExQ	Respondent	Question	Applicant's Response
		proposed substations (including National Grid, 400kV and 132kV substations), including how the proposals would effectively reduce and mitigate potential landscape and visual effects. b) The applicant is requested to engage with SNDC and NCC with the aim of ensuring that the proposed landscaping near to the proposed substations and other infrastructure is optimised taking account of potential landscape, visual and heritage effects. An update on this engagement is requested at deadline 1. This should also include ensuring the adequacy of measures contained in the relevant outline management plans.	secured through the Outline CEMP [APP-196] and Outline DEMP [APP-198]. The strategy has been designed to: • Retain and reinforce existing hedgerows, tree belts and woodland where possible; • Provide new native hedgerow planting, hedgerow enhancement, woodland planting and linear tree belts; • Strengthen existing landscape structure and field boundaries; • Support habitat connectivity, biodiversity enhancement and species-rich grassland creation; and • Filter and integrate views of above-ground infrastructure within the existing landscape framework. The substation parameter areas represent a worst-case assessment envelope. The final substations will occupy a smaller footprint than the maximum parameter area and detailed design will provide opportunities for refinement of layout and additional landscaping within the approved parameters where appropriate. In addition, the 400kV substations at the BESS Site and Site 5 have been located away from settlement edges and towards the centre of larger development

ExQ	Respondent	Question	Applicant's Response
			parcels where practicable, reducing potential visibility from nearby receptors. The effectiveness of the mitigation has been assessed through the LVIA presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. The assessment demonstrates that, as planting establishes, landscape and visual effects reduce over time, with a number of landscape receptors and representative viewpoints experiencing reductions in effect between Year 1 and Year 15. The mitigation therefore performs an important role in integrating the substations into their landscape setting whilst also delivering wider biodiversity and green infrastructure benefits. The proposed mitigation seeks to reduce landscape and visual effects through: • Retention and reinforcement of existing hedgerows and tree belts; • Hedgerow infill planting, enhancement and long-term management; • New native woodland blocks and linear tree belts where appropriate; • Scrub and species-rich grassland establishment;

ExQ	Respondent	Question	Applicant's Response
			• Reinforcement of existing landscape structure and field boundaries; • Habitat creation and ecological connectivity measures which provide both ecological and landscape benefits. The landscape strategy has been tailored to the characteristics of the Site and aims to response positively to the Landscape Character. Within the E2 Great Moulton Plateau Farmland LCA, mitigation reinforces existing woodland belts, hedgerow structure and landscape framework. This assists with integrating development into the wider plateau landscape whilst supporting habitat connectivity and biodiversity enhancement through species-rich grassland and associated measures. The mitigation also assists with visual screening, including along routes such as Hundred Lane. While a change in character would occur, this remains localised to part of the landscape character area. Within the B1 Tas Tributary Farmland LCA, woodland belt reinforcement, habitat connectivity measures and species-rich grassland contribute both to mitigation and to broader landscape enhancement objectives. These measures respond positively to existing landscape

ExQ	Respondent	Question	Applicant's Response
			characteristics and strengthen the landscape framework. Within the C2 LCA, internal hedgerow reinforcement, woodland planting and scrub establishment help integrate development into its setting over time while supporting biodiversity gains and strengthening existing landscape structure. Effectiveness of mitigation The LVIA demonstrates that the proposed landscape mitigation becomes increasingly effective over time as planting establishes and matures. Assessment of effects at Year 15 shows reductions in both landscape and visual effects compared with Year 1 following construction. Landscape Effects reduction on Site Landscape Character between Year 1 and Year 15: • BESS Site / CRC 1 / CRC 2: Major adverse reducing to Moderate adverse. • Site 4: Moderate adverse reducing to Minor adverse. • Site 5: Moderate adverse reducing to Minor adverse.

ExQ	Respondent	Question	Applicant's Response
			- Site 10: Moderate adverse reducing to Minor adverse. Visual Effects reduction between Year 1 and Year 15 (Substation related view location only): - BESS- VL1: Major to Minor, VL2: Moderate to Negligible, VL3: Moderate to Negligible, VL4: Moderate to Minor, VL5: Moderate to Minor, VL8: Moderate to Negligible, VL9: Major to Moderate - Site 1- VL2: Major to Moderate, VL3: Major to Moderate, VL4 Moderate to Minor - Site 4 -VL6: Moderate to Minor, VL7: Major to Moderate - Site 5 - VL2: Major to Minor, VL6 Moderate to Minor - Site 7 - VL9: Moderate to Minor, VL17: Major to Moderate - VL9 CRC 4: Major to Moderate b) The Applicant is engaging with the SNDC and NCC with the aim of ensuring that the proposed landscaping near to the proposed substations and other infrastructure is optimised taking account of potential landscape, visual and heritage effects. This is reflected in Statement of Common

ExQ	Respondent	Question	Applicant's Response
			Ground with NCC [EN0110014/EXAM/9.4] and Statement of Common Ground with SNDC [EN0110014/EXAM/9.5]. SNDC confirms that the Scheme has been developed with a commitment to embedded mitigation through design. However, further discussion is required regarding the 400kV Substation and the potential effects of the proposed tree belts and woodland planting on the area's open landscape character.
Q1.11.7	The applicant, NCC and SNDC	Advanced planting The applicant's response [PDA-008] to NCC's RR [RR-1451], seeking further clarification on the advance planting and phasing of landscape mitigation, states that it will explore proposals for advanced planting and review opportunities for additional commitments. The applicant, NCC and SNDC are requested to continue discussions on this and provide an update at deadline 1, including locations and components of the development where advanced planting would be beneficial in reducing and mitigating landscape and visual effects and how proposals for advanced planting would be secured through the DCO.	This issue is noted and was discussed with NCC and SNDC on 28/09/2026 as a part of the ongoing conversations to confirm a Statement of Common Ground.

2.12 Noise and vibration

ExQ	Respondent	Question	Applicant's Response	Author ID
Q1.12.1	The applicant	Questions on this topic will follow within ExQ2	The Applicant notes that further questions on noise and vibration are forthcoming.	PLA-3-R

2.13 Soils and agricultural land

ExQ	Respondent	Question	Applicant's Response
Q1.13.1	The applicant and Natural England	Reliance on future surveys, procedures and methodologies, to be developed post-consent The outline Soil Resource and Management Plan [APP-204] identifies that a number of matters, including cable route corridor surveys, soil characterisation, stockpile arrangements, monitoring procedures and restoration methodologies, would be developed post-consent. Comment on whether the outline Soil Resource and Management Plan [APP-204] provides sufficient certainty regarding mitigation effectiveness and restoration outcomes and identify any additional matters which would need to be defined or secured before the Secretary of State for Energy Security and Net Zero could conclude on likely significant effects.	It is anticipated that for the cable route corridor, there will be limited impact from the works on agricultural land and soils as 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 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: 1. 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;

ExQ	Respondent	Question	Applicant's Response
			2. 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. The Outline SRMP [APP-204] sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the Draft DCO [AS-032]. The Outline SRMP [APP-204] provides the structure and the types of controls to be included within the detailed SRMP. The detailed SRMP will set out the locations of soil stockpiles and will further cover management of these stockpiles to ensure that the soil is not damaged. Topsoils and Subsoils will be stored separately from one another to ensure that soil profiles are returned in the same order to which they were removed, thus ensuring that any works will not lead to the downgrading of agricultural land within the order limits. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will

ExQ	Respondent	Question	Applicant's Response
			enable the land to be returned back to a comparable ALC grade. Monitoring procedures are outlined in the Outline SRMP [APP-204]. The monitoring procedures to be included as a minimum are outlined from paragraphs 4.2.30 to 4.2.35 of the Outline SRMP [APP-204]. The monitoring procedures include monitoring the soils conditions and weather during the construction and decommissioning stage as well as prior to any works required during the operational phase. Compaction will be monitored by inspecting the soils following the installation of the piles but prior to the installation of the PV panels, if compaction is found this will be remediated whilst the ground remains accessible. Any compaction that occurs during the operational phase and decommissioning phase will be remediated following the decommissioning stage. Any and all reinstated soils will be assessed by or on behalf of the contractor and signed off to record that the land and soils are in a suitable condition. Periodic monitoring by a qualified soil practitioner may be required. Any defects identified and agreed between the contractor and the agricultural

ExQ	Respondent	Question	Applicant's Response
			liaison officer will be ameliorated prior to handing back the land. The outline SRMP sets out an outline of the matters that need to be defined or secured. 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.

2.14 Traffic and transport

ExQ	Respondent	Question	Applicant's Response
Q1.14.1	The applicant	Reliance upon future mitigation and future approvals A number of the mitigation measures relied upon within the transport assessment would be developed, refined, agreed or approved only following any grant of development consent. Which of the mitigation measures remain subject to future approval, detailed design, agreement with highway authorities or approval through management plans?	The Applicant remains in active discussion with Norfolk County Council and National Highways to agree appropriate traffic mitigation measures and ensure the safe and efficient management of construction traffic on the local and strategic highway network. Mitigation measures that are subject to detailed design are Temporary Traffic Management measures including: • Agreeing with the Local Highway Authority (LHA) appropriate temporary speed management measures under a Temporary Traffic Regulation Order (TTRO) or advisory speed limits as part of temporary Traffic Management signage scheme. • The use of temporary traffic controls or traffic lights including manually controlled systems to facilitate safe vehicle manoeuvring. • The extent and duration of temporary lane closures or full road closures with the provision of suitable diversionary routes. • Confirming the location and number of new passing places or improvement of existing

ExQ	Respondent	Question	Applicant's Response
			passing places on the local road network to facilitate safe vehicle manoeuvring. In addition, the geographical scope, extent and timing of the pre and post road condition survey will be agreed with the LHA in the post-consent phase subject to detailed design. Further information on the management and mitigation measures is provided in Chapter 7 of the Outline CTMP [APP-201].

2.15 Water environment

ExQ	Respondent	Question	Applicant's Response
Q1.15.1	The applicant	Reliance on future site investigations What proportion of the proposed development area remains subject to future infiltration testing? Can the applicant confirm that the suitability, extent and effectiveness of any infiltration-based drainage measures cannot be finalised until that testing has been completed?	ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] Section 9 states that for the management of residual pollution risk/firewater runoff (BESS only), no infiltration will occur from the BESS, National Grid and Project Substation surface water drainage systems; they will be lined with an impermeable membrane to prevent the percolation of runoff and any potential contamination into the strata beneath. Furthermore, there will be negligible impact on the ground surface permeability of over the areas proposed for solar arrays, which will maintain its natural pattern of drainage. The use of infiltration drainage would therefore be limited to the standalone converter/inverter units and access tracks. The LLFA does not accept that the access tracks would remain permeable over their lifetime due to gradual compaction of the surface from vehicles. Therefore, there is a commitment to the provision of swales or filter drains running parallel to - or at the downstream end of – these tracks. These features would either allow infiltration where ground conditions allow through their base, or have a piped discharge to the nearest ditch, or a

ExQ	Respondent	Question	Applicant's Response
			combination of both. The spatial requirements have conservatively assumed that no infiltration is permitted, providing the most precautionary allowance at this stage (to be reassessed at detailed stage). ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] Section 3.3 provides an overview of the geology at and within the vicinity of the Order Limits based on historic borehole data. This shows that the majority of the Order Limits area is underlain by Diamicton which is shown to be clay and typically 15m to 25m in depth. There are limited areas of sand and gravel. From this information alone, whilst the LLFA has said that ground conditions can be highly variable across the area, the use of infiltration drainage within the Diamicton is likely to be very limited. Potential infiltration testing locations were discussed with the LLFA in a meeting on the 18 August 2026. The Applicant proposed undertaking 3 no. tests in a part of the Order Limits; two in the Diamicton and one in the Sand and Gravel Member. However, the LLFA advised that preliminary infiltration testing should include 1-2 tests per field/area and at detailed design further infiltration

ExQ	Respondent	Question	Applicant's Response
			tests would be required for each standalone/inverter location. The locations of the standalone/inverter units are not currently known and therefore providing this level of testing across the Order Limits could result in abortive work. Proportionate targeted infiltration testing (i.e. not in every field/Sub-Site) is being considered by the Applicant to demonstrate whether infiltration/Plan A is likely to be feasible. The Applicant is providing further information on the Plan B 'Discharge to Watercourse' option, to provide comfort to the LLFA that this solution is viable even if the infiltration testing provides unfavourable results. This has involved the preparation of the following additional outputs: • Modelling of the surface water attenuation for the 132kV Project Substations within Sub-Sites 4B, 7F and 10C, the 400kV Project Substation within Sub-Site 5A, and swales along a length of access track within Sub-Site 5A within InfoDrainage. • The preparation of additional drawings showing attenuation requirements for the

ExQ	Respondent	Question	Applicant's Response
			above and the swale routes for the access track; • Concept access track drainage drawings for the wider Order Limits showing location/routes of swales and indicative outfalls to ditches. These additional outputs have been submitted at Deadline 1 as an update to ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018].
Q1.15.2	The applicant	Reliance on future drainage design Can the applicant confirm that the drainage strategy remains at an outline level and that detailed drainage design would be undertaken following any grant of development consent? State the number of final drainage layouts, discharge locations and associated hydraulic calculations to be fixed for all elements of the proposed development.	The surface water drainage design has been developed based on the level of information available within the ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059] and detail drainage design will be undertaken at the detailed design stage following any grant of development consent. The surface water drainage design as submitted in March 2026 as part of ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [APP-162] used the Infodrainage 'Quick Storage Estimate' function for the BESS, National Grid and Project Substations. Due to the level of information available at the time of submission for the south-western area of the Order Limits, the attenuation volume was refined from the Quick Storage

ExQ	Respondent	Question	Applicant's Response
			Estimate through modelling the attenuation for the BESS, National Grid Substation and the 400kV Project Substations adjacent to the BESS and within Sub-Site 1B. The drawings submitted with the report outlines the attenuation volume required, allowable discharge rate and outfall to the nearest watercourse. This has been developed further to provide refined attenuation volumes for the Project Substations within Sub-Sites 4B, 5B, 7F and 10C within InfoDrainage, and swale sizing for a length of access track within Sub-Site 4B. Conceptual drawings have also been prepared showing the locations of access track swales, direction of fall of these swales and indicative outfalls to access tracks. This additional information has been submitted as an update to ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] at Deadline 1. The number of standalone inverter/converter units have not been confirmed at this stage; however it is envisaged that - should a positive drainage outlet be required - this would connect to an adjacent access track swale and would therefore not increase the number of outfalls required.

ExQ	Respondent	Question	Applicant's Response
			The update to the ES Volume 3, Appendix 9.1 - Flood Risk assessment & Outline Surface Water Drainage Strategy [AS-018] will include the further drainage drawings to identify the proposed indicative locations of access track swales, direction of fall of these swales and indicative discharge points to the existing local land drainage network. This will provide an indication of the number of discharge points, assuming no infiltration. The number of final drainage layouts, discharge locations and hydraulic calculations to be further provided at detailed stage cannot be verified at this point as it is dependent on the degree of further refinement to the design, the outcome of intrusive testing over the Order Limits and the requirements arising from further design evolution (e.g. the number of standalone inverter/converter units has not been confirmed at this stage).

2.16 Other matters

ExQ	Respondent	Question	Applicant's Response
Q1.16.1	The applicant	Ground conditions: adequacy of the ground conditions baseline and EIA With reference to ES Appendix 16.1, Phase 1 Ground Conditions Assessment [APP-184] and RRs, explain how the applicant has demonstrated that sufficient baseline information is available at the application stage to characterise ground conditions, groundwater and contamination receptors and to support the conclusion that no likely significant effects would arise, having regard to the absence of application-stage intrusive ground investigations and the proposed reliance on post-consent investigations and assessments.	The conclusion that no likely significant effects would arise from the construction, operation and decommissioning of the Scheme is considered by the Applicant to be supported and informed by a spatially and temporally robust and proportionate baseline dataset presented in Environmental Statement Volume 3: Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] that complies with the requirements of the National Policy Statements (NPSs), National Planning Policy Framework (NPPF), BS10175:2026 and Land Contamination Risk Management (LCRM). Overarching NPS EN-1 Sections, 5.11.5, 5.11.8, 5.11.17 and 5.11.18 relate to ground conditions and the potential risks associated with ground conditions, instability and contamination requiring that <i>“Applicants should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination”</i>. This has been achieved through the identification and assessment of potential sources of contamination in the Phase 1 Ground Conditions Preliminary Risk Assessment (PRA) using current and historical mapping, FOI requests to the Local

ExQ	Respondent	Question	Applicant's Response
			Authority and Environment Agency, other publicly available information and a site visit. The potential risks to human health (including construction workers) and controlled waters have been assessed leading to the conclusion that there are no likely significant effects. This conclusion will be supported through the assessment of data obtained during the subsequent Intrusive Investigation. The scope of the PRA and its compliance with specifically relevant guidance BS10175:2026 is summarised below. This is mirrored by Section P2 of the National Planning Policy Framework (NPPF) which states that, to inform assessments of <i>“ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and... the extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation”</i> ... <i>“Adequate site assessment information, prepared by a competent person, should be available”</i>. The NPPF further defines <i>“site assessment information”</i> as including <i>“a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All assessments of land potentially</i>

ExQ	Respondent	Question	Applicant's Response
			<i>affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites – Code of Practice)”.</i> ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] presents a land contamination Preliminary Risk Assessment (PRA) (Section 5), and a Ground Stability Risk Assessment, which includes a slope instability assessment (Section 4). The Ground Conditions assessment was undertaken in general accordance with BS 10175:2026, the recognised UK standard for the investigation of potentially contaminated land. Compliance was demonstrated through a comprehensive desk study, site walkover survey, review of historical and environmental information, and development of a Preliminary Risk Assessment and Conceptual Site Model to identify and assess potential contamination and land stability risks associated with the proposed development. BS10175:2026 states that a “<i>preliminary investigation</i>” (or desk study) “<i>should include reference to historical records and other sources of information, consultation with relevant sources and a site reconnaissance</i>”. BS10175:2026 further

ExQ	Respondent	Question	Applicant's Response
			states that <i>"the desk study should include at least collection and evaluation of information on..."</i> a) <i>The history of the site and adjoining areas, with particular attention to the nature of land uses, any industrial processes and other activities that could have been potentially contaminative including creation of anthropogenic ground, fly tipping and past demolition.</i> b) <i>Environmental database searches including regulated activities.</i> c) <i>Land uses and activities that could have modified the ground structure to create potential migration pathways.</i> d) <i>Review of any previous desk study or investigation of the site.</i> e) <i>The geological, geomorphological, geochemical, hydrogeological, hydrological, topographical, archaeological and ecological features and setting of the site and adjacent land.</i> f) <i>Contamination sources and potential pathways.</i> g) <i>Potential receptors of contamination (for example, trespassers, current and intended users, construction workers, surface waters,</i>

ExQ	Respondent	Question	Applicant's Response
			<i>groundwaters or nearby water abstractions, ecological receptors, mineral resources, buildings services and structures, property).</i> h) <i>The presence and proximity of current and historic waste management facilities and disposal sites or other sources of contamination".</i> The Environment Agency's Land Contamination Risk Management (LCRM) guidance states that a land contamination Preliminary Risk Assessment should be informed "<i>current and historical information about the site</i>" (see "<i>Collect information for the preliminary risk assessment</i>" bullet-point list at the link below). (https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm/lcrm-stage-1-risk-assessment#tier-1-preliminary-risk-assessment). The PRA provided within ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] is supported by baseline information as required by LCRM. The relevant representation responses that relate to baseline information (e.g., BEPS-423, BEPS-429, SPC-009, SPC-039, SPC-097 etc.) have typically re-iterated the baseline information and

ExQ	Respondent	Question	Applicant's Response
			the findings of the assessments, and have not provided any new baseline information.
Q1.16.2	The applicant	Ground conditions: reliance on post-consent assessment and mitigation Having regard to the EIA Regulations and relevant NPS requirements, explain why the applicant considers it appropriate to conclude that no likely significant effects would arise where foundation works risk assessments, hydrogeological risk assessments, detailed investigations, design refinement and other mitigation measures are proposed [APP-052] to be undertaken post-consent.	Likely significant effects in relation to ground conditions will not arise due to the incorporation of the embedded mitigation measures and complies with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and NPS EN-1. NPS EN-1 Section 5.4.13 requires consideration of sites of regional and local geological interest. As described in Section 3.7 of ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] these receptors have not been identified within the Order Limits or the Study Area and Assessment of Likely Significant Effects upon these receptors is therefore not required. Schedule 4 Section 5 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 state that the likely significant effects resulting from “<i>the emission of pollutants</i>” and “<i>the risks to human health</i>” – i.e., effects that can relate to exposure to contamination. Furthermore, NPS EN-1 Sections 5.11.8, 5.11.18 and 5.16.7 require that: • “<i>For developments on previously developed land, the applicant should ensure that they</i>

ExQ	Respondent	Question	Applicant's Response
			<i>have considered the risk posed by land contamination and how it is proposed to address this</i>”; • <i>“For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where contamination is present, applicants should consider opportunities for remediation where possible”</i>; and • <i>“The ES should in particular describe... The existing quality of waters affected by the proposed project” and “the impacts of the proposed project on water resources”</i>. The risks associated with land contamination (including risks to water resources) have been assessed through a land contamination Preliminary Risk Assessment (PRA), as presented in ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]. The PRA is informed by a robust baseline (as described in Q1.16.1). It is noted that only limited areas of the land within the Order Limits constitute <i>“previously developed land”</i>, with the majority of the land within the Order Limits having a longstanding history of only agricultural use.

ExQ	Respondent	Question	Applicant's Response
			The PRA concludes that the sources of potential contamination within the Order Limits result in risks of typically Very Low to Low. On this basis, and as agreed with the Environment Agency (see below) ground investigation to further refine the assessment of land contamination risks was not considered to be necessary at the application stage and will be undertaken post-consent. Where necessary, the interpretative assessment of the ground investigation will present proposals for how contamination will be “addressed” and “opportunities for remediation where possible”. NPS EN-1 Sections 5.11.5 and 5.11.17 state “where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use” and “Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination”. An Applicant must therefore ensure that the design of a development includes suitable mitigation against land contamination and land instability hazards. If the design of a development does not provide suitable mitigation against land contamination and land stability hazards, it is not suitable for use and therefore does not comply with the NPS.

ExQ	Respondent	Question	Applicant's Response
			On this basis all mitigation for ground conditions during all phases is embedded, as described in within ES Volume 1, Chapter 16 – Ground Conditions [APP-052]. As the design would result in a development that is suitable for use, the Assessment of Likely Effects results in assessments of Not Significant for all Ground Conditions effects. The majority of the land within the Order Limits is undeveloped and with a longstanding history of agricultural use. Such land is considered to be very low risk. Of the 4No. sources of potential contamination (SPCs) identified within the Order Limits: • SPCs 1 and 2 comprised large areas of former (now demolished and long-since restored to agricultural use) RAF airfields which were considered to present a Very Low to Low risk. • SPCs 3 and 4 are limited in size and the design of the Scheme included avoiding these areas; and On this basis, ground investigation was not considered to be required to support the assessments of Ground Conditions at the application stage. It was instead proposed that the land within the Order Limits be investigated via an intrusive ground investigation post-consent, to

ExQ	Respondent	Question	Applicant's Response
			refine the Conceptual Site Model (which summarises the potential <i>Sources</i> of contamination and <i>Pathways</i> through which they could migrate and impact sensitive <i>Receptors</i>) and provide information to inform the design of the Scheme. The ground investigation will be a combination of targeted investigation and assessment (including soils, groundwater, surface water and ground gases, as relevant) of the identified sources of potential contamination and a non-targeted approach across other areas where sources of potential contamination have not been identified. Where contamination is identified, it will be risk assessed and if required, mitigated or remediated. The design of the Scheme (informed by the results of the ground investigation and associated assessments, including any mitigation or remediation found to be necessary) will • Avoid (as far as is practicable) any potential land contamination or land instability constraints, or otherwise, • Include suitable design measures e.g., ground gas mitigation measures for any occupied spaces within the Project Substations, BESS or National Grid substation should a ground

ExQ	Respondent	Question	Applicant's Response
			gas hazard that requires mitigation be identified. Through incorporation of this embedded mitigation, significant adverse effects will be prevented from occurring. Foundation Works Risk Assessment (FWRA) will be undertaken post-consent for any structures requiring deep foundations and/or piling. The FWRA will be informed by the results of the ground investigation and associated assessments, including any mitigation or remediation found to be necessary. The purpose of FWRA is so the construction of piled foundations will not have an adverse impact upon controlled waters and human health receptors. Through undertaking FWRA and incorporating any mitigation measures recommended as part of the FWRA into the detailed design of the Scheme, significant adverse effects due to exposure to existing contamination through ground disturbance will be prevented from occurring. The proposal to undertake ground investigation and FWRA post-consent was agreed with the Environment Agency at a meeting on 27th March 2025.

ExQ	Respondent	Question	Applicant's Response
			Where trenchless crossings interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment (HRA) will be undertaken. Through undertaking HRA and incorporating any mitigation measures recommended as part of the HRA into the detailed design of the Scheme, significant adverse effects due to exposure to existing contamination through ground disturbance will be prevented from occurring. Similar can be said for each of the proposed embedded mitigation measures proposed in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] NPS EN-1 Section 5.11.19 requires that <i>“Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place”</i>. It was agreed with the Minerals Planning Authority (MPA) (Norfolk County Council) that any sterilisation of the minerals resource within the Order Limits was temporary, with the mineral made available again following the decommissioning of the Scheme. On this basis, only limited mitigation was requested by the MPA, including re-use within the Scheme of any

ExQ	Respondent	Question	Applicant's Response
			minerals incidentally extracted, e.g., during cable trench excavations as described in ES Volume 3, Appendix 16.2 – Minerals Resource Assessment Desk Study [APP-187] . With the agreed absence of permanent sterilisation, and with the inclusion of the mitigation measures requested by the MPA, significant adverse effects to safeguarded minerals resources are prevented.
Q1.16.3	The applicant	Waste and Materials: waste forecasting assumptions Provide a concise justification for the principal assumptions underpinning the construction, replacement and decommissioning waste forecasts [APP-054], including PV panel replacement rates, BESS replacement rates, recovery rates and recycling rates, and explain why the applicant considers those assumptions to represent an appropriate basis for assessment over the lifetime of the proposed development.	As set out under paragraph 18.5.15 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] waste and materials estimates associated with the Scheme have been provided by an EPC Contractor and are based upon other similar Nationally Significant Infrastructure Project (NSIP) schemes. Professional judgement has been used to qualitatively estimate if likely waste streams from unmeasured sources (paint, solvents, vegetation, etc.) that are not quantified in the EPC Contractor's waste and materials estimates, are likely to be significant or not. Recovery Rates have been based on the Waste and Resources Action Programme (WRAP) Designing Out Waste: A Design Team Guide for Civil Engineering (2010). Construction Assumptions

ExQ	Respondent	Question	Applicant's Response
			As noted above, construction waste estimates have largely been provided by an EPC Contractor and are based upon other similar NSIP schemes. The national target for recovery of construction and demolition waste is 70% by weight, as set out in the Waste Framework Directive and the Waste Management Plan for England. Recovery is deemed to include reuse, recycling, and other recovery methods such as energy recovery. A recovery rate of 70% is assumed be achievable for the purpose of the waste assessment. New provisional figures for 2025 of the UK statistics on waste show a total achieved recycling rate of 70.5% for packaging. Provisional figures for 2024 show that England generated 63.3 million tonnes of non-hazardous C&D waste, of which 60.3 million tonnes was recovered. This represents a recovery rate of 95.3% The Applicant considers that applying a 70% recovery rate remains appropriate and proportionate for the purposes of the assessment. It provides a conservative basis for forecasting construction waste. General Operation and Maintenance Assumptions Waste arisings during the Operational Phase are largely anticipated to be limited to replacement of

ExQ	Respondent	Question	Applicant's Response
			faulty or broken onsite infrastructure. An estimated failure rate of 0.05% of individual panels in the Solar PV Array per annum has been used based on professional experience. Replacement Activity Assumptions The assessment assumes an indicative PV panel design life of 40 years and therefore one replacement event during the Scheme's lifetime. This assumption is based on information available from PV panel suppliers. The assessment assumes that all PV panels across the Site would be replaced. The forecast replacement waste therefore includes both the replaced PV panels and the packaging associated with the delivery of replacement panels. The estimated quantities of replacement waste are based on information provided by the EPC Contractor. For the purposes of the assessment, the replacement of BESS infrastructure has been included up to five times during the Scheme's operational phase, based on a worst-case minimum operating lifespan of 10 years for BESS units. A 100% replacement of the BESS is assumed for each replacement event, representing a worst case assessment scenario for waste and materials assessment. The assumed replacement waste therefore includes the replaced BESS units and the packaging

ExQ	Respondent	Question	Applicant's Response
			associated with the delivery of replacement units. The estimated quantities of replacement waste are based on information provided by the EPC Contractor, and the estimated minimum design life for onsite infrastructure as set out at paragraph 4.5.32 in ES Volume 1, Chapter 4 - The Scheme [APP-040]. Decommissioning Assumptions The assessment assumes a 60-year operational life, with decommissioning anticipated in 2091. It assumes removal of PV panels, mounting structures, above-ground cabling, conversion units, Project Substations and BESS. Cable removal is also assumed for assessment purposes notwithstanding that the approach will depend upon government policy and best practice at the time. Recycling and Recovery Assumptions The following assumptions have informed the assumptions for recycling and recovery rates. There are several companies which provide recycling services for solar panels. These companies report that 90-99% of glass and semiconductor materials in end-of-life solar panels can be recycled or recovered for use in new panels.

ExQ	Respondent	Question	Applicant's Response
			The UK market for Lithium-ion (Li-ion) battery recycling is developing, driven by the rapid increase in electric vehicles and other Li-ion battery users. Several new investments in Li-ion battery recycling technology have been announced, and an 80% recovery rate is reported by companies operating in the battery recycling sector. It is expected that a growing private sector waste sector will develop facilities to meet market demands. This market growth is expected to be driven by the increasing number of PV and BESS installations, which are being implemented as part of the Government's initiative to achieve net zero emissions. Currently, PV Panel waste generation is low, resulting in limited demand for facilities and available capacity. Therefore, it is expected that facilities for reusing, recycling, or recovering end-of-life PV Panels will be developed as the waste stream demand increases. The WEEE Regulations 2013 require those who place PV Panels on the UK market to finance the costs of collection, treatment, recovery, and environmentally sound disposal. For the operational replacement and decommissioning assessment, the Applicant has adopted a precautionary assumption that 95% of WEEE and BESS material can be recycled or

ExQ	Respondent	Question	Applicant's Response
			recovered using Best Available Treatment Recovery and Recycling Techniques. On that basis, only approximately 5% of the relevant WEEE/BESS arisings are assumed to require landfill following treatment. The Applicant has therefore considered not only currently available treatment capacity but also the reasonably foreseeable development of recycling infrastructure over the lifetime of the Proposed Development. The volume of PV panel and BESS waste requiring management is expected to increase over time as the deployment of these technologies increases. This is expected to support continued investment in, and development of, reuse, recycling and recovery infrastructure. Having regard to the anticipated growth in the PV and BESS waste streams, the reported recovery rates for these materials and the long operational lifetime of the Proposed Development, the Applicant considers it proportionate to assume that appropriate recycling and recovery capacity will continue to develop and to adopt the above recovery assumptions for the purposes of the assessment. As set out in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], in accordance with the waste hierarchy, the Proposed Development will prioritise waste

ExQ	Respondent	Question	Applicant's Response
			prevention, followed by preparation for reuse, recycling and other forms of recovery, with disposal to landfill being considered as a last resort. These principles and the associated waste management measures are secured through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] secured by Requirements 13, 14, and 21 respectively of Schedule 2 to the Draft DCO [AS-032]. Adherence to the measures secured through the relevant management plans will require Site Waste Management Plans to be prepared for each phase of the Scheme. These plans will provide the mechanism for identifying waste streams, establishing appropriate reuse, recycling and recovery routes, identifying appropriately licensed waste management facilities and monitoring waste movements.
Q1.16.4	The applicant	Waste and Materials: confidence in decommissioning and replacement waste assessment conclusions Given the scale of forecast decommissioning and replacement waste arisings, explain the degree of confidence that can presently be placed in the assessment's conclusions [APP-054] for those phases and identify any assumptions regarding future recycling	The Applicant considers that the ExA can have confidence in the anticipated waste streams identified for the construction, operational, replacement and decommissioning phases. The forecast quantities have been calculated using information provided by the EPC Contractor based on the indicative layouts and development parameters provided by the Applicant, together with assumptions regarding equipment design life, replacement requirements and composition.

ExQ	Respondent	Question	Applicant's Response
		infrastructure, treatment capacity or waste markets on which those conclusions depend.	The Applicant recognises that there is a greater degree of uncertainty regarding the precise waste management facilities, technologies and markets that will be available when replacement and decommissioning occur. This is particularly relevant given the 60-year operational life of the Proposed Development and the anticipated decommissioning date of 2091. As set out under the future baseline section (paragraphs 18.5.52-54 in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]), <i>“there is no publicly available information about changes to landfill capacity by the time the Scheme is built. Forecasting suggests no void space would be available in future, but this is not considered a credible scenario. If landfill is required in the future, it is assumed that new capacity will be approved to meet this requirement. It is the waste authorities’ duty to manage and ensure that there is sufficient landfill capacity as required. Therefore, non-hazardous and hazardous landfill capacity is assumed to stay the same as the current baseline due to its cyclical nature whereby as capacity is reduced, it is assumed to be increased by new sites becoming available”</i>. Due to this lack of long-range forecasting for both inert/non-hazardous landfill void capacity space, it

ExQ	Respondent	Question	Applicant's Response
			has been considered that void capacity during the operational phase of the Scheme would be medium sensitivity, and during the peak replacement and decommissioning phases would be very high sensitivity to additional pressures. National void capacity for hazardous capacity is considered very high sensitivity at all phases of the Scheme. The Applicant believes this is a proportionate approach given the uncertainty surrounding future landfill void capacity both for inert/non-hazardous and hazardous waste. The Applicant has adopted conservative assumptions regarding the recovery and recycling of waste, as set out in the response to Q1.16.3, having regard to existing recovery targets, reported recovery rates and the anticipated development of recycling markets and infrastructure for PV panels and BESS. As set out in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] paragraph 18.5.134 <i>“Waste materials transported off-site will be delivered to a licensed waste disposal site. Currently, there are no baseline estimates for capacity at county recycling and landfill sites for the estimated earliest decommissioning date of 2091. Therefore, the sensitivity of these receptors cannot be accurately determined. For this assessment, it is assumed that sensitivity levels in</i>

ExQ	Respondent	Question	Applicant's Response
			2091 are the same as those in 2025. Technological advancements in recycling, reuse, and waste treatment may also change the outcomes compared to current technology". Taken together, the Applicant considers that the assessment provides confidence in the forecast waste arisings and assessment conclusion, while appropriately recognising the greater uncertainty associated with future waste management infrastructure and markets. The conclusions should therefore be understood as an assessment based on the best available information and reasonable assumptions at the time of assessment.
Q1.16.5	The applicant	Waste and Materials: hazardous waste capacity The applicant's procedural deadline A submission [PDA-008] refers to ES Chapter 18 [APP-054] identifying a moderate adverse and significant effect in relation to hazardous waste capacity during operation and decommissioning. Explain the evidential basis for this conclusion, including the quantities and principal waste streams assessed, the facilities and infrastructure assumed to be available, and the basis for	As set out in The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008] "<i>ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] assesses a moderate adverse and significant effect in relation to hazardous waste capacity during operation and decommissioning. Additional mitigation for this cumulative effect includes implementation of the Operational and Decommissioning Site Waste Management Plans, and a coordinated approach between site operators of relevant NSIPs to reduce any potential overloading of hazardous waste facilities</i>".

ExQ	Respondent	Question	Applicant's Response
		concluding that residual effects would be appropriately mitigated.	The response provided in PDA-008 referred to cumulative effects associated with the Scheme combining with effects associated with other developments. The relevant other developments assessed are listed in Table 18.21 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]. The developments listed in Table 18.21 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] have been considered as likely to contribute towards a considerable uplift in waste arisings within the temporal and geographic scope of this assessment. This is based on likely construction, operational and maintenance, and decommissioning phases for the developments assessed, and their scale to qualitatively determine the likelihood of significant effects. This assessment relies on assumptions from published information, and where unavailable, has relied on assumption based on the Scheme itself. Operational Phase <u>Operational and Maintenance Phase</u> As noted under Paragraph 18.5.152 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054], <i>"the Cumulative Schemes in the energy sector are likely to generate no more than negligible inert and hazardous waste. During</i>

ExQ	Respondent	Question	Applicant's Response
			<i>their operational lifetimes, the assessed residential and employment Cumulative Schemes are anticipated to generate a steady, but not substantial stream of waste relating to general household, or commercial and industrial (C&I) waste respectively. These waste streams are not anticipated to significantly increase waste arisings or handling requirements in the East of England above current or forecasted quantities".</i> <u>Peak Replacement Scenario</u> Considering the nature of the Scheme and other developments, only other developments in the energy sector are anticipated to have operational lifetimes that largely overlap, and as such, are likely to have similar requirements with regard to infrastructure replacement during their lifetimes, including a likely scenario where onsite solar and BESS infrastructure is renewed. In a worst-case scenario that these happen in a similar timeframe. The majority of the information has been informed by published information where available for each of the assessed cumulative developments. Where published information was not available, assumptions have been made based on the scale of the other development and the assumptions adopted for the Scheme. This is considered to represent a conservative approach.

ExQ	Respondent	Question	Applicant's Response
			Based on the timescales available, it is considered that the peak replacement scenario for the Cumulative DCO Schemes (i.e. approximately 30-40 years post-construction) may also coincide with the decommissioning phases of the cumulative TCPA approved solar and BESS developments that have been assessed. As a result of these assumptions, there may therefore be a worst-case peak where there is increased WEEE and waste batteries to be disposed of in a condensed period. An estimated worst-case of 11,800 m³ (~17,200 tonnes) of WEEE and waste batteries generated by the cumulative replacement scenario is anticipated to go to landfill following treatment. This therefore is equivalent to 0.13% of the national landfill void capacity for hazardous waste (as of 2024). The wider Study Area for hazardous waste (including WEEE) – England is used for the hazardous waste study area as treatment of hazardous waste and WEEE operates at a national scale. As noted in the future baseline, hazardous landfill capacity is assumed to stay the same as the current baseline due to its cyclical nature whereby as capacity is reduced, it is assumed to be increased by new sites becoming available.

ExQ	Respondent	Question	Applicant's Response
			Based on the methodology, in line with ISEP guidance, the cumulative magnitude of impact to hazardous waste void capacity is therefore considered to be minor. Due to the receptor's very high sensitivity, the cumulative effect is moderate or large adverse, which is considered significant. <u>Decommissioning Phase</u> The Scheme, and The Drovers Solar Farm DCO are anticipated to have up to a 60 year operational lifetime, while the High Grove Solar DCO and EcoPower Suffolk Solar DCO are anticipated to have up to 40-year operational lifetimes. However, in considering a worst-case scenario in which all Cumulative DCO Schemes are decommissioned after approximately 40 years, there is a scenario in which waste arisings from decommissioning could have a cumulative effect on waste handling capabilities and landfill void capacity. For the purpose of this assessment, it is assumed that the Cumulative Schemes in employment and residential use are permanent, and therefore do not have a projected decommissioning phase. As with the peak replacement scenario, the assumptions have been based on published information available for each of the assessed cumulative developments, and where this is not available, assumptions have been made based on

ExQ	Respondent	Question	Applicant's Response
			the scale of the other development, based on assumptions made for the Scheme. As during their operational lifetimes, the Cumulative Schemes in the energy sector are anticipated to be committed to achieving 'Best Available Treatment Recovery and Recycling Techniques' which indicatively demonstrate that 95% of WEEE from decommissioning can be recycled or recovered (see Table 18.13 in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]). This is considered to apply directly to Solar PV infrastructure, BESS infrastructure, and large-scale installations such as Inverters and Transformers. All of these are likely to be managed by specialist contractors who are likely to achieve high recovery and recycling rates. As such, an estimated worst-case of 15,100 m³ (~15,600 tonnes) of WEEE, BESS, and large-scale installations generated by the decommissioning of these cumulatively assessed DCOs is anticipated to go to landfill following treatment. This therefore is equivalent to 0.16% of the national landfill void capacity for hazardous waste (as of 2024). Together, the cumulative magnitude of impact to hazardous waste void capacity is therefore considered to be minor. Due to the receptor's very high sensitivity, the effect is

ExQ	Respondent	Question	Applicant's Response
			a cumulative moderate or large adverse effect, which is considered significant. This, however, should be understood in the context of a lack of forecasting for hazardous waste landfill void capacity, and a lack of forecasting of the quantum of specialist solar and BESS waste management facilities that are likely to arise to meet future demand. The future economic value of solar and BESS waste is anticipated to encourage technological advancement to increase the quantity of materials that are reused or recycled, reducing future landfill need. Additional Mitigation The Operational Site Waste Management Plan (as secured via the Outline OEMP [APP-197] by Requirement 14 of Schedule 2 to the Draft DCO [AS-032]) and Decommissioning Site Waste Management Plan (as secured via the Outline DEMP [APP-198] by Requirement 21) must both ensure that hazardous waste handling capabilities are assessed based on up-to-date information at the time of drafting prior to decommissioning works being undertaken. Where significant cumulative effects on hazardous waste handling facilities from the replacement works or decommissioning of multiple Nationally Significant Infrastructure Projects are assessed as likely to

ExQ	Respondent	Question	Applicant's Response
			occur, a coordinated approach between site operators of those relevant Nationally Significant Infrastructure Projects should be secured ahead of the commencement of decommissioning activities. This should include measures, as necessary, to stagger decommissioning works across Nationally Significant Infrastructure Projects, staggering the delivery of hazardous waste arisings requiring treatment to relevant facilities, and securing suitable and safe hazardous waste storage if required to delay delivery to hazardous waste treatment facilities, to reduce overloading of hazardous waste facilities as secured through the Outline OEMP [APP-197] and Outline DEMP [APP-198] .

Appendix A: Fire Risk and Emergency Response Schedule

Annex A: Fire Risk and Emergency Response Schedule (provided in response to EXA Q1.6.4)

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
Detailed Battery Safety Management Plan (BSMP)	To provide the final BESS failure safety provisions for the BESS at the detailed design stage, prior to commencement of construction of the BESS.	Draft DCO [AS-032] requirement 6 requiring submission and approval of a BSMP prior to commencement of BESS construction.	It is assumed that the final BSMP will be substantially in accordance with the Outline BSMP [APP-200] and will incorporate the latest good practice.	The final BSMP will be substantially in accordance with the Outline BSMP. Additional testing requirements, safety standards, or refined mitigation measures may be incorporated into the detailed BSMP.	The use of outline management plans uses a well-established approach for NSIP projects and reflects that details, such as the final BESS design, are developed at a later stage. The Outline BSMP establishes the mitigation and management framework and demonstrates that risks can be appropriately managed, confirming acceptability of the Scheme. The final BSMP will be substantially in accordance with the Outline BSMP, therefore the Applicant considers that the ExA is able to reach an informed decision on likely

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
					significant effects based on the Outline BSMP.
Consultation with Norfolk Fire and Rescue Service (NFRS) and the Environment Agency (EA) on the final BSMP	To seek input from stakeholders on final emergency response arrangements and environmental protection controls to be incorporated into the final BSMP.	Requirement 6 of the Draft DCO [AS-032] secures that the detailed BSMP would be approved by the relevant planning authority in consultation with NFRS and the EA.	It is assumed that the final BSMP will be approved in consultation with NFRS and the EA.	Consultation with NFRS and the EA is secured by DCO requirement. Consultation may identify additional operational controls or refinements to be included within the final BSMP. Section 2.1.5 of the Outline BSMP [APP-200] states: " <i>The Applicant has complied with NFCC guidelines and engaged with NFRS during the pre-application stage and will ensure that the BSMP</i>	NFRS and the EA have been consulted pre-application, and the Outline BSMP [APP-200] establishes the mitigation and management framework and demonstrates that risks can be appropriately managed. Consultation with NFRS and the EA will refine measures rather than establishing acceptability.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
				<i>accounts for any subsequent revisions made to NFCC guidelines. Close consultation will continue with NFRS post-consent, should the Scheme be granted consent."</i>	
Confirmation of detailed BESS design	The final BESS design and battery system specifications will be confirmed as part of the detailed design prior to the commencement of construction of the BESS	The detailed design of the BESS must accord with the Design Principles, Parameters and Commitments [APP-213] , which specifies that the BESS will be a lithium-ion battery system. The final BSMP must include the detailed design, as	For the purposes of the Outline BSMP, a concept design has been considered that uses a BESS system based upon LFP lithium-ion battery technology that is currently used on other solar projects being developed by the Applicant. This is considered to be a reasonable worst case for the purposes of the assessment in terms of	The final battery chemistry and BESS design must be incorporated into the final BSMP for approval, therefore the final design would be subject to further assessment to confirm that the conclusions of the Outline BSMP [APP-	The Outline BSMP [APP-200] adopts a reasonable worst-case approach and requires any final design to comply with applicable standards and safety requirements as outlined in 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</i>

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
		secured by the Outline BSMP [APP-200] . This is secured under Requirement 5.	BESS toxic gas emission potential and explosion risk.	200] remain valid and that applicable standards and safety requirements have been met.	<i>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</i>

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
					<i>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> The detailed design will be provided within the final BSMP, which will be approved by the relevant planning authority in consultation with NFRS and the EA.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
Large Scale Fire Testing (LSFT), UL9540A testing, and consequence modelling of the final BESS design and layout	To validate safe equipment spacing	Secured through the Outline BSMP and DCO Requirement 6.	The Applicant's conclusions are based on use of a tested and certified BESS complying with recognised industry standards. The selected BESS design and layout will have successfully undergone recognised fire testing to establish minimum equipment spacing distances. Consequence modelling will demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS.	If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system specification.	Sections 5.1.3 – 5.1.6 of the Outline BSMP [APP-200] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. The Applicant will also commission site specific heat flux and flame tilt consequence modelling (Section 5.1.6) to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
					stipulated in Section 5.1.5 of the Outline BSMP [APP-200]. Section 5.1.7 of the Outline BSMP [APP-200] clarifies that: <i>“If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system specification. These studies will be completed and signed off before construction commences.”</i> The final BESS design will be fully tested and certified to the latest BESS safety standards and this will be reflected in the final BSMP approved by the relevant planning authority in

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
					consultation with NFRS and the EA.
Detailed design Plume Study	To assess the environmental impact of a BESS incident to sensitive receptors within a 1km radius, based on the detailed design. The detailed design Plume Study will inform the final BSMP.	Secured through the Outline BSMP [APP-200] and Draft DCO [AS-032] Requirement 6.	The Plume Study completed at the outline stage has been based on a series of worst-case assumptions and is considered to be sufficiently conservative to inform the assessment of likely significant air quality effects. The concept design is based on a BESS system using LFP lithium-ion battery technology and is similar to that currently used on other solar projects being developed by the Applicant. The worst-case assumptions applied to the assessment are presented in section 2.6 of the Plume Study and include: A lower peak temperature for the	As the air quality impacts associated with the detailed design Plume Study are not expected to be greater than those predicted at the outline stage using the worst-case assumptions, it can be concluded that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.	Final modelling can only be completed when based upon the specific BESS design selected at the detailed design stage. A Plume Study has already been undertaken using reasonable worst-case assumptions and demonstrates no significant adverse effects at residential receptors. As the BESS design and system chemistry type is not yet finalised, the Applicant has committed to commissioning a detailed design Plume Study. The detailed design Plume Study will inform the final BSMP, which is to be submitted to and approved by the relevant planning authority in

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
			battery fire than typically observed for 5 MWh BESS systems which will reduce air pollutant dispersion. • An assessment of six worst-case BESS fire locations based on the maximum parameters of the illustrative BESS layout. • Peak emission rates have been assumed to be sustained for up to 8 hours. • It is assumed that the initiating unit is at 100% State of Charge, resulting in a short burn duration at high temperature and the greatest peak emissions. • A sensitivity scenario has been assessed whereby peak emission		consultation with NFRS and the EA prior to the commencement of the works for the BESS under Requirement 6. The BMSP will be substantially in accordance with the Outline BSMP [APP-200] and will identify any required mitigation to ensure air quality impacts during a BESS fire are effectively controlled.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
			rates have been doubled in comparison to the Core Scenario, which will result in peak hydrogen fluoride emission rates greater than those typically recorded for 5 MWh capacity BESS units. The assessment in Appendix B of the Outline BSMP [APP-200] concludes that there will not be significant adverse effects at the closest residential receptor locations in the event of a BESS fire incident. The UK Health Security Agency (UKHSA) is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the		

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
			<i>"proposed development should not result in any significant adverse impact on public health."</i>		
Emergency Response Plan (ERP)	To establish detailed emergency response procedures, responsibilities, communication arrangements and site-specific actions.	Secured through the Outline BSMP [APP-200] and Draft DCO [AS-032] Requirement 6.	A site-specific ERP will be developed and agreed as part of the final BSMP in accordance with NFCC and NFPA 855 (2026) guidance. The ERP shall include the following: procedures for safe operational shutdown, inspection testing and maintenance, BESS response procedures, fire response procedures, safety data sheets, emergency contract information, FRS operations and response procedures, etc.	Section 4.4.3 – 4.4.5 of the Outline BSMP [APP-200] stipulates that the Emergency Response Plan (ERP) will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: <i>"Emergency procedures for all credible hazards and risks, including building, infrastructure and</i>	A final ERP can only be drafted when based upon the specific BESS design selected at the detailed design stage. The Outline BSMP [APP-200] demonstrates that an appropriate emergency response framework can be implemented and identifies the minimum content of the ERP.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
				<i>vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.” Emergency response protocols and	

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
				procedures will be refined to reflect the final BESS design and post-consent consultation with NFRS.	
Risk Management Plan (RMP)	The RMP shall be developed by NFRS and will provide advice in relation to potential emergency response implications.	Secured through the Outline BSMP [APP-200] and Draft DCO [AS-032] Requirement 6.	A RMP shall be developed with NFRS post consent at the detailed design stage which, as a minimum, will provide advice in relation to potential emergency response implications including: • The hazards and risks to the facility and their proposed management; • Any safety issues for firefighters responding to emergencies at the BESS facility; • Safe access to and within the facility for emergency vehicles	Additional response measures or operational controls may be identified in consultation with NFRS.	A final RMP can only be drafted when based upon the specific BESS design selected at the detailed design stage. The Outline BSMP [APP-200] identifies the minimum content of the RMP.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
			and responders, including to key site infrastructure and fire protection systems. Establishment of response times and site arrival protocols; • The adequacy of proposed fire detection and suppression systems e.g., water supply on-site; and • Natural and built infrastructure and on-site processes that may impact or delay effective emergency response i.e., firefighting water runoff capture.		
Failure Modes and Effects Analysis (FMEA) or Layer of	To assess potential failure mechanisms and identify preventive and	Secured through the Outline BSMP [APP-200] and Draft DCO [AS-032] Requirement 6.	The analysis will demonstrate low failure likelihood and appropriate mitigation. The analysis minimises the probability of a BESS	Assessment tools such as FMEA reports specifically focus on a range of failure	Section 5.1.3 of the Outline BSMP [APP-200] specifies: "As stipulated in NFPA 855 (2026), a Failure Modes and Effects Analysis

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
Protection Analysis (LOPA)	protective controls.		failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. The analysis will demonstrate that under day-to-day operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated.	mechanisms and identify how to prevent and / or mitigate credible failure scenarios. An agile method is applied during the engineering design phase for BESS failure safety analysis. The analyses are updated based on any changes of the project context and during the design process from the selected contractors in case of any deviation from the initial set of technical requirements. These would be finalised before	(FMEA) of the BESS (BS EN IEC 60812) or Layer of Protection Analysis (LOPA) of the BESS will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. This key analysis minimises the probability of a BESS failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. These types of risk analysis provide confidence to demonstrate that under day-to-day operation there is a low risk of a

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
				construction commences.	BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low."
Hazard Mitigation Analysis (HMA)	To assess system-specific hazards and confirm adequacy of mitigation measures based on testing and modelling.	Secured through the Outline BSMP [APP-200] and Draft DCO [AS-032] Requirement 6.	The selected BESS design will be demonstrated to comply with applicable standards and mitigation requirements.	Additional mitigations could be recommended for incorporation in the final detailed design.	A HMA can only be completed when based upon the specific BESS design selected at the detailed design stage. The Outline BSMP [APP-200] already identifies the key fire safety provisions and secures the requirement for a HMA at detailed design stage.

Mitigation / Control Measure	Purpose	Securing Mechanism	Current assumption relied on in the Applicant's conclusions	Consequence if outcome differs materially from current assumptions	Is it required to confirm the acceptability of the Scheme? / Why the ExA can reach an informed conclusion now
BESS drainage design	Confirmation of the final drainage design for the BESS.	Secured through Requirement 11 of the Draft DCO [AS-032] .	The BESS drainage system will be designed to isolate and contain such flows to prevent pollution of the surrounding environment. Further detail is provided within paragraphs 4.5.5-4.5.9 of the Outline BSMP secured through Requirement 6. ES Volume 1, Chapter 9 – Water Environment [APP-045] assesses impacts from contaminated firewater in the unlikely event of a fire at the BESS, and concludes that with embedded mitigation measures the effect is minor adverse and not significant.	The final drainage design and BSMP would need to demonstrate that the management of surface water and fire-water runoff remains effective and that the conclusions of the assessment remain valid.	A final drainage design can only be completed when based upon the specific BESS design selected at the detailed design stage. The principles of the BESS drainage system are detailed within the Outline BSMP [APP-200] and ES Volume 1, Chapter 9 – Water Environment [APP-045] which demonstrate that there would be no significant adverse effects. The final drainage design is secured through DCO requirement.

Annex B: Schedule of Heritage Assets

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Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Saxlingham Nethergate Conservation Area	SNC-016 SNPC-29	Saxlingham Nethergate, c.400m to the north of sub-Site 7D	Historic paths/routes/trackway	No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.162
Saxlingham Nethergate Conservation Area	SNPC-017 SNPC-29 CUL-009 CUL-036	Saxlingham Nethergate, c.400m to the north of sub-Site 7D	Concerns over impact to conservation area and listed buildings therein	The Applicant's 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. It has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.162

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				this would result in moderate adverse effects in the long term which are reversible as reported in ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120], and ES Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The assessment of potential impacts to Saxlingham Nethergate,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Saxlingham Green, Listed Buildings, and Conservation Areas have been provided within ES Volume 3, Appendix 10.1 – Heritage Statement Part 1 [APP-165 – APP-168] and ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], both of which have been undertaken in accordance with appropriate guidelines. It is noted that AIL routes may potentially be required within the boundaries of both Saxlingham Nethergate Conservation Area and Saxlingham Green Conservation Area; however, any movements within each of these conservation area boundaries would be limited during the construction phase to ensure any impacts are kept to a minimum. These works are detailed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] will be managed by the Outline CTMP [APP-201]. No potential 'strikes or swipes' have been identified with heritage assets within either	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				conservation area, and there are no concerns regarding vibrations and heritage assets. It is considered that due to the temporary nature of these works, there will be no harm to the character or appearance of the conservation areas. It is further noted in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] that the setback established south of Church Hill, between Saxlingham Green and Saxlingham Nethergate, has been established primarily due to archaeological sensitivity within this area. The other setbacks in Sub-Site 7D and the northern part of Sub-Site 7F include the removal of Solar PV Panels from those fields which are situated adjacent the eastern and western approaches into the conservation area, with these areas to be retailed as grassland. Several linear belts of broadleaf woodland will also be established within the northern parts of Sub-Site 7D and 7F,	

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				continuations of established woodland already present within the landscape south of Saxlingham Green. The Applicant assumes this is in reference to Saxlingham Nethergate. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], notes that an AIL route is potentially required through Saxlingham Nethergate. Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned, as detailed in ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174-APP-177], and managed in accordance with the Outline CTMP [APP-201] to ensure the protection of heritage assets.	
Hundred Lane (RB19)	SNC-016	Runs between sub-Site 1B	Historic paths/routes/trackway	No historic paths have been identified as having any particular	Not assessed

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
	SNC-22 CUL-019	and the Proposed BESS, Great Moulton	To reduce the level of harm and more effectively mitigate the impact, it is suggested that the field immediately west of the proposal is also omitted.	heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant does not consider that the removal of the field to the west of Moulton Farmhouse would change the level or magnitude of impact. Under the proposals, solar PV arrays are set back from the property by 150m and a new linear tree belt proposed to reinforce an existing tree filled boundary. As a result, following establishment of landscape measures views may be partially visible from the Listed Building, but this visibility would not be at a detriment to the significance of the heritage asset as a whole. Users of PRow FP13 travelling east already experience varying degrees of filtering of views towards Moulton Farmhouse as a	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				result of intervening vegetation along the PRow and on field boundaries in the wider landscape. The visual amenity of users of Hundred Lane (RB19) is variable as a result of the dense tree belt present along this route to either side but is typically enclosed in nature. The Scheme includes a set back from Hundred Lane of ~50m, to provide separation, and for additional tree planting. The Applicant agrees that this additional tree planting identified as S1b-5b on the Green Infrastructure Strategy [AS-005] would provide visual screening of the Scheme to the north and reinforce this sense of enclosure, however this enclosure is an existing characteristic of this section of Hundred Lane. The Applicant notes the concern regarding Hundred Lane, which bisects Site 1. Any construction effects on this link would be temporary in nature and managed through the measures set out in the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Outline CTMP [APP-201] alongside the Outline PRow PPMP [APP-203]. Detailed management plans will be prepared substantially in accordance with the outline management plans and will be approved by the relevant planning authority in consultation with the relevant highway authority pursuant to the Requirements of the Draft DCO [AS 032] prior to construction. The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [AS-020 – AS-021]. No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from PRow, including those on Hundred Lane, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP 043].	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Moulton Farmhouse, Grade II LB (NHLE 1373270)	SNC-020, SNC-021 BEPS-292 BEPS-293	c.150m to the east of sub-Site 1B, Great Moulton	Concerns over impact to this asset	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. The proposals will result in a loss of a single vista of Moulton Farmhouse from PRoW FP13, which transects Sub-Site 1B, due to the presence of the	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 42-43, 48-49

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Project Substation here and associated screening proposals. This view is considered to be important in illustrating the Listed Building's architectural interest and aesthetic value within its countryside setting, and was therefore concluded within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] that this would cause less than substantial harm at the lowest end of the scale in terms of the NPSs EN-1 and EN-3, and a 'low-level of harm' in NPPF (August 2026) terms. In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168]. The proposals will result in a loss of a single vista of Moulton Farmhouse from PRow FP13, which transects Sub-Site 1B, due to the presence of the Substation here and associated screening proposals. Users of PRow FP13 travelling east already experience varying degrees of filtering of views towards Moulton Farmhouse as a result of intervening vegetation along the PRow and on field boundaries in the wider landscape. While this view is acknowledged as being important in illustrating the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Listed Building's architectural interest and aesthetic value within its countryside setting, it is considered that the majority of the rural setting of the Farmhouse will be unaltered, and it is not considered that the glimpsed or heavily filtered views of Solar PV Panels or small sections of the Substation will impact the overall cohesiveness of this setting, so as to affect the significance of the Farmhouse. It was therefore concluded that there would be less than substantial harm at the lower end of the scale, in terms of the NPSs EN-1 and EN-3, and a 'low level of harm' in NPPF (August 2026) terms, to this Grade II designated heritage asset.	
Moulton Farmhouse, Grade II LB (NHLE 1373270)	SNC-022	c.150m to the east of sub-Site 1B, Great Moulton	To reduce the level of harm and more effectively mitigate the impact, it is suggested that the field immediately	The Applicant does not consider that the removal of the field to the west of Moulton Farmhouse would change the level or magnitude of impact. Under the proposals, solar PV arrays are set back from the property by 150m and a new linear	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement (APP-165], p. 42-43, 48-49

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			west of the proposal is also omitted.	tree belt proposed to reinforce an existing tree filled boundary. As a result, following establishment of landscape measures views may be partially visible from the Listed Building, but this visibility would not be at a detriment to the significance of the heritage asset as a whole. Users of PRow FP13 travelling east already experience varying degrees of filtering of views towards Moulton Farmhouse as a result of intervening vegetation along the PRow and on field boundaries in the wider landscape. The visual amenity of users of Hundred Lane (RB19) is variable as a result of the dense tree belt present along this route to either side but is typically enclosed in nature. The Scheme includes a set back from Hundred Lane of ~50m, to provide separation, and for additional tree planting. The Applicant agrees that this additional tree planting identified as S1b-5b on the Green Infrastructure Strategy [AS-005]	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				would provide visual screening of the Scheme to the north and reinforce this sense of enclosure, however this enclosure is an existing characteristic of this section of Hundred Lane.	
Barn Cottages, Grade II Listed (NHLE 1050010)	SNC-20	c.300m to the south of Proposed BESS, c.1.4km to the north of Tivetshall St Margaret	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 47, 50-52

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				whole, not just to one specific element.	
Hill House, Grade II listed (NHLE 1152265)	SNC-20	c.50m to the north of the northern tip of sub-Site 7D, c.350m to the south of Saxlingham Nethergate	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 118-119, 121

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Hill House, Grade II listed (NHLE 1152265)	SNC-032	c.50m to the north of the northern tip of sub-Site 7D, c.350m to the south of Saxlingham Nethergate	There is an important cluster of historic buildings to the north of the site, including Hill House (1152265) and Hill Cottages (1373062), and Low Farm, which although unlisted, is of some age, appearing on earlier maps and featuring a steep roof that was likely originally thatched. This forms part of a group of historic houses as well as a historic trackway (FP13). The solar panel installations have the potential to be visible when passing through the landscape from the north. It is unclear what the mitigation comprises.	The Scheme includes a setback of ~100m from the group of properties on Church Hill. The geophysical survey (ES Volume 3, Appendix 10.3 - Archaeological Geophysical Survey Report [AS-022]) identified numerous linear, rectilinear and curvilinear anomalies possibly representative of a multi-period settlement within the northern part of Sub-Site 7D, immediately south of Church Hill. As such, a setback was established within this part of Sub-Site 7D for the protection of these likely archaeological remains. Within this set back a range of landscape measures are proposed as identified on the Green Infrastructure Strategy [AS-005] . Firstly, the majority of the land is proposed to be converted to a wildflower grassland as a biodiversity net gain benefit. A new hedgerow field boundary / tree belt (S7d-4) is proposed to the south of the set back / grassland area which ties up to existing field boundaries	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 118-119, 121

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				to the east. Furthermore, additional tree planting within the road side hedge line is proposed (S7d-7). The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to the implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 of the Draft DCO [AS 032]. The Applicant disagrees with the consultee in that the Scheme would result in low adverse harm and the low end of less than substantial harm to the identified heritage assets. The retention of the northern part of Sub-Site 7D as open fields would maintain the rural setting south of the group of heritage assets along Church Hill. Collectively, the mitigation measures would provide visual screening and filtering of views towards the Scheme in a	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				sympathetic way which avoids introducing new dense woodland planting in proximity to the heritage assets and would further retain the sense of openness when travelling along Church Hill between Saxlingham Nethergate and Saxlingham Green Conservation Areas. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including FP13, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant maintains that with the embedded and proposed mitigation measures in place, there will be no harm to the identified heritage assets.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
The Cedars, Grade II listed (NHLE 1304177)	SNC-20 BEPS-292 CUL-022 CUL-028	c.85m to the south of sub-Site 4B at the northern edge of Stratton St Michael	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Assessment of potential impacts to the Grade II The Cedars (NHLE 1304177) is provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 73-74, 79

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], with this latter assessment addressing curtilage buildings of The Cedars. The Applicant considers that the assessment of The Cedars, including a discussion of curtilage, has been produced in line with the relevant legislation, policies and guidance, and is considered to be robust and appropriate for the assessment of the Scheme. The assessment has concluded that Tumbrel Barn and The Dairy should be viewed in terms of what they contribute to the principal listed building (The Cedars) and its setting, which is limited to the historic connection. Solar PV Panels have been removed from those areas of Sub-Site 4B to the north-east, east and south-east of these buildings, with much of these areas to be retained as grassland. To the north-east, a new linear native broadleaf woodland will be established,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				which will be a continuation of the established veteran trees already present to the north of The Cedars. To the north-west of The Cedars, views of Solar PV Panels within Sub-Site 4A will be oblique and beyond the busy A140 (Norwich Road). They will also be set at a considerable distance and will constitute a small part of wider vistas from the upper storeys of The Cedars. Whilst the slight visibility of Solar PV Panels within this Sub-Site is acknowledged by the Applicant, it is considered that the intervisibility due to the slight change in its setting will not result in any harm to the significance of The Cedars (see ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]). The Applicant is assuming this representation is in reference to the Grade II Listed The Cedars (NHLE 1304177), which is the only Designated heritage asset which meets this criteria.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				The Applicant notes the Scheme extends to c. 70m east of the Grade II Listed The Cedars (NHLE 1304177) at their nearest points. Solar PV Panels have been removed from those areas of Sub-Site 4B to the north-east, east and south-east, with much of these areas to be retained as grassland. To the north-east, a new linear native broadleaf woodland will be established, which will be a continuation of the established veteran trees already present to the north of The Cedars. To the north-west of The Cedars, views of Solar PV Panels within Sub-Site 4A will be oblique and beyond the busy A140 (Norwich Road). They will also be set at a considerable distance and will constitute a small part of wider vistas from the upper storeys of The Cedars. Whilst the slight visibility of Solar PV Panels within this Sub-Site is acknowledged by the Applicant, it is considered that the intervisibility due to the slight change in its	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				setting will not result in any harm to the significance of The Cedars (ES Volume 3, Appendix 10.1 – Heritage Statement [APP 165 – 168]).	
The Cedars, Grade II listed (NHLE 1304177)	SNC-30	c.85m to the south of sub-Site 4B at the northern edge of Stratton St Michael	Further mitigation is required.	The Applicant notes the Scheme extends to c. 70m east of the Grade II Listed 'The Cedars' (NHLE 1304177) at their nearest points. As part of the initial design process, solar PV Panels have been removed from those areas of Sub-Site 4B to the north-east, east and south-east, with much of these areas to be retained as grassland. To the north-east, a new linear native broadleaf woodland will be established, which will be a continuation of the established veteran trees already present to the north of The Cedars. To the north-west of The Cedars, views of Solar PV Panels within Sub-Site 4A will be oblique and beyond the busy A140 (Norwich Road). They will also be set at a considerable distance and will constitute a small	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 73-74, 79

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				part of wider vistas from the upper storeys of The Cedars. Whilst the slight visibility of Solar PV Panels within this Sub-Site is acknowledged by the Applicant, it is considered that the intervisibility due to the slight change in its setting will not result in any harm to the significance of The Cedars (ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]). A reduction in height from 4.5m to 3m would result in the same conclusion of significance, which is already considered to be very minor and not harmful to the significance of The Cedars.	
Wood Farmhouse, Grade II listed (NHLE 1373238)	SNC-20	On the southern edge of sub-Site 7C, c.1.5km to the east of Tasburgh	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 103, 106

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element.	
Wood Farmhouse, Grade II listed (NHLE 1373238)	SNC-031	On the southern edge of sub-Site 7C, c.1.5km to the east of Tasburgh	The proposal provides a setback from the assets, with landscape tree planting comprising native broadleaf woodland and linear tree belts intended to screen the panels and mitigate harm. However, this would create a sense of enclosure to the north, contrasting	The Applicant notes that the Scheme extends up to the northern boundary of Wood Farmhouse (NHLE 1373238). The present landscape surrounding the heritage asset is not defined by its openness; rather it is bordered by ancient woodlands to the east and west, and further enclosed by mature tall hedgerows and trees across the field boundaries of the surrounding areas. Longer range views of the buildings are screened by the rising topography to the	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 103, 106

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			with the currently relatively open farmed landscape character. While the landscaping measures would be permanent and designed to screen taller 4.5m high solar panels, a preferable approach would be to use natural hedgerow planting with 3m high solar panels, thereby preserving the sense of rural agricultural openness that currently exists to the north of the assets.	north, with views of the Listed Building from within Sub-Site 7C highlighting the structure 'nestling' within the surrounding landscape. The roofline of the building is the primary feature in these longer range vistas. These views of the building from within Sub-Site 7C south give a better sense of openness, with views tunnelled between the two areas of ancient woodland. These views south would not be affected by the Scheme. As part of the initial design process, Solar PV Panels have been removed from those areas of Sub-Site 7C to the north of the heritage asset, with the land to the north of Wood Farmhouse to be retained as agricultural land and utilised for as skylark mitigation. This space will be bounded to the north by new native broadleaf woodland and linear tree belts. This substantial set-back to Wood Farmhouse is considered to retain a sufficient buffer of open land to preserve what limited, existing	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				sense of openness can be experienced from this asset, with the proposed woodland and tree belts to the north not considered to impose or dominate this sense of openness. The Applicant disagrees that a revised design scheme is required to minimise impacts to Wood Farmhouse. At present, it is considered that the established setbacks between the heritage asset and the developable area is considered sufficient to ensure that the Solar PV Panels will not be overly prominent within any views from or of the asset. The reduction of Solar PV Panel height to 3m, as well as an associated reduced screening height, would not have any meaningful effect on the sense of openness/enclosure of the surrounding landscape, nor would it allow for a greater ability to understand the setting of Wood Farmhouse.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Grove Farmhouse, Grade II listed (NHLE 1050330)	SNC-20	On the southern edge of sub-Site 7C, c.1.9km to the east of Tasburgh	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.103-104, 106
Grove Farmhouse, Grade II listed	SNC-031	On the southern edge of sub-Site 7C, c.1.9km to the	The proposal provides a setback from the assets, with landscape tree	The Applicant notes that the Scheme extends up to the northern boundary of the Grade II Grove Farmhouse (NHLE 1050330). The	Environmental Statement Volume 3 Appendix 10.1 Heritage

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
(NHLE 1050330)		east of Tasburgh	planting comprising native broadleaf woodland and linear tree belts intended to screen the panels and mitigate harm. However, this would create a sense of enclosure to the north, contrasting with the currently relatively open farmed landscape character. While the landscaping measures would be permanent and designed to screen taller 4.5m high solar panels, a preferable approach would be to use natural hedgerow planting with 3m high solar panels, thereby preserving the sense of rural agricultural openness that	present landscape surrounding the heritage asset is not defined by its openness; rather it is bordered by ancient woodlands to the east and west, and further enclosed by mature tall hedgerows and trees across the field boundaries of the surrounding areas. Longer range views of the building are screened by the rising topography to the north, with views of the Listed Building from within Sub-Site 7C highlighting the structure 'nestling' within the surrounding landscape. The roofline of the building is the primary feature in these longer range vistas. The views of the building from within Sub-Site 7C south give a better sense of openness, with views tunnelled between the two areas of ancient woodland. These views south would not be affected by the Scheme. As part of the initial design process, Solar PV Panels have been removed from those areas of Sub-Site 7C to the north of this heritage asset, with the land to	Statement [APP-165], p.103-104, 106

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			currently exists to the north of the assets.	the north and west of Grove Farmhouse to be retained as open agricultural land. This space will be bounded to the north by new native broadleaf woodland and linear tree belts. This substantial set-back from Grove Farmhouse is considered to retain a sufficient buffer of open land to preserve what limited, existing sense of openness can be experienced from these assets, with the proposed woodland and tree belts to the north not considered to impose or dominate this sense of openness. The Applicant disagrees that a revised design scheme is required to minimise impacts to Grove Farmhouse. At present, it is considered that the established setbacks between the heritage asset and the developable area is considered sufficient to ensure that the Solar PV Panels will not be overly prominent within any views from or of the asset. The reduction of Solar PV Panel height to 3m, as well as an associated reduced	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				screening height, would not have any meaningful effect on the sense of openness/enclosure of the surrounding landscape, nor would it allow for a greater ability to understand the setting of Grove Farmhouse.	
Hill House, Grade II listed (NHLE 1050216)	SNC-20 SNC-026 SNC-027	To the south-east of sub-Site 2A, c.2.1km to the north-east of Tivetshall St Margaret	Concerns due to proximity to site and connection of workhouse with surrounding fields.	The Applicant notes that Historic England refers to this asset as Hill House (NHLE 1050216). The Applicant agrees that the Grade II Listed Hill House occupies a prominent frontage on the eastern side of Ipswich Road. The Applicant disagrees that 'The close proximity of the proposed screening would create a sense of enclosure for views from the asset over agricultural land to the west, and also detrimentally affect views of the asset from the west from footpaths BR9 and FP8. Rather than screening the solar farm, the planting would screen the heritage asset from views and restrict views from it. The proposal would result in a moderate adverse level of	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.45-46, 49-50

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				effect and would be considered significant, as it alters the setting of the principal west-facing elevation.' Hill House is set back from Ipswich Road to the west, with its immediate setting including Cherry Lane Garden Centre, which is situated south-east of the building, and associated car parks to the south and south-east of Hill House. Further car parks are present within the grounds of the former workhouse, and modern signage is present to the west, along Ipswich Road. Its wider setting comprises agricultural land. Ipswich Road runs roughly north/south and separates Hill House from the Order Limits to the west. ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] notes that Sub-Site 2A forms part of the rural surrounding of Hill House. The south-eastern part of Sub-Site 2A already possesses a hedgerow of varying maturity, with the hedgerow west of Hill House fairly	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				established, though it is acknowledged that there are gaps in this coverage which allows for intervisibility between Hill House and this field within Sub-Site 2A. Within the field immediately opposite Hill House, a 20m set back has been established along the entire Ipswich Road boundary, with a native broadleaf woodland proposed behind the existing hedgerow. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. It is not considered that the implementation of landscape mitigation within this area will result in the enclosure for views from the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				asset over agricultural land to the west. Hill House is set back c. 25m from Ipswich Road, and this set back will still preserve the sense of openness to the west. The Applicant notes that while Bridleway BR9 extends along the western boundary of Sub-Site 2A, c. 700m west of Hill House, FP8 is situated c. 1.3km south-east of Hill House and is not considered relevant to this assessment. The Applicant is assuming the Consultee means to reference either FP10, which branches off of BR9, west of Sub-Site 2A. ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139] shows the visualisations of the site from the north western corner of the Hill House complex, as well as views towards Hill House from BR9. It is acknowledged that while the presence of Solar PV Panels within Sub-Site 2A will entirely impede any views of the western elevation of Hill House from BR9, these views already	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				exist at quite a distance and are partially screened by the vegetation west of Ipswich Road, as well as along the intervening fields. It is further noted that primary significance of this asset is vested in its architectural and historic interests, largely due to its overall functional, institutional design, as well as its contribution to the social history of the area. While the Scheme will introduce Solar PV Panels within its agricultural setting, these elements will not result in any harm to this significance. The building will still be a prominent building east of Ipswich Road, as well as from FP6 to the north of the former workhouse, and the Scheme will not result in any impact to the ability to appreciate this structure. The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element.	
Hill House, Grade II listed (NHLE 1050216)	SNC-028	To the south-east of sub-Site 2A, c.2.1km to the north-east of Tivetshall St Margaret	More effective mitigation required	The Applicant does not consider that Solar PV Panels need to be removed from the field within Sub-Site 2A immediately west of Hill House, nor does the Applicant consider that the reduction of Solar PV Panels within Sub-Site 2A from 4.5m to 3m in height is required. From BR9, views towards Hill House are at quite a distance, and	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.45-46, 49-50

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				are partially screened by the vegetation west of Ipswich Road, as well as along the intervening fields. ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139] illustrates that the Solar PV Panels within Sub-Site 2A will entirely impede views of Hill House from BR9, and it is not considered that a reduction in panel height will allow for views of Hill House from this location.	
Hill House, Grade II listed (NHLE 1050216)	SNC-029	To the south-east of sub-Site 2A, c.2.1km to the north-east of Tivetshall St Margaret	Overall, the Council considers that, in the absence of the mitigation measures identified and appropriate design controls, the proposal would result in a moderate and therefore significant level of harm to the setting of Hillside House, and this harm must be afforded considerable weight	The Applicant notes that partial visibility of Solar PV arrays in a small section of the Listed Building's setting, at least partially screened by existing hedgerows and trees, would not be such that the significance of the Grade II Listed Hill House would be vitiated, and it is for this reason that the Applicant disagrees with the Consultee's ascription of harm.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.45-46, 49-50

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			in the planning balance in accordance with statutory duties and national policy.		
Hill Cottages, Grade II listed (NHLE 1373062)	SNC-20	c.30m to the east of the northern tip of sub-Site 7D,c.300m to the west of Saxlingham Green	Asset to be impacted by the project during operation	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1 and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 117-118, 121

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				whole, not just to one specific element.	
Hill Cottages, Grade II listed (NHLE 1373062)	SNC-32	c.30m to the east of the northern tip of sub-Site 7D, c.300m to the west of Saxlingham Green	There is an important cluster of historic buildings to the north of the site, including Hill House (1152265) and Hill Cottages (1373062), and Low Farm, which although unlisted, is of some age, appearing on earlier maps and featuring a steep roof that was likely originally thatched. This forms part of a group of historic houses as well as a historic trackway (FP13). The solar panel installations have the potential to be visible when passing through the landscape from the north. It is unclear	The Scheme includes a setback of ~100m from the group of properties on Church Hill. The geophysical survey (ES Volume 3, Appendix 10.3 - Archaeological Geophysical Survey Report [AS-022]) identified numerous linear, rectilinear and curvilinear anomalies possibly representative of a multi-period settlement within the northern part of Sub-Site 7D, immediately south of Church Hill. As such, a setback was established within this part of Sub-Site 7D for the protection of these likely archaeological remains. Within this set back a range of landscape measures are proposed as identified on the Green Infrastructure Strategy [AS-005] . Firstly, the majority of the land is proposed to be converted to a wildflower grassland as a biodiversity net gain benefit. A new hedgerow field boundary / tree belt	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 117-118, 121

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			what the mitigation comprises.	(S7d-4) is proposed to the south of the set back / grassland area which ties up to existing field boundaries to the east. Furthermore, additional tree planting within the road side hedge line is proposed (S7d-7). The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to the implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 of the Draft DCO [AS 032] . The Applicant disagrees with the consultee in that the Scheme would result in low adverse harm and the low end of less than substantial harm to the identified heritage assets. The retention of the northern part of Sub-Site 7D as open fields would maintain the rural setting south of the group of heritage assets along Church Hill. Collectively, the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				mitigation measures would provide visual screening and filtering of views towards the Scheme in a sympathetic way which avoids introducing new dense woodland planting in proximity to the heritage assets and would further retain the sense of openness when travelling along Church Hill between Saxlingham Nethergate and Saxlingham Green Conservation Areas. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including FP13, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant maintains that with the embedded and proposed mitigation measures in	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				place, there will be no harm to the identified heritage assets.	
Low Farm (NDHA)	SNC-32 SNC-20	c.35m to the north of sub-Site 7D, c.250m to the west of Saxlingham Green	There is an important cluster of historic buildings to the north of the site, including Hill House (1152265) and Hill Cottages (1373062), and Low Farm, which although unlisted, is of some age, appearing on earlier maps and featuring a steep roof that was likely originally thatched. This forms part of a group of historic houses as well as a historic trackway (FP13). The solar panel installations have the potential to be visible when passing through the landscape from the north. It is unclear	The Scheme includes a setback of ~100m from the group of properties on Church Hill. The geophysical survey (ES Volume 3, Appendix 10.3 - Archaeological Geophysical Survey Report [AS-022]) identified numerous linear, rectilinear and curvilinear anomalies possibly representative of a multi-period settlement within the northern part of Sub-Site 7D, immediately south of Church Hill. As such, a setback was established within this part of Sub-Site 7D for the protection of these likely archaeological remains. Within this set back a range of landscape measures are proposed as identified on the Green Infrastructure Strategy [AS-005] . Firstly, the majority of the land is proposed to be converted to a wildflower grassland as a biodiversity net gain benefit. A new hedgerow field boundary / tree belt	Not assessed

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			what the mitigation comprises.	(S7d-4) is proposed to the south of the set back / grassland area which ties up to existing field boundaries to the east. Furthermore, additional tree planting within the road side hedge line is proposed (S7d-7). The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to the implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 of the Draft DCO [AS 032] . The Applicant disagrees with the consultee in that the Scheme would result in low adverse harm and the low end of less than substantial harm to the identified heritage assets. The retention of the northern part of Sub-Site 7D as open fields would maintain the rural setting south of the group of heritage assets along Church Hill. Collectively, the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				mitigation measures would provide visual screening and filtering of views towards the Scheme in a sympathetic way which avoids introducing new dense woodland planting in proximity to the heritage assets and would further retain the sense of openness when travelling along Church Hill between Saxlingham Nethergate and Saxlingham Green Conservation Areas. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including FP13, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant maintains that with the embedded and proposed mitigation	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				measures in place, there will be no harm to the identified heritage assets.	
High Green area of the Brooke and Kirstead Conservation Area	SNC-033	Site 9, c.500m to the south of Brooke	Ensure robust mitigation measures	The Applicant is assuming the Consultee is here referring to the Brooke and Kirstead Conservation Area, which lies to the north and east of Sub-Site 9. The significance of the Conservation Area is vested in its preserved historic character as a rural village. The interrelationship between its historic buildings and the development of the village from medieval times onwards is the main contribution to both this asset's significance and setting. Within the conservation area itself, a sense of enclosure is experienced with houses fronting onto the roads lined with mature vegetation, which provides an inward facing atmosphere and strong sense of tranquillity. Tree belts exist along the settlement edges, with views of the countryside from within the village.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 140-141, 146-147

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				itself, and vice versa, very limited. Site 9 is largely screened from the Conservation Area due to the presence of the mature vegetation surrounding much of the village; however, it is acknowledged that views between Site 9 and the cricket club exist, with this complex situated to the south of the main core of the village, beyond the southern treeline. However, this intervisibility is not considered to be a significant viewpoint within the conservation area. The High Green area of the Brooke & Kirstead Conservation Area (at its south-westernmost corner) extends to within c. 130m north of Site 9, at their nearest points. As part of the design process, the south-western approach into the conservation area was considered, as when travelling north into the High Green area, these views could include glimpsed views of the western part of Site within their vistas. As such, Solar PV Panels were entirely removed from the western half of	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Site 9 prior to the submission of the application, with these areas to be retained as agricultural land. The removal of Solar PV Panels from the western half of Site 9 will also help retain the rural backdrop for the westernmost part of the conservation area, with this rural backdrop noted as being an important landscape gap. A 20m wide tree belt is currently proposed (S9-1) as identified on the Green Infrastructure Strategy [AS-005] to the northern boundary of the Site. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. An additional commitment will be added to the Outline LEMP [APP-199] at	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Deadline 1 to increase the planting density at this location recognising the comment from the consultee. Several site visits have been conducted in different seasons and did not identify any intervisibility between Site 9 and the properties on High Green. The majority of Site 9 will be retained as open land and landscape screening along the northern boundary of fields that will not be part of the built parameters of the Scheme could be detrimental by closing off what little views there are of the countryside to the south, which is listed as an important part of the Conservation Area's setting.	
Brooke and Kirstead Conservation Area	BPC-018 BPC-023 CUL-009	Site 9, c.500m to the south of Brooke	Concerns over impact to setting	The Applicant notes that a full assessment of the setting, significance, and potential impacts to the Brooke & Kirstead Conservation Area is provided within ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] . The significance of Brook & Kirstead Conservation Area is vested in its preserved	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 140-141, 146-147

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				historic character as a rural village. The interrelationship between its historic buildings and the development of the village from medieval times onwards is the main contribution to both this assets significance and setting. Within the conservation area itself, a sense of enclosure is experienced with houses fronting onto the roads lined with mature vegetation, which provides an inward facing atmosphere and strong sense of tranquillity. Tree belts exist along the settlement edges, with views of the countryside from within the village itself, and vice versa, very limited. Site 9 is largely screened from the Conservation Area due to the presence of the mature vegetation surrounding much of the village; however, it is acknowledged that views between Site 9 and the cricket club exist, with this complex situated to the south of the main core of the village, beyond the southern treeline. However, this	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				intervisibility is not considered to be a significant viewpoint within the conservation area. The High Green area of the Brooke & Kirstead Conservation Area (at its south-westernmost corner) extends to within c. 130m north of Site 9, at their nearest points. As part of the design process, the south-western approach into the conservation area was considered, as when travelling north into the High Green area, these views could include glimpsed views of the western part of Site within their vistas. As such, Solar PV Panels were entirely removed from the western half of Site 9, with these areas to be retained as agricultural land. Existing field boundaries are to be reinforced with new hedgerows with trees. The removal of Solar PV Panels from the western half of Site 9 will also help retain the rural backdrop for the westernmost part of the conservation area, with this rural backdrop noted as being an important landscape gap. Solar PV	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Panels will solely be positioned within the two fields within the eastern half of Site 9. To help offset any potential glimpsed views from Brooke & Kirstead Conservation Areas a new native linear tree belt will be established immediately south of the trackway which forms the northern boundary of Site 9. In regard to historic landscape character, the existing field boundaries are to be retained and, where necessary, reinforced by additional planting. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing characteristic landscape features. It is considered there will be no impact to the historic field pattern within the area. ES Volume 1, Chapter 14 - Socio-Economics [APP-050] includes an assessment on local tourism assets. It concludes that during the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects. There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be addressed through an agreed compensation arrangement. Effects on Jobs, Employment, and the Supply Chain were identified as positive for a range of effects during all Phases; significantly, these include a Major Beneficial effect on workplace based employment in South Norfolk during Construction and Moderate Beneficial effects on skills in South Norfolk during both	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				the Construction and Operation and Maintenance Phases.	
St Catherine's Church, Grade I Listed (NHLE 1373281)	BEPS-292	c.20m to the south of sub-Site 5B	Concerns over impact to setting	In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 –	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 89-90, 92-93

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Heritage Assessment [APP-165 – 168].	
Clay Cottage	BEPS-292	Location of this asset unknown.	Concerns over impact to setting	The Applicant welcomes further clarity on the location. In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 -	Not assessed.

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168].	
The Street	BEPS-292	Runs through the village of Fritton	Concerns over impact to setting	In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 -	Not assessed specifically. Assessed as part of the conservation area in Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p 92

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168].	
Church of St Michael, Grade I listed (NHLE 1304247)	BEPS-294	c.50m south of sub-Site 4B	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this group of heritage assets. With these areas retained as either open green field or agricultural land. Proposed landscape mitigation, in the form of native broadleaf woodland, will be established c. 420m north of these assets, and any gaps in the existing north/south aligned hedgerow through the southernmost field will be infilled. These mitigation measures will result in no harm to the significance of these heritage assets and, in fact, the new grassland to be established in the field north of the Church is considered to have a positive impact upon the setting of this asset, as it will enhance views south from FP3.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 69-70, 78

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
The Old Rectory, Grade II* listed (NHLE 1304267)	BEPS-294	c.70m south of sub-Site 4B	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this group of heritage assets. With these areas retained as either open green field or agricultural land. Proposed landscape mitigation, in the form of native broadleaf woodland, will be established c. 420m north of these assets, and any gaps in the existing north/south aligned hedgerow through the southernmost field will be infilled. These mitigation measures will result in no harm to the significance of these heritage assets and, in fact, the new grassland to be established in the field north of the Church is considered to have a positive impact upon the setting of this asset, as it will enhance views south from FP3.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.70-71, 78
Roman remains within Site 4	BEPS-294	Site 4	Concerns over impact to setting and interaction between archaeology, setting	Whilst the archaeological remains identified within Site 4 may contribute to the historic interests of the Scheduled Monument, it is	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
			and historic landscape	not considered that they contribute to its setting, nor are they considered to link to any other buildings within Stratton St Michael.	Based Assessment [AS-020] , p. 42-52
Camp in Village, Scheduled Monument (NHLE 1003984)	BEPS-294	c.630m north of sub-Site 4A	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	Impacts to the Scheduled Camp in Village (NHLE 1003984) which is situated north of Sub-Site 4A, were also considered within both ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 to 168] . While it is acknowledged that this Scheduled Monument is situated in a high topographical point in the landscape, suggesting intentional design and siting, due to the evolution of the landscape since the Iron Age/early medieval periods, this monument is no longer a prominent feature within the surrounding environment, and is entirely screened by mature planting.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 67-69, 77-78

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Medieval Remains in sub-Site 5A	BEPS-294	Sub-Site 5	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	The Applicant does not agree with the Consultee that the archaeological remains within Sub-Site 5A contribute to the character and appearance of Fritton Conservation Area, nor the significance of the Grade I Church of St Catherine (NHLE 1373281) and Grade II Listed Church Farm buildings (NHLE 1050259; 1050260), which lie within the northernmost part of the Conservation Area. As noted in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP 172], evidence of medieval period activity has been identified within Sub Site 5A. Their location within the north western corner of Sub-Site 5A is south of an area identified by Norfolk Historic Environment Record as the site of Boyland Deserted Medieval Village (DMV) (HER 10168) and Boyland Hall (HER 39694), as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 –	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-Based Assessment [AS-020], p.62-68

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				AS-021]. Given the date and the position of the medieval remains within Sub-Site 5A, they are likely directly related with the Boyland DMV to the north and do not relate to Fritton Conservation Area, Church of St Catherine or Church Farm.	
Archaeological remains in Site 9	BEPS-296	Site 9	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	The Applicant does not agree that the archaeological remains within Site 9 contribute to the character and appearance of Brooke & Kirstead Conservation Area, nor the significance of the Listed Buildings within its boundaries. As noted in ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] , a probable Late Iron Age ladder settlement has been identified within the north-eastern part of Site 9. In addition, ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] identified that these remains attest to a multi-period occupation activity within this area, spanning the	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-Based Assessment {AS-020} , p. 140-144

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Early-Neolithic – post medieval periods. As noted within the Brooke and Kirstead Conservation Area Character Appraisal (SNC 2025), the character and appearance of the conservation area is largely related to Brooke's medieval/post-medieval linear village development, the former extent of the parkland surrounding Brooke House, as well as the small hamlet of Kirstead and Kirstead Hall grounds. These settlements represent well-defined boundaries, and it is considered that the archaeological remains identified within Site 9 do not contribute to the character and appearance of the conservation area.	
Archaeological remains in Site 10	BEPS-297	Site 10	Concerns over impact to setting and interaction between archaeology, setting and historic landscape	The Applicant agrees that the archaeological works carried out to date within Site 10 have revealed regionally significant remains relating to medieval pottery production, which is also acknowledged in ES Volume 3, Appendix 10.6 – Archaeological	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-Based Assessment [AS-020] , p.152-160

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Mitigation Strategy [APP-173]. Both the Applicant and NCCHES agree that ground-works within these areas are likely to result in a negative impact upon archaeological remains and, in order to off-set this impact, a mitigation scheme will be put into place, likely comprising full-excavation or preservation in-situ. The mitigation works will only be determined once the Scheme design within Site 10 is determined and, as outlined with the present Archaeological Mitigation Strategy, a detailed Project Design will be supplied to NCCHES for the works. The Applicant does not agree with the Consultee that the archaeological remains within Site 10 contribute to the character and appearance of Seething Conservation Area, nor the significance of the Grade I Listed Ditchingham Hall (NHLE 1153041), nor its Grade II Registered Park & Garden (NHLE 1000225). As noted within the Seething Conservation	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Area Character Appraisal (SNC 2019), the character and appearance of the conservation area is largely related to Seething's medieval/post-medieval linear village development. This settlement, which lies c. 940m north-east of Sub-Site 10E, is of a well-defined boundary, and it is considered that the archaeological remains identified within Site 10 do not contribute to the character and appearance of the conservation area. Likewise, the Grade I Listed Ditchingham Hall, which is situated within a Grade II Registered Park and Garden, is situated 1.6km south-east of Sub-Site 10B. This heritage asset is also considered to be of a well-defined extent and does not draw any significance from the archaeological remains identified within Site 10.	
A Grade II listed building	CJC-002	Unknown location provided by the respondent	Effects of vibration from lorries	The Applicant notes the concern raised regarding potential vibration effects on the Grade II listed property from construction vehicle	Environmental Statement Volume 3 Appendix 10.1 Heritage

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				movements. An assessment of construction noise and vibration, including vibration from construction traffic, is presented in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. An assessment of effects on heritage assets, including listed buildings, 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]. Construction vehicle routing has been developed in consultation with Norfolk County Council as the Local Highway Authority, with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable, as set out in the Outline CTMP [APP 201]. Mitigation measures to control noise and vibration during construction are set out in the Outline CEMP [APP-196], with contractors required to ensure that works are carried out in accordance with best practicable	Statement {APP-165}, p. 161-162

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				means as stipulated in the Control of Pollution Act. Detailed CEMP and CTMP will be submitted to and approved by the relevant planning authority in accordance with Requirements 13 and 15 of the Draft DCO [AS-032] , with the CTMP requiring consultation with the relevant highway authority.	
Saxlingham Nethergate Conservation Area and listed building therein	CJC-006	Saxlingham Nethergate	Concerns over lorries driving through the village and their effects on LBs and conservation area	In respect of Saxlingham Nethergate, The Street will not be used for general construction traffic. The only construction traffic expected in Saxlingham Nethergate will be for the movement of Abnormal Indivisible Loads (AIL). For AIL movements within Norfolk (and Suffolk) there is an existing highway authority embargo against AIL movements during peak traffic times. These restricted times are Monday to Friday 07:00 to 09:00 and 16:00 to 18:00. It is anticipated that the AIL movements would take place during the weekend and during daylight hours to enhance visibility, in accordance with the AIL	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 161-162

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				management measures set out in the Outline CTMP [APP-201]. These commitments will be secured through the detailed CTMP, to be submitted to and approved by the relevant planning authority in accordance with Requirement 15 of the Draft DCO [AS-032]. Each AIL movement will be carefully planned and timed to reduce disruption and undertaken under licence with the Highway Authority to ensure safe operation and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The movements will be undertaken using strict traffic management, and notification of these types of movements will be communicated in advance. Requirements for AIL will be determined through the detailed design process and in consultation with statutory consultees. As part of the management of AIL, the selected haulier must notify the police,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				highway authorities and bridge owners when planning to transport AILs. It is likely that AIL deliveries will require police escorts and/or temporary road closures or diversions on the day of the delivery to maintain the safety of members of the public. An assessment of effects on heritage assets, including listed buildings, war memorials and conservation areas within Saxlingham Nethergate, 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]. Construction vehicle routes have been selected with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable. However, it is acknowledged that AIL will pass through Conservation Areas. Mitigation measures relating to construction traffic and AIL are set out in the Outline CTMP [APP	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				201]. In accordance with Requirement 15 of the Draft DCO [AS-032] a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority. The Applicant can confirm that no part of the registered title of either the Saxlingham Nethergate War Memorial or The Old Rectory falls within the Order Limits. Accordingly, no powers of compulsory acquisition or acquisition of rights are sought over either property and neither title is within the scope of the proposed development works. As set out in the Land Plan [APP-006] page 5 (sheet 3) and the Book of Reference [APP-022] the only land plots in this location for which rights are sought are Plots 03-001 and 03-002. Both plots are located wholly within adopted highway land. No rights are sought over land outside the adopted highway, including any land	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				forming part of the curtilage of the War Memorial or The Old Rectory, for Abnormal Indivisible Load (AIL) movements or any other purpose. Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the Outline CTMP [APP-201] to ensure the protection of nearby assets, including the War Memorial and The Old Rectory.	
Listed buildings close to BESS	SW-007	Station Road, Tivetshall	Concerns on impact to setting	The landscape and visual effects of the Scheme have been assessed in detail within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] , with supporting assessments provided in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148] and Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149] . Appendix 7.8 includes a Residential Visual Amenity Assessment for residential	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 161-162

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				properties located within 100m of Scheme elements parameters. The properties referred to in your representation are not located within 100m of the relevant Scheme elements parameters and therefore do not fall within the scope of that assessment. It is possible that the distances quoted relate to the Order Limits rather than to the substation parameter itself. The wider Landscape and Visual Impact Assessment also considers visual effects. Representative view location BESS/VL9 is located adjacent to the group of properties on Station Road referenced in the comments and was selected to represent views experienced from this location. The assessment concluded that the visual effects at this location would be Major/Substantial (Significant) during the construction phase and Major (Significant) during the first year of operation. These effects are predicted to reduce over time	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				as the proposed landscape mitigation becomes established, resulting in a Moderate (Significant) effect by Year 15 of operation. Detail assessment discussion is in ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]. 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. Around the BESS and the 400kV sub-station, linear tree belt is proposed. 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]	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. With regard to the co-location of the 400kV Project Substation within the BESS Site, the Site Selection Assessment [APP-215] explains that the criteria required for a new National Grid Substation, i.e. accessibility from the SRN etc, were also important considerations for the location of the BESS, and that identifying a location for the BESS that was proximate to the National Grid Substation would be preferable from an access perspective, and in limiting the extent of grid connection infrastructure across the Scheme. Locating the BESS in proximity to the National Grid Substation has the benefit of minimising transmission losses, maximising storage efficiency, providing effective grid balancing and supporting a faster and more reliable reaction to power outages and disruptions. It also brings together some of the taller	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				infrastructure of the Scheme with the overhead lines, minimising the spatial distribution of these taller elements as far as practicable across the greater geographical area of the Site. The BESS Site was selected on the basis of its proximity to the PoC and access from Station Road, and with consideration of minimising landscape and visual, heritage and noise impacts from the BESS as far as practicable. The BESS would be located, at the closest point, approximately 200m from the closest residential property, 470m from the closest listed building and 50m from the closest PRow. As set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], setbacks and buffer zones were introduced along parts of the western and southern boundary of the BESS Site to allow for potential landscape screening of nearby residential properties, and the BESS area was setback further in	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				the north east of the BESS Site to provide a minimum buffer of 200m to the nearest residential property owing to fire safety best practice and in consideration of noise impacts. For the 400kV Project Substations, the Design Principles, Parameters and Commitments [APP-213] secure a minimum offset distance of 50m from the curtilage of residential properties (assessed on a case-by-case basis for individual residential properties).	
Little Moulton archaeology	GMAG-265 GMAG-266	Site 1 and BESS	Concerns that this has not been discussed	The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [AS-020 – AS-021] , and includes the area of the former hamlet of Little Moulton. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-Based Assessment [AS-020], p.12-20

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				useful in identifying the principal concentrations of archaeology, and there is no reason to believe this is not the case. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [AS-020 – AS-021], within section 4 of this assessment including discussion of the former All Saints Church and area of Little Moulton.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Walsingham pilgrimage	GMEC-015	Norfolk	Concerns over loss of heritage and pilgrimage identity	The Applicant notes that an archaeological and historical background of the area has been provided in ES Volume 3, Appendix 10.2 - Archaeological Desk-Based Assessment [AS 020 – AS-021] . Historically, pilgrims would have traversed the landscape to religious sites across the country, and it is possible that early pilgrimage routes may have passed through the area. However, such pilgrimages were suppressed during the Reformation and the Walsingham Pilgrimage was only revived in the early-20th century. Modern established pilgrimage routes do not pass through or near Great Moulton, including the London –Walsingham route, the Norwich – Walsingham route, and the King's Lynn – Walsingham route.	Environmental Statement Volume 3 Appendix 10.2 Archaeological Desk-Based Assessment [AS-020]
Seething Conservation Area	SAG-022	Seething	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed	Environmental Statement Volume 3 Appendix 10.1 Heritage

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.	Statement [APA-165] , p.36, 151
Brooke Conservation Area	SAG-022	Brooke	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 140-141, 146-147

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				that there would be no impact to their character and appearance by the Scheme.	
Saxlingham Green Conservation Area	SAG-022 SNPC-107 SNPC-29 CUL-009	Saxlingham Green	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme. The Applicant's 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. It has informed the iterative design	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 114-115, 120

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				process and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst this would result in moderate adverse effects in the long term which are reversible as reported in ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120], and ES Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The assessment of potential impacts to Saxlingham Nethergate, Saxlingham Green, Listed Buildings, and Conservation Areas have been provided within ES Volume 3, Appendix 10.1 – Heritage Statement Part 1 [APP-165 – APP-168] and ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], both of which have been undertaken in accordance with appropriate guidelines. In regard to Saxlingham Green and the Listed Buildings within, setbacks have been established within the northern parts of Sub Sites 7D and 7F, the areas of the Scheme which extend closest to the southern boundary of Saxlingham Green Conservation Area. Within the northernmost part of Sub Site 7D and eastern part of Sub-Site 7F, Solar PV Panels have	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				been removed from those fields which are situated adjacent the eastern and western approaches into the conservation area, with these areas to be retained as grassland. Several linear belts of broadleaf woodland will also be established within the northern parts of Sub-Site 7D and 7F, continuations of established woodland already present within the landscape south of Saxlingham Green. The significance of Saxlingham Green derives primarily from its preserved historic settlement layout, with the surrounding vegetation helping to enclose the village from views across the surrounding rural landscape. While there are a few gaps in the surrounding vegetation, these will be mitigated by proposed landscaping within Sub-Site 7D and 7F. These landscaping initiatives will ensure that the Scheme does not encroach upon Saxlingham Green. It is noted that	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				ALL routes may potentially be required within the boundaries of both Saxlingham Nethergate Conservation Area and Saxlingham Green Conservation Area; however, any movements within each of these conservation area boundaries would be limited during the construction phase to ensure any impacts are kept to a minimum. These works are detailed within ES Volume 1, Chapter 11 – Transport and Access [APP-047] will be managed by the Outline CTMP [APP-201]. No potential 'strikes or swipes' have been identified with heritage assets within either conservation area, and there are no concerns regarding vibrations and heritage assets. It is considered that due to the temporary nature of these works, there will be no harm to the character or appearance of the conservation areas.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Fritton Conservation Area	SAG-022 CUL-009	Fritton	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p.88-89, 92
Hempnall Conservation Area	SAG-022 CUL-009	Hempnall	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p.87-88

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.	
Shotesham Conservation Area	SAG-022 CUL-009	Shotesham	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 36, 132
Wacton Conservation Area	SAG-022	Wacton	Concerns over impact on conservation area	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] ,	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p.36

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.	
Wood Green hamlet and listed buildings	WGRG-019	Wood Green	Concerns over impact on hamlet and listed buildings	The Applicant notes that the hamlet of Wood Green lies c. 300m south and c. 260m east of the Cable Route Corridor. As noted within ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 - APP-168], only designated heritage assets within a certain distance of the Cable Route Corridor were included for assessment, due to the scale of potential effects arising from construction and decommissioning activities within the Cable Route Corridor which, by their nature, will result in a minimal impact to built-heritage assets during the	Not assessed

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				construction phase, and will be inherently temporary and short term. The Applicant notes that all five Grade II Listed Buildings within the hamlet of Wood Green were not included for assessment due to their distance from the Cable Route Corridor and nature of the proposals within the area.	
War Memorial, Grade II listed (NHLE 1448984) and Old Rectory, Grade II* listed (NHLE 1050667)	SNPC-001 CUL-010	Saxlingham Nethergate	Concerns over impact to setting	The Applicant notes the concerns raised by Saxlingham Nethergate Parish Council regarding parts of the curtilages of the Saxlingham Nethergate War Memorial and The Old Rectory, Saxlingham Nethergate. The Applicant can confirm that no part of the registered title of either the Saxlingham Nethergate War Memorial or The Old Rectory falls within the Order Limits. Accordingly, no powers of compulsory acquisition or acquisition of rights are sought over either property and neither title are within the scope of the Scheme. As set out in the Land	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 114-115, 162

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Plan [APP-006] page 5 (sheet 3) and the Book of Reference [APP-022] the only land plots in this location for which rights are sought are Plots 03-001 and 03-002. Both plots are located wholly within adopted highway land. No rights are sought over land outside the adopted highway, including any land forming part of the curtilage of the War Memorial or The Old Rectory, for AIL movements or any other purpose. Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with a detailed CTMP, which must be approved by the relevant planning authority in consultation with the relevant highway authority and substantially in accordance with the Outline CTMP [APP-201], to ensure the protection of nearby assets, including the War Memorial and The Old Rectory.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Listed buildings (all Grade II) close to Site 7 – Hill Farmhouse (NHLE 1050016), Barn immediately east of Trap's Hall (NHLE 1050048), Tramp's Hall (NHLE 1302215), Former Quaker Meeting House (NHLE 1178892), The Countryman Public House (NHLE 1373407), Wood Farmhouse (NHLE 1373238),	SNPC-32	Site 7	Construction methodology that does not harm heritage	The Applicant refers the respondent to the Site Selection Assessment [APP-215] , Design Approach Document [APP-212] , Statement of Need [APP-206] and Planning Statement [APP-209] , which together set out the evidence base for the inclusion of Site 7 within the Order Limits. The likely significant effects have been assessed within the ES [APP-036 to APP-195] , with mitigation secured through the outline management plans [APP-196 to APP-205] and Schedule 2 Requirements of the Draft DCO [AS-032] .	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 97-106, 113-121, 127-130

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Grove Farmhouse (NHLE 1050330), Saxlingham Green Conservation Area, Manor Cottage (NHLE 1373079, Manor Farmhouse Barn (NHLE 1152344), Manor Farmhouse (NHLE 1050675), Hill Cottages (1373062), Hill House (NHLE 1152265), Oaks Farmhouse, Grade II* listed (NHLE 1170906)					

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Shotesham Conservation Area and Upgate Farm, Grade II listed (NHLE 1050681)	SPC-032 SPC-109 SPC-110 SPC-112 SPC-113 SPC-114 SPC-115	Sites 8A and 8B	Concerns over impact to setting on these assets and wider landscape	The Applicant notes these comments, and the points raised in SPC-032 regarding cultural heritage have been addressed in detail in SPC-109 - SPC-118. The Applicants 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 it has informed the iterative design process with the aim to reduce adverse effects. At Site 8B solar development has been excluded on rising landform to the north and west to reduce visibility of the Scheme from Shotesham to the north. As identified on Figure 7.5.4 Zone of Theoretical Visibility for Site 8, theoretical visibility from Shotesham and Shotesham All Saints is restricted by a combination of the Scheme design and parameters and existing landform and existing vegetation. In addition, as identified on the Green Infrastructure Strategy	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 132-136

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				[AS-005] landscape measures have been proposed to reinforce existing tree features on existing filed boundaries, which seeks to retain and enhance existing vegetation and respond to the prevailing character as far as practicable and screen the remaining part of the Site 8B which is proposed for solar development. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS 021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS 022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]. The Applicant considers that these assessments have been undertaken in accordance with the appropriate legislation, policies and guidance.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				These assessments together present a detailed assessment of the known and potential archaeology within the Site and has assessed the potential impact of the Scheme on archaeological assets and, where required, appropriate mitigation has been secured in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. The assessment concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and all residual adverse effects equate to 'less than substantial harm' in terms of the NPSs EN-1 and EN-3, and a 'low level of harm' in NPPF (August 2026) terms. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is also supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. The Applicant considers that these assessments have been undertaken in accordance with the	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				appropriate legislation and policies including those outlined by the Consultee in 9.2. This assessment presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein, and has assessed the contribution of the Site to built heritage assets in the surrounding area, along with potential impacts of the Scheme upon the historic environment. The Applicant disagrees with the Consultee's statement, in that 'the proposal would cause harm to designated heritage assets that has not been avoided or justified'. As noted within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], the design of the Scheme has taken cultural heritage receptors into account, with the Outline OEMP [APP 196] providing additional details of specific mitigation and enhancement measures. These measures have been established to minimise potentially adverse	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				effects upon the significance of built-heritage assets (including the siting of transportation routes, temporary Construction Compounds, substations and BESS to be unobstructive to the settings of heritage assets, gapping up and reinforcing hedgerows and planting of tree belts, and incorporating setbacks). In ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056], no significant residual effects upon cultural heritage assets are predicted during the Construction, Operation & Maintenance, or Decommissioning Phases of the Scheme. The Applicant notes that Site 8 form parts of the wider agricultural landscape of Shotesham Conservation Area; however, as the conservation area lies c. 650m north of Sub-Site 8B, it is not considered to contribute to its immediate setting. As noted within ES Volume 3, Appendix 10.2 –	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Archaeological Desk-Based Assessment [AS-020 – AS-021], the landscape around Shotesham has retained remnants of an earlier medieval and post medieval agricultural landscape, largely in the forms of sinuous boundaries; however, there has been considerable loss of field boundaries within the wider landscape since the late-19th century, though these now larger fields do retain the characteristic medieval/post-medieval sinuous boundaries. Within Site 8 itself, it is noted that the majority of the fields have been classified as 20th century agricultural fields, which hold little historic significance. Small areas within Site are further classified as remnant 18th-19th century field pattern, which is of greater historic interest; however, Solar PV Panels have been removed from two of the three fields identified as remnant 18th-19th field pattern, with a significant amount of the remaining field within	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Sub-Site 8A also classified as a development exclusion area. Although there will be temporary change from arable use to energy generation, this will be reversible and temporary in nature. Furthermore, there will be no impact from this change of use on the legibility of the field patterns, nor the historic landscape character of the area as a whole. While it is accepted that footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths within or surrounding Site 8 which have any particular heritage value of equivalence to a non-designated heritage assets. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				The Applicant notes that Site 8 forms part of the wider agricultural landscape of Shotesham Conservation Area; however, as the conservation area lies c. 650m north of Sub-Site 8B, it is not considered to contribute to its immediate setting. The Applicant notes that the Shotesham Conservation Area Character Appraisal and Management Guidelines (SNC 2018) make limited references to the surrounding countryside, including 'Norwich Road, divides the landscape into two distinct parts. To the east is mainly open country, with fine views over the Shotesham valley; the west is Shotesham Park, an open parkland dotted with trees, enclosed with dense belts of woodland and centred on the great house itself.' While Site 8 forms part of the wider countryside, the document makes no specific reference to the area of Site 8, which lies to the south/south-east of Shotesham Conservation Area.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				The Conservation Area Character Appraisal and Management Guidelines identifies a series of 'key views' both too and from the conservation area (SNC 2018, 24); however, none of these key views include Site 8 within their vistas, and it is considered that the Scheme would not have any impact upon the identified views. The Applicant has noted Figure 9.3b-d as provided by the Consultee, which show the covers of the Shotesham Wildlife Survey and Shotesham Circular Walks, as well as an image of the Shotesham Village website.² A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148].	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				The Applicant notes that the Shotesham Conservation Area Character Appraisal and Management Guidelines (SNC 2018) make limited references to the surrounding countryside, including 'Norwich Road, divides the landscape into two distinct parts. To the east is mainly open country, with fine views over the Shotesham valley; the west is Shotesham Park, an open parkland dotted with trees, enclosed with dense belts of woodland and centred on the great house itself.' While Site 8 forms part of the wider countryside, the document makes no specific reference to the area of Site 8, which lies to the south/south-east of Shotesham Conservation Area. The Conservation Area Character Appraisal and Management Guidelines also identifies a series of 'key views' both too and from the conservation area (SNC 2018, 24); however, none of these key views include Site 8 within their vistas.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential direct impacts to historic landscape character. The historic landscape character within the majority of Site 8 have been classified as 20th century agricultural fields, which hold little significance. One field within Sub-Site 8B and two fields within Sub-Site 8A appear to be remnants of 18th-19th century field pattern, which is of greater interest. Historic landscape character has also been addressed within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The Applicant recognises that the Scheme would result in an effects on the local landscape character of Site 8. These effects are clearly identified within the LVIA and are assessed as Major Adverse and Significant during construction, decommissioning and in operation Year 1. As proposed landscape mitigation establishes and matures, including hedgerow reinforcement	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				and new tree and woodland planting secured through the Green Infrastructure Strategy [AS-005], the magnitude of effect reduces over time. By Operational Year 15, effects on the local landscape character are assessed as Moderate Adverse and Significant. The Applicant has reduced solar development in Sub-Site 8B, to reduce the impact on landscape setting on cultural heritage asset, as documented in ES Volume1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041]. The Applicant notes that potential impacts to the Grade II Listed Upgate Green Farmhouse (NHLE 1050681) and Outhouse Immediately to North of Upgate Green Farmhouse (NHLE 1304804) have been assessed in ES Volume 1, Chapter 10 – Cultural Heritage [APP 046], which supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP 165 – APP-168].	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				As part of development of the Scheme, Solar PV Panels were removed from northernmost field of Sub-Site 8B. The existing substantial hedgerows along the southern part of this field will be enhanced under the landscape proposals of the Scheme to offer further screening. The assessments have acknowledged that the wider agricultural setting of the Farmhouse highlights its rural nature and intentional design; however, with the proposed mitigation, the assessment has concluded that overall significance of this designated heritage asset will not be harmed by the Scheme. No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				identified. It should be noted that apart from a footpath near Shotesham House, east of The Street, no reference is made within the Conservation Area Character Appraisal and Management Guidelines regarding historic lanes or public rights of way within the conservation area or the wider landscape. The Applicant does not agree with the Consultee, that the archaeological remains within Site 8 contribute to the character and appearance of Shotesham Conservation Area. Both ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] and ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] identified the low – moderate potential for archaeological remains dating to the prehistoric – medieval periods within Site 8. Further works, in the form of evaluation trenching, as documented within ES Volume 3,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Appendix 10.5 – Evaluation Trenching Report [APP-172], did not identify any significant remains within the study site, with the works revealing postmedieval remains relating to field systems which were removed by 1988 (e.g. field boundaries and ditches). No evidence of prehistoric or Romano-British co-axial field systems have been identified within Site 8. While it is acknowledged that the Scheme will result in a change from arable use to energy generation, this will be reversible and temporary in nature. Furthermore, there will be no impact from this change of use on the legibility of the field patterns, nor the historic landscape character of the area as a whole. The Applicant acknowledges that the Scheme would introduce some change to the landscape character and views. However, the historic landscape character within the majority of Site 8 have been classified as 20th century agricultural fields, which hold little	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				significance. One field within Sub-Site 8B and two fields within Sub-Site 8A appear to be remnants of 18th-19th century field pattern, which is of greater interest. The Applicant has reduced solar development in Sub-Site 8B, to reduce the impact on landscape setting on cultural heritage asset, No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Finally, the archaeological works to date have not identified any significant archaeological remains within Site 8, with the only identified assets being related to post medieval field systems, which were removed by the late-20th century. While it is acknowledged that the Scheme will result in a change from arable use to energy generation, this will be reversible and temporary in nature. Furthermore, there will be no impact from this change of use on the legibility of the field patterns,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				nor the historic landscape character of the area as a whole. The Applicant notes that the works detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] has primarily targeted areas where the geophysical survey (as presented in ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey Report [AS-022]) has identified archaeological potential, in addition to anomalies identified through aerial photography (as presented in ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 and AS-024]), as well as existing entries on the Historic Environment Record, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 and AS 021]. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is,	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				however, very useful in identify the principal concentrations of archaeology, and there is no reason to believe this is not the case. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NHES that the amount and location of any additional trenching will be targeted on areas of higher impact, and will be proportionate to the cumulative impact of all elements of the scheme. In areas of known extensive impacts (e.g. BESS, Substation, working compounds), they will be subject to informative trenching at 3.5% by area. Within areas of known archaeological sensitivity, as identified thus far in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP 173], mitigation will be carried out, the extent and form	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				of which will be balanced against the impact of the finalised detailed development plans. Detailed Project Designs will be supplied to NCCHES prior to approval for each stage of archaeological mitigation, once the full development plans are known.	
Shotesham and Saxlingham roads and field system	SPC-111	Site 8	Concerns over impact to framework of roads and fields	No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant refers to its response to SPC 110 regarding historic landscape. Comments regarding historic landscape have been addressed in the Applicant's response to SPC-110.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 132-136, 114-115, 120, 162
Tivetshalls and Church of St Margaret,	TPC-002	Tivetshall St Margaret,	Linear parish with 34 listed buildings	The Applicant agrees with this statement.	Environmental Statement Volume 3

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Grade I listed (NHLE 1373033)		Tivetshall St Mary			Appendix 10.1 Heritage Statement [APP-165]
Fritton and Hempnall villages	LAN-023	Fritton, Hempnall	Both are mentioned in the Domesday Book and concerns over impact	As described in the Design Approach Document [APP-212] , heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. The Applicant 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. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206] . The Applicant notes	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.57, 88 Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020], p. 33, 66

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				that potential impacts to Fritton and Hempnall have been addressed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 and AS 021] .	
Long Stratton Conservation Area	ARB-024	Long Stratton	Concerns over impact on Conservation Area and landscape	The Applicant notes that an assessment of historic landscape and heritage assets (including Conservation Areas and Listed Buildings) has been provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP 046] , which is supported by ES Volume 3, Appendix 10.1 - Heritage Statement [APP 165 to APP-168] . Potential impacts to Long Stratton Conservation Area were considered as part of these assessments, which concluded that the Scheme would not result in any impacts to the heritage assets of	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 66-67, 77

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Long Stratton. Construction vehicle routes have been selected with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable. However, it is acknowledged that AIL will pass through Conservation Areas. Mitigation measures relating to construction traffic is set out in the Outline CTMP [APP 201] . In accordance with Requirement 15 of the Draft DCO [AS-032] a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.	
Roman Pye Road	CUL-001 CUL-029	Long Stratton	Concerns over impact on Roman Road, Boudicca Way	An assessment of heritage assets, including Conservation Areas and listed buildings, 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] . As described in the Design Approach Document [APP-212] , heritage assets have	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020] , p. 89

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example, reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. During the design process, regard has been had to Boudicca Way during the construction traffic routing, the siting of infrastructure within the Scheme and the Green Infrastructure Strategy [AS-005] to minimise impacts as far as possible. An assessment of Boudicca Way from a visual amenity perspective is provided in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. Construction vehicles in respect of Boudicca Way will be managed through the Outline PRow PPMP [APP-203], which sets out anticipated closures and management of PRow. A detailed PRow PPMP will be submitted to and approved by the relevant planning authority in accordance	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				with Requirement 17 of the Draft DCO [AS-032]. The Roman Pye Road bisects Site 4. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP 173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCC HES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. The alignment of Pye Road broadly follows the route of the present Norwich Road, which passes between Sub-Sites 4A and 4B. Potential areas of archaeological interest ranging from the prehistoric – Medieval periods were identified within Site 4 along the length of this road, as detailed within both ES Volume 3, Appendix 10.3 –	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Archaeological Geophysical Survey [AS-022] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP 173], further stages of archaeological works will be undertaken within the of the Scheme. It has been agreed with NCCHEs that the amount and location of any additional works will be targeted on areas of higher impact, and will be proportionate to the cumulative impact of all elements of the Scheme. The AMS [APP-173] notes the archaeological remains identified thus far within Site 4 will be subject to further archaeological mitigation, should the future design plans dictate the need.	
Listed Buildings	CUL-002 CUL-015	Within Scheme	Concerns listed buildings have not been assessed	An assessment on listed buildings, is provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Statement [APP-165 to APP-168]. The study area extends to 5km from the Sites for the highest-grade heritage assets (i.e. World Heritage Sites, Scheduled Monuments, Grade I and Grade II* Listed Buildings). A study area of 2km has been adopted for the remaining designated heritage assets (i.e. Grade II Listed Buildings and Conservation Areas) and 1km for non-designated heritage assets and HER entries. These study areas were determined based on professional judgement and were presented to all statutory consultees at PEIR stage. As noted within the Consultation Report [APP-024], in Historic England's PEIR Response from August 2025, it is noted that they 'broadly agree with the scope and methodology of the cultural heritage and archaeology assessments' as presented at PEIR stage, and further agree 'with the proposed extents of the study areas for different heritage assets and	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				welcome the flexible approach based on the Zone of Theoretical Visibility and ground-truthed walkover surveys.' As described in the Design Approach Document [APP-212] , heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets.	
Church of St Michael, Stratton St Michael, Grade I listed (NHLE 1304267) and its environs	CUL-003	Stratton St Michael	Concerns over impact	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 – APP-168] . It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p.66-80

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				be improved by proposed mitigation measures. The Applicant notes the Consultee'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 areas 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 and Site 4 and the Cable Route Corridor, the extent of which includes a large roundabout to the north of the village.	
Church of St Mary, Grade I listed (NHLE 1304232)	CUL-003	Long Stratton	Concerns over impact	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	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.66-80

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Volume 3, Appendix 10.1 – Heritage Statement [APP 165 – APP-168]. It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will be improved by proposed mitigation measures. The Applicant notes the Consultee'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 areas 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 and Site 4 and the Cable Route Corridor, the extent of which	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				includes a large roundabout to the north of the village.	
Church of St Catherine, Grade I listed (NHLE 1373281)	CUL-003	Fritton	Concerns over impact	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 – APP-168] . It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will be improved by proposed mitigation measures.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p.89-90, 92-93
All Saint's Church, Wacton, Grade I Listed (NHLE 1372999)	CUL-003	Wacton	Concerns over impact	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 –	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p 21

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				APP-168]. It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will be improved by proposed mitigation measures.	
Church of St Margaret, Hempnall, Grade I listed (NHLE 1050328) and its wider landscape	CUL-003 CUL-004	Hempnall	Concerns over impact	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 – APP-168]. It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will be improved by proposed mitigation measures. The Applicant notes that ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p 21

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS 023 - AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP 172]. The Applicant considers that these assessments have been produced in line with the relevant legislation, planning policy and professional guidelines, and are considered to be robust and appropriate for the assessment of the Scheme. It was determined as part of the assessment that the Scheme would result in no impact to the Grade I Listed Church of St Margaret (NHLE 1050328) in Hempnall. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Strategy [APP 173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. 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. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206] and ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				direct impacts to historic landscape character.	
Ancient and historic field patterns	CUL-005	Whole Scheme	Concerns of destruction of historic field pattern	The Applicant acknowledges the concern over landscape and visual effects as a result of the Scheme. ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] presents an assessment of the likely effects of the Scheme and includes considerations of the worst-case scheme parameters. Existing field boundaries are to be largely retained and, where necessary, reinforced by additional planting. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] (which is a secured document) have been carefully sited with regard to existing characteristic landscape features. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential direct impacts to historic landscape character.	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				The majority of fields within the Order Limits are classified as '20th century agricultural fields', which represent large fields established as a result of significant boundary removal following World War II. Such fields are considered to be of little significance, as their earlier historic character has already been altered as a result of the boundary removal. It is considered that the temporary change of use from agricultural to energy production will have no impact upon the legibility of the present established field patterns, nor the historic landscape character of the area as a whole.	
Risk to archaeological sites and undiscovered remains	CUL-006	Whole Scheme	Concerns over risk to archaeological sites and undiscovered remains	The archaeological potential has been established through records, aerial mapping, geophysical surveys and targeted trial trenching, with the potential effects of the Scheme reported in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]. In consultation with NCC	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Archaeological Advisor, an Archaeological Mitigation Strategy has been developed, as set out in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP 173] which sets out details of the overarching methodology for undertaking a programme of mitigation. Requirement 12 of the Draft DCO [AS-032] requires written scheme of investigation to be submitted and approved with the relevant planning authority.	
Impact on lanes and tracks	CUL-007	Whole Scheme	Concerns over impact on roads and tracks	The characteristics of the local road network have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP 047] and have informed the development of the access strategy. The Outline CTMP [APP-201] includes a range of management measures, including designated routes, vehicle booking systems and traffic management measures, to minimise impacts on the Local Highway Network. While	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage assets. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified.	
Sites 1 and 2	CUL-008	Sites 1 and 2, Great and Little Moulton	Concerns over archaeological baseline	The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [AS-020 – AS-021] . The Applicant notes that extracts from the Moulton St Michael Enclosure and Tithe Maps as well as the Tivetshall St Margaret Enclosure and Tithe Maps and Stratton St Mary Tithe Map (which	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [AS-020]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				cover Site 1 and Site 2 have been included as Figures 3-7 within ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [AS-020 – AS-021]. The Applicant notes any potential limitations to the geophysical survey have been acknowledged within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very useful in identifying the principal concentrations of archaeology, and there is no reason to believe the interpretation and reporting provided within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS 022] is limited or inaccurate. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP 173], further stages	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. The Applicant further notes that the possible site of All Saints Church, as identified within Sub-Site 1B by the HER and detailed in ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], as well as the results of the geophysical survey (ES Chapter 3, Appendix 10.3 – Archaeological Geophysical Survey [APP 022]), was identified during the course of the assessment, with this area subject to targeted trial trenching, as detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-173]. The	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				evaluation within this area identified no evidence of a medieval Church, with the only features revealed relating to elements of a long-lie field system with likely origins in the medieval period and continued use and reorganization into the post-medieval era.	
Church Farm, Grade II listed (NHLE 1050259) and Fritton Conservation Area	CUL-011	Fritton	Concerns over location of substation	The Applicant has sought to reduce adverse effects on these receptors and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. At Site 5 the 400kV Project Substation has been sensitively sited centrally within the development area maximising the screening benefits of existing vegetation and maximising the setbacks from a number of receptors including local PRow, residential properties and heritage receptors. Collectively	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p. 87-93

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. Furthermore, the Green Infrastructure Strategy [AS-005] seeks to retain and enhance existing vegetation, to aid the integration of the Scheme and Substation within the environment. A combination of new hedgerow with trees, tree planting and hedgerow improvements are proposed to respond to existing characteristic features and aid visual screening of the Scheme; whilst supporting biodiversity and green infrastructure connectivity. The Applicant notes that assessments of potential impacts to Fritton Conservation Area and the Grade II Listed Buildings at Church Farm have been provided within ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]. The assessment has concluded that based on the existing environmental baseline, as well as the proposed landscape	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				mitigation, the Scheme will cause no harm to these heritage assets.	
Listed buildings	CUL-012	Whole Scheme	Concerns over vibration-related and structural harm to listed buildings	The Applicant notes that traffic surveys recorded existing movements by HGVs on the Local Road Network within the Study Area, as detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Potential impacts to heritage assets from the vibration of traffic were scoped out (see ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. The effects of vibration from the construction of the Scheme (excluding the CRC) are considered within ES Volume 1, Chapter 12 - Noise and Vibration [APP 048] for receptors up to a distance of 100m from vibration-generating construction activity. Vibration effects from the CRC are scoped out of these assessments. It was concluded that there is no potential for any swipes or strikes to heritage assets within the Order Limits, nor is it considered that	Not assessed in heritage report

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				there will be any direct impacts upon heritage assets by vibration.	
Old Rectory, Grade II* listed (NHLE 1050320)	CUL-013	Great Moulton	Concern over impact	The Grade II* Listed Old Rectory (NHLE 1050320) in Great Moulton is situated c. 1.1km north of the Order Limits, north of Carr Lane. As noted within ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168] , due to the distance between these two areas, as well as the intervening built-environment of Great Moulton, this asset was scoped out of further assessment as it was considered that the Scheme would not results in any impact to the significance of this asset.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 21
Site 7 listed buildings	CUL-014	Site 7	Concerns over impact	The Applicant notes that no Designated Heritage Assets fall within the Order Limits. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 –	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 97-106, 113-121, 127-130

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Heritage Statement [APP-165 – APP-168], addressed potential impacts to Listed Buildings adjacent Site 7. The assessment acknowledges some temporary impacts to the settings of several Heritage Assets during construction phaseworks; however, with the embedded and proposed mitigation within the Scheme, the assessments have concluded that the Scheme will overall result in no harm to the majority of the Listed Buildings within the proximity of Site 7. The exception to this is the Grade II* Listed Oaks Farmhouse, which is situated c. 150m east of Sub-Site 7L. This assessment notes that the presence of the Solar PV Panels will constitute a minor change in the wider setting of this asset, but as the significance of this asset is not highly influence by this setting, it is not considered that there will be an impact upon the buildings significance, or the ability to appreciate its significance.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Old Rectory, Grade II* listed (NHLE 1373264)	CUL-016	Sub-Site 4B	Concerns over impact and vibration	Potential impacts to designated heritage assets have been addressed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]. The Grade II* The Old Rectory (NHLE 1373264) is located south of Sub-Site 4B. As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this heritage asset, with these areas retained as either open green field or agricultural land. Proposed landscape mitigation, in the form of native broadleaf woodland, will be established c. 420m north of the road, and any gaps in the existing north/south aligned hedgerow through the southernmost field will be infilled. These mitigation measures will result in no harm to the significance of the Old Rectory. Assuming RR-1573 is referring to the Grade II Listed The Old School	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 21, 71-72

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				(NHLE 1050668) and RR-1161 is Church Hill Cottages (NHLE 1373080), both within Saxlingham Nethergate. Both assets are situated along Church Hill, along which an AIL is proposed. Potential impacts to heritage assets from operational vibration of traffic were scoped out (see ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]). The effects of vibration from the construction of the Scheme (excluding the CRC) are considered within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the Outline CTMP [APP-201] to ensure the protection of nearby assets.	
Old Hall, Grade II* listed (NHLE 1050665)	CUL-023	Saxlingham Nethergate	Concerns over impact	Potential impacts to heritage assets within Saxlingham Nethergate, including the Grade II* Listed Old Hall (NHLE 1050665),	Environmental Statement Volume 3 Appendix 10.1 Heritage

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				have been included within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]. The Old Hall is situated along a proposed AIL route. The Applicant notes that traffic surveys recorded existing movements by HGVs on the Local Road Network within the Study Area, as detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Potential impacts to heritage assets from the vibration of traffic were scoped out (see ES Volume 1, Chapter 12: Noise and Vibration [APP-048]). The effects of vibration from the construction of the Scheme (excluding the CRC) are considered within ES Volume 1, Chapter 12: Noise and Vibration [APP-048] for receptors up to a distance of 100m from vibration-generating construction activity. Vibration effects from the CRC are scoped out of the assessment.	Statement [APP-165] , p. 21

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the Outline CTMP [APP-201] to ensure the protection of nearby heritage assets. It was concluded that overall, there will be no impact to the Grade II* Old Hall.	
Thatched properties in South Norfolk	CUL-0124	South Norfolk	Concerns over impact	Potential impacts to all Listed Buildings, not just straw thatched properties, have been included within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] These assessments concluded that with the embedded and proposed mitigation, there will be a neutral effect upon the significance of the majority of Listed Buildings, with the sole exception being the Grade II Listed Moulton Farmhouse (which is not straw thatched), to which there will be a minor adverse	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165]

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				effect, which is considered not significant in EIA terminology.	
Fritton Rectory, Grade II listed (NHLE 1303982)	CUL-025	Fritton	Concerns over impact	The Applicant notes that assessments of potential impacts to Fritton Conservation Area, which includes the Grade II Listed Fritton Rectory (NHLE 1303982), has been provided within ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP 168]. The assessment has concluded that based on the existing environmental baseline, as well as the proposed landscape mitigation in the form of extensive setbacks along the eastern boundary of Sub-Site 5B, as well as removal of Solar PV Panels from the south eastern part of Sub-Site 5B, the Scheme will result in no impact to the Grade II Fritton Rectory.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement {APP-165}, p.25
Moated Site?	CUL-026	Unknown	Concerns over impact	The Applicant welcomes further information from the respondent regarding the location of this property / area so that a more detailed response can be provided.	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Boyland Deserted Medieval Village	CUL-027	Sub-Site 5A	Concerns over impact	Consideration has been given to Boyland deserted medieval village and Hall within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.3 – Archaeological Desk-Based Assessment [AS-020 – AS-021]. Evidence of medieval period activity has been identified within Sub-Site 5A during fieldwork (ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]), and the location of these remains, south of the area identified by Norfolk Historic Environment Record as the site of Boyland Deserted Medieval Village (DMV) (HER 10168) and Boyland Hall (HER 39694), suggests that the remains within this part of Sub-Site 5A are likely to be related to Boyland. In consultation with NCC HES, an Archaeological Mitigation Strategy has been developed, as set out in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] which sets out	Environmental Statement Appendix 10.2 Archaeological Desk-Based Assessment [APP-165] , p. 62-68

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				details of the overarching methodology for undertaking a programme of mitigation. This includes the identified medieval remains within Sub-Site 5A. Requirement 12 of the Draft DCO [AS 032] requires written scheme of investigation, substantially in accordance with the Archaeological Mitigation Strategy, to be submitted and approved with the relevant planning authority.	
Grade II listed buildings along The Street, Fritton	CUL-030	Fritton	Concerns over impact	The Applicant is assuming this is in reference to The Street, which runs through Fritton. The Applicant notes that assessments of potential impacts to Fritton Conservation Area, which includes the Grade II Listed Buildings along The Street, have been provided within ES Volume 3, Appendix 10.1 – Heritage Statement Part 1 [APP-165 – APP-168]. The assessment has concluded that based on the existing environmental baseline, as well as the proposed landscape mitigation in the form of extensive	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165], p.88-89, 92

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				setbacks along the eastern boundary of Sub-Site 5B, which abuts The Street, as well as removal of Solar PV Panels from the south-eastern part of Sub-Site 5B, the Scheme will cause no harm to these heritage assets.	
Iron Age settlement?	CUL-031	Unknown	Concerns over impact	The Applicant welcomes further clarity on the location of the Iron Age Settlement opposite the woodland. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] , further stages of archaeological works will be carried out within the Scheme, including along the length of the Cable Route Corridor. It has been agreed with NCCHEs that the amount and location of any additional archaeological works will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme.	Not assessed

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Lathgreen Farm	CUL-032	Junction of Wash Lane and Marsh Lane, near sub-Site 8A	Concerns over impact	The Applicant is assuming the farmstead being referred to here is Lathgreen Farm, which lies north-west of the junction of Wash Lane and Marsh Lane, c. 170m north-west of Sub-Site 8A. The buildings within this farmstead are neither listed nor considered to be a non-designated heritage asset. As such, it was not included for assessment within either ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] or ES Volume 3, Appendix 10.1 – Heritage Statement [APP 165 – APP-168] .	Not assessed
Oaks Farmhouse, Grade II* listed (NHLE 1170906)	CUL-033	Sub-Site 7L	Concerns over impact	The Applicant notes that potential impacts to the Grade II* Listed Oaks Farmhouse (NHLE1170906) have been assessed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. Regarding Oaks Farmhouse, the assessments do acknowledge that the agricultural hinterland does	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 127-130

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				form part of the wider historic setting of the heritage asset, and that there is a tenurial link between this heritage asset and much of the surrounding land, including Sub-Site 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 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 separates Oaks Farmhouse and Sub Site 7L, with the eastern boundary of Sub Site 7L formed of mature vegetation, though there are some gaps in this hedgerow which provided intervisibility between the heritage asset and the south-eastern corner	

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				of Sub Site 7L. As part of the development of the Scheme, a setback has been established along the eastern boundary of Sub-Site 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-Site 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 Sub-Site 7L 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, 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.	

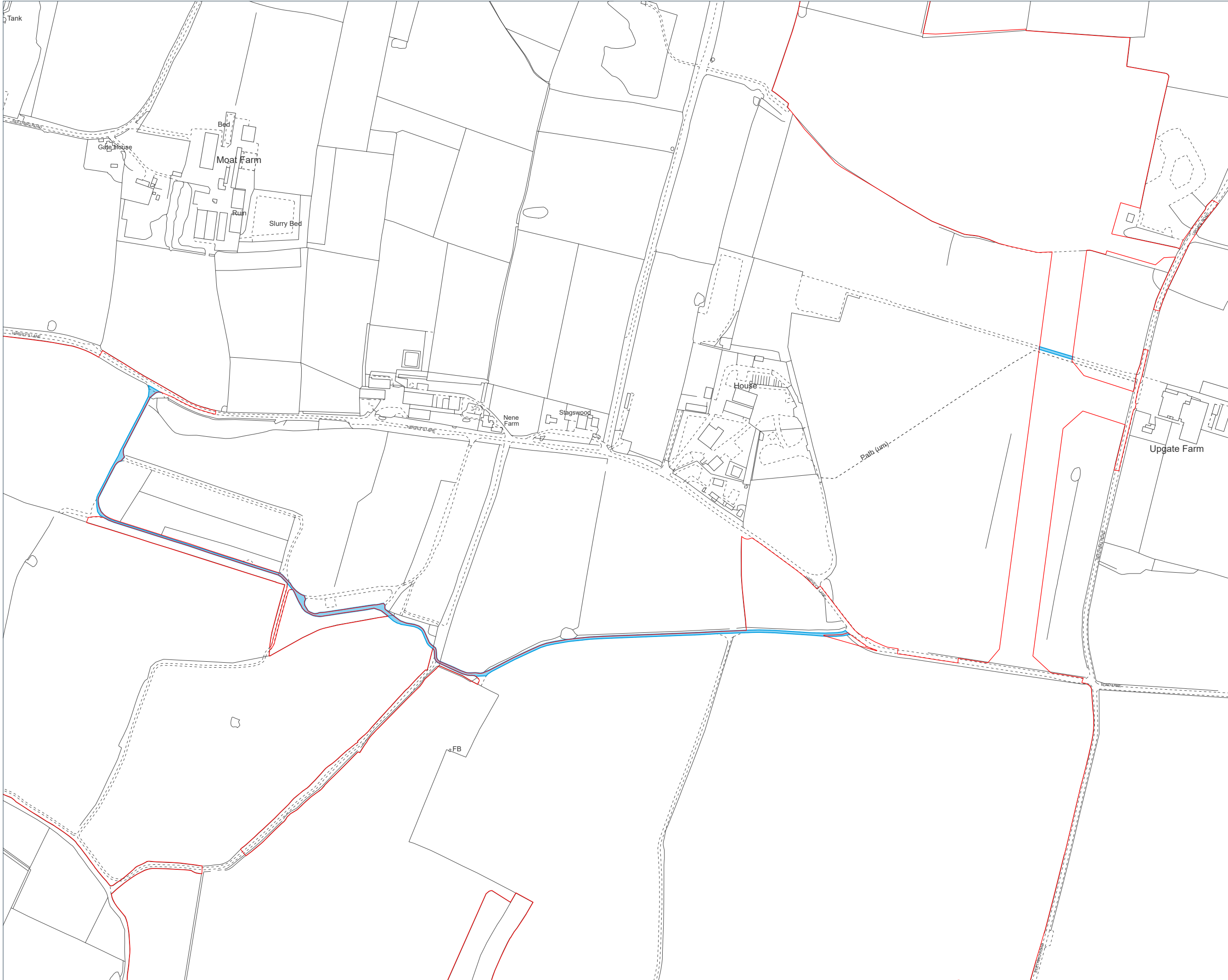
Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Upgate Green Farmhouse, Grade II listed (NHLE 1050681) and Outhouse immediately north of Upgate Green Farmhouse, Grade II listed (NHLE 1304804)	CUL-033	Near sub-Site 8B	Concerns over impact	The Applicant notes that potential impacts to the Grade II Listed Upgate Green Farmhouse (NHLE 1050681), Outhouse Immediately to North of Upgate Green Farmhouse (NHLE 1304804) have been assessed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . Regarding Upgate Farm, as part of development of the Scheme, Solar PV Panels were removed from northernmost field of Sub-Site 8B. The existing substantial hedgerows along the southern part of this field and FP22 will be enhanced under the landscape proposals of the Scheme to offer further screening. The assessments have acknowledged that the wider agricultural setting of Upgate Farmhouse highlights its rural nature and intentional design; however, with the proposed mitigation, the assessment has	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 132-136

Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
				concluded that overall significance of these designated heritage assets will not be harmed by the Scheme.	
Site 6 listed buildings	CUL-034	Site 6	Concerns over impact of construction compound on Grade II listed buildings	The Works Plan [AS-002 and AS-003] does not make reference to a compound within Site 6, though a compound will be present within the Cable Route Corridor immediately to the north. Impacts to Listed Buildings along the Cable Route Corridor have been assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] , compounds have been sited to be sufficiently removed from heritage assets as to avoid or minimise (as practicable) impacts within their settings. These effects would be of a short term duration and would ultimately be reversible, meaning that the scale of effects would soon return to their previous setting unchanged.	Environmental Statement Volume 3 Appendix 10.1 Heritage Statement [APP-165] , p. 96, 163

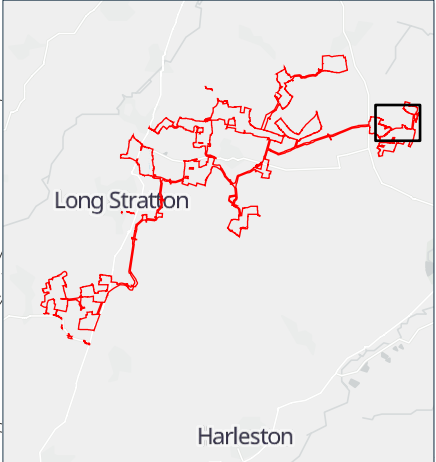
Name of Heritage Asset	ID	Location of Asset	Heritage Issue	Summary of the Applicant's Position	Location in Report
Grade II listed building nears sub-sites 4A and 4B	CUL-036	Sub-Sites 4A and 4B	Concerns over impact	The Applicant welcomes further information from the respondent regarding the location of this property / area so that a more detailed response can be provided.	

Appendix C: Location of Private Roads

Drawing Location: C:\Users\adam.conelio\Documents\East Pye Solar 24003743 - Geomatics\01 DM Plans\020261002_24003743_PLN_INFO_3610.aprx



Site Plan



Location Plan Scale: 1:300000

- Key:
- Order Limits
 - Unadopted Roads

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Harvey, NR15 1EN

Coords: 630584, 295736

Scheme Name:
East Pye Solar

Drawing Name:
Information Plan

Drawing No: 24003743_PLN_INFO_3610.1

Rev	Date	Description
-	06.10.2026	First Issue

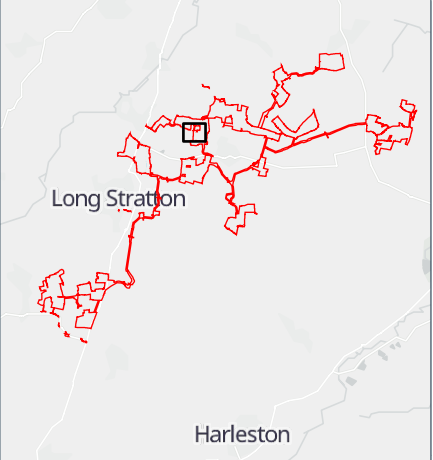
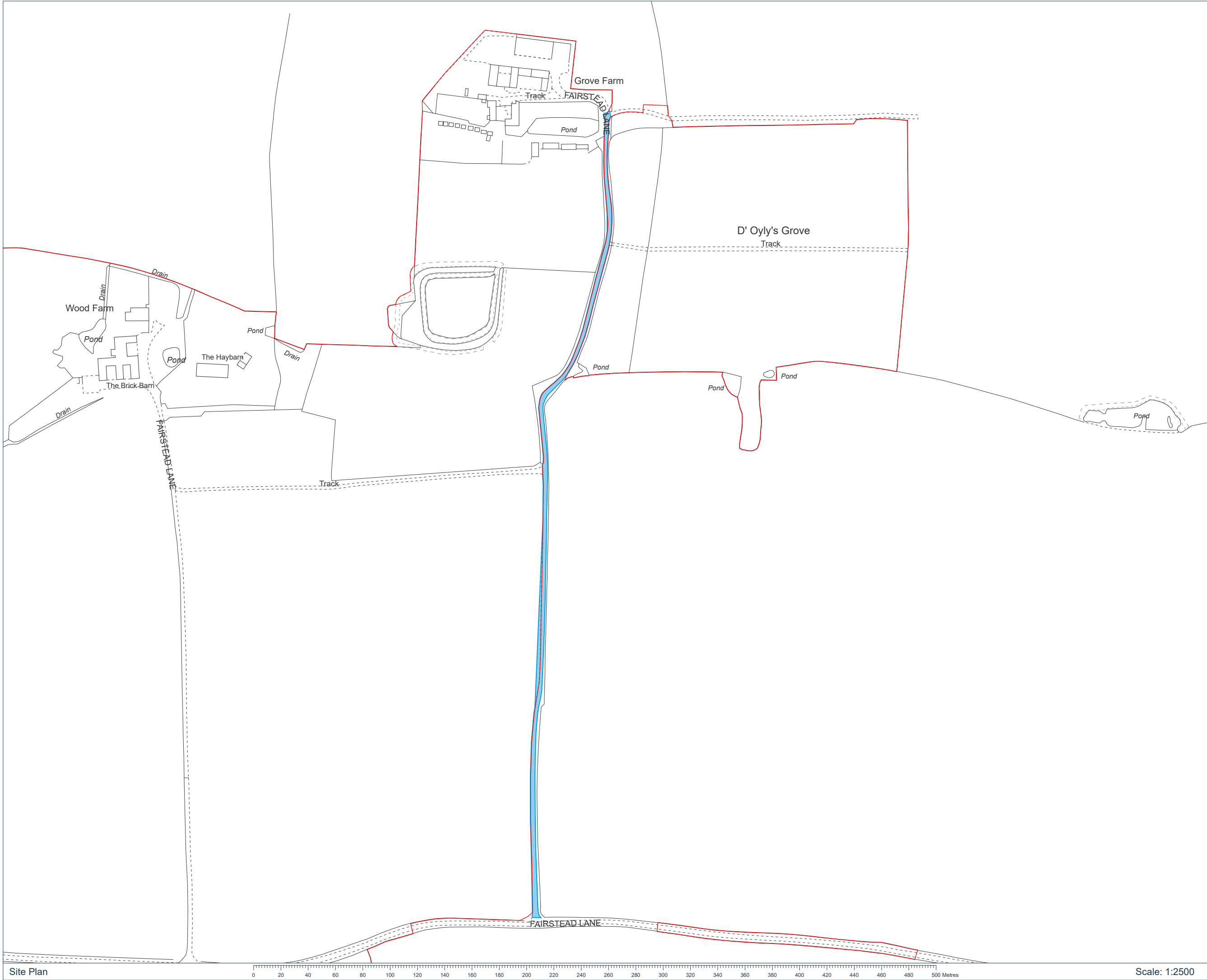
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Approved:	WP	
Sheet No:	1 of 1	
Sheet Size:	A3	

East Pye
SOLAR

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Scale: 1:5000

Drawing Location: C:\Users\adam.cornelio\Documents\East Pye Solar 24003743 - Geomatics\01 DM Plans\20261002_24003743_PLN_INFO_3610.aprx



Location Plan 0 1500 3000 m Scale: 1:300000

- Key:
- Order Limits
 - Unadopted Roads

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Fairstead Lane, Hempnall, South Norfolk,
Norfolk, NR15 2RF

Coords: 622635, 295279

Scheme Name:
East Pye Solar

Drawing Name:
Information Plan

Drawing No: 24003743_PLN_INFO_3610.2

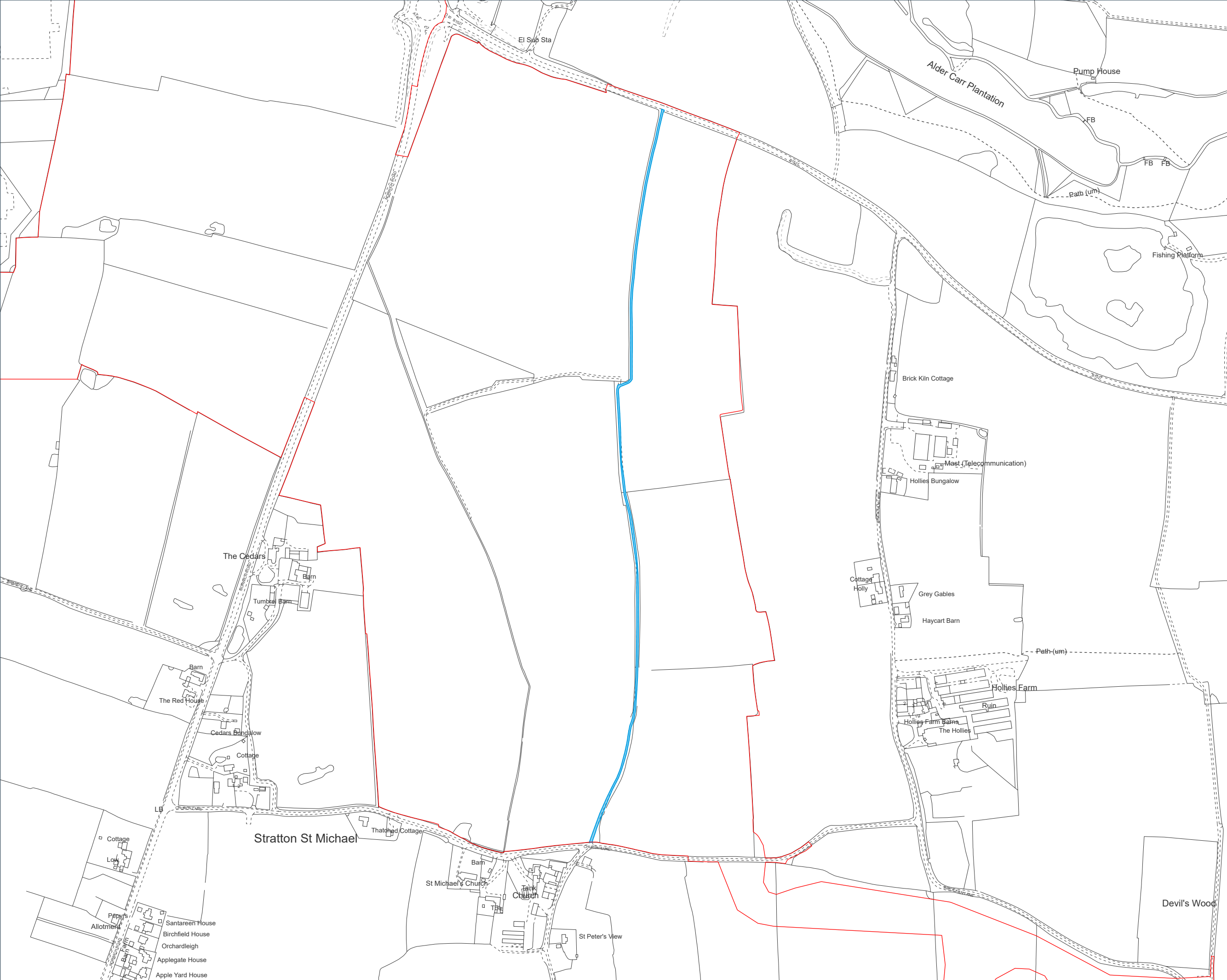
Rev	Date	Description
-	06.10.2026	First Issue

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Approved:	WP	
Sheet No:	1 of 1	
Sheet Size:	A3	

East Pye
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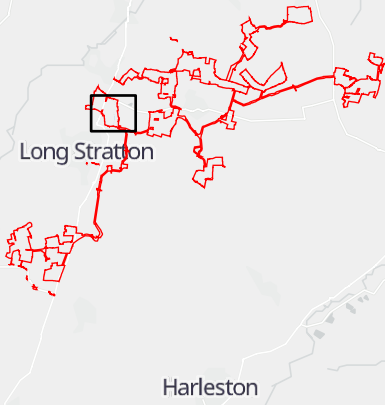
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Site Plan

0 50 100 150 200 250 300 350 400 450 500 550 600 650 700 750 800 850 900 950 1000 Metres

Scale: 1:5000



Location Plan 0 1500 3000 m Scale: 1:300000

- Key:
- Order Limits
 - Unadopted Roads

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Church Lane, Long Stratton, Morningthorpe,
South Norfolk, Norfolk, NR15 2QD

Coords: 620691, 294169

Scheme Name:
East Pye Solar

Drawing Name:
Information Plan

Drawing No: 24003743_PLN_INFO_3610.3

Rev	Date	Description
-	06.10.2026	First Issue

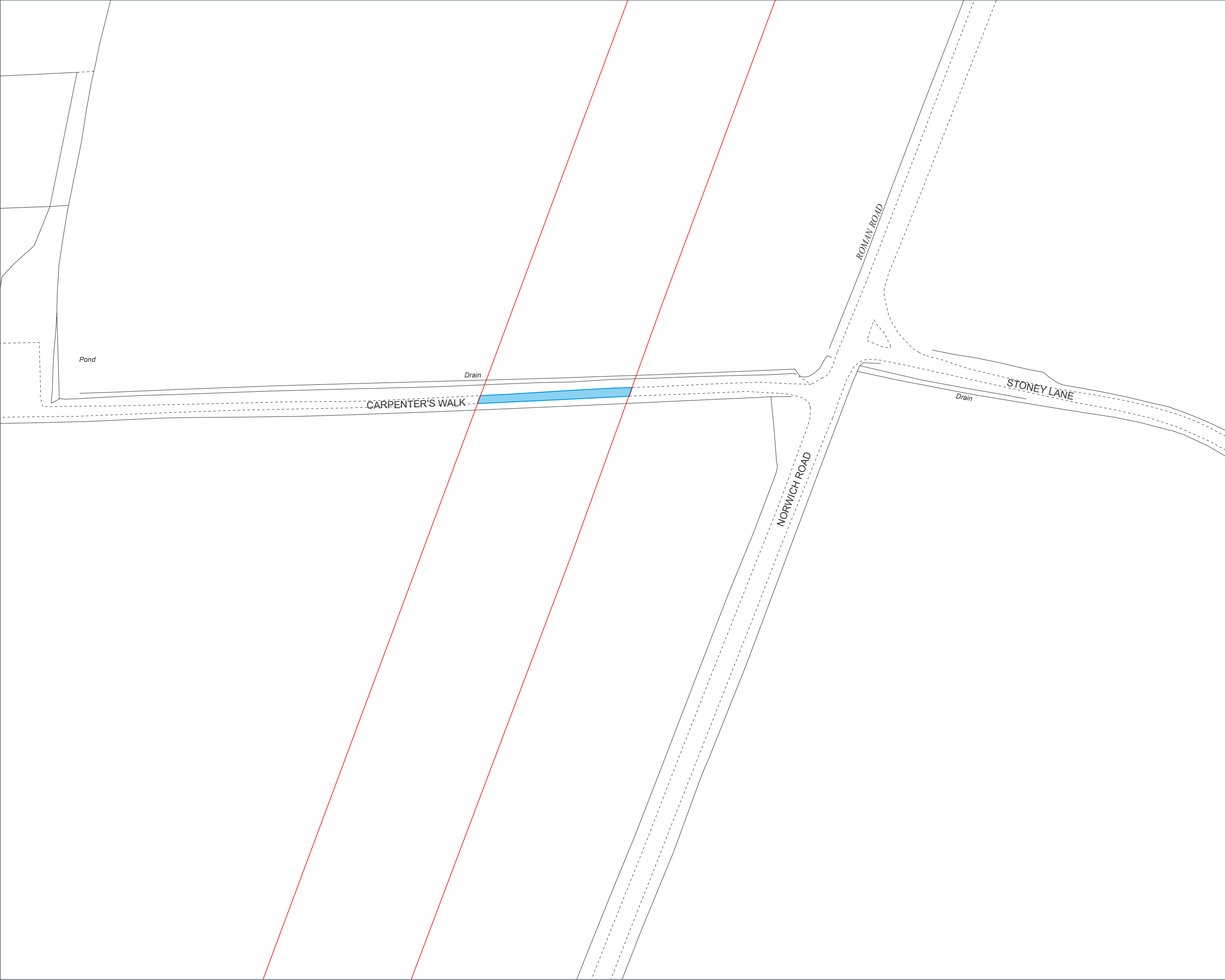
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Approved:	WP
Sheet No:	1 of 1
Sheet Size:	A3



East Pye
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Drawing Location: C:\Users\adam.cornelio\Documents\East Pye Solar 24003743 - Geomatics\01 DM Plans\20261002_24003743_PLN_INFO_3610.aprx



Location Plan Scale: 1:300000

Key:

Order Limits

Unadopted Roads

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Carpenter, NR15 2AU

Coords: 618785, 288360

Scheme Name:
East Pye Solar

Drawing Name:
Information Plan

Drawing No: 24003743_PLN_INFO_3610.4

Rev	Date	Description
-	06.10.2026	First Issue

Drawn:

Approved:

Sheet No:

Sheet Size:

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WP

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