

Process concern: risk of examination proceeding ahead of a settled evidence base (Tas Valley, water courses)

Ross Jolliffe, Tas Valley resident, registration identification number: [REDACTED]

1. Speaking note OFH1 15 Sept. 2026

I live on the banks of the River Tas in Saxlingham, and in 2020 I discovered a rare breeding colony of white clawed crayfish, an endangered and protected species.

In the latter part of my career, I spent ten years leading a team of nearly a hundred scientists providing advice to government on marine *and* fresh water environmental and fisheries management.

I have a clear idea of how important indicator species are and drew my crayfish find to the attention of the authorities. I did so again earlier in this planning process, when I became aware of The Applicant's inadequate evidence, and again in my detailed relevant representation and then again under 'have your say'. Over 90 relevant representations indicated crayfish presence. Nothing has changed.

The Examining Officer had already directed the Applicant to provide an update on crayfish before the examination process commences. (Rule 6 Letter, Annex F, item 9a)(Note WCC: Austropotamobius pallipes, not signal crayfish, Pacifastacus leniusculus).

The Applicant has instead ... restated their compromised position. (Applicant position on WCC).

Firstly, the Applicant now no longer relies upon their original desk study to indicate relevant crayfish absence. This demonstrates that work to date was proven inadequate before submission and remains so now. (Position 1.3.1, my RR, BEPS, Exam 8.5)

Secondly, the ecological assessment process must include mandates of the Water Framework Directive. Any development must not prevent the whole water body from ultimately achieving good environmental status. (Water Environment (Water Framework Directive) (England and Wales) Regulations 2017)

The connectivity of the water course means that a contamination or disease introduced in any part of the river catchment will literally flow downstream to its end, and so, for example, a crayfish need not be underfoot at a spill, to be affected by it later.

To imply that there would be no contact with major parts of the river system and no loss of habitat, because the project will tunnel cables beneath them, misses this point. Indeed, new risks are introduced.

Thirdly, the Applicant's position now seems to rely upon a "precautionary basis". In ecological terms, under the precautionary approach, the developer must comprehensively prove that their activity will not cause unacceptable harm before it can proceed. Their proposed process certainly does not achieve that.

Fourthly, The Applicant offers to review their position, should further, robust and site-specific evidence become available that materially changes understanding etc. (Position, 3.1.1)

Their offer attempts to substitute someone else to do a substantial part of what they have plainly been directed to do by the Examining Officer. I wonder who's job that work might be?

Finally, I do not wish to give the impression that the white clawed crayfish is the new great-crested newt, a blocker to energy solutions.

The environmental issue here is an entire watercourse, *somewhat* protected by regulation *and* government policy.

Urgency and practical issues may otherwise increase the risk of avoidable ecological damage, including from the introduction of disease and/or fluids leaching from machinery or contaminated firefighting water etc, or fundamental change such as legacy toxin disturbance, new drainage systems, change of watercourses, and all the other risks as yet unknown.

2. Comment made at OFH 2

‘Inadequate habitat enhancement’: the Applicant has made reference to habitat enhancement. I commented that these are small-scale and there is no detailed baseline evidence against which to verify change. There is evidence that the construction period, with great disruption, is not considered properly, for example site 6, habitat management is to be used as a site compound.

3. Important new information, crayfish survey at Saxlingham Thorpe

(within 2km of order limits)

Norfolk Rivers Trust conducted a net survey on 24 September 2026. They found 3 white clawed crayfish which were comprised of 1 male and 1 female and 1 juvenile however the habitat is excellent for crayfish refuge, so it was very difficult to find them. The survey also found lamprey, minnow and stickleback of all age classes, as well as very numerous freshwater shrimp, damselfly larvae and 2 great diving beetles (they require clean, well-functioning habitats and rich food webs, their presence and diversity serve as reliable bio-indicators of healthy freshwater ecosystems).

3. Background and notes

The Applicant loads a potential third-party survey with tasks of their own and aims to limit to affected reach – again ignoring Water Framework Directive ... “Such evidence”, they say, “would need to be capable of materially altering the conclusions of the submitted assessment, for example verified recent records or targeted survey results confirming white-clawed crayfish within or immediately adjacent to an affected reach”.

In The Applicant’s response to relevant representations to over 90 people who mentioned crayfish changes nothing but concedes that that crayfish may exist in the River Tas within 2km of the order limits (but from relevant representation reporting, not from The Applicant’s work).

In the Environmental Statement, The Applicant refers to the Rochdale Envelope. This case law resolves a tension: developers often can't fix every detail at application stage, but EIA law requires the likely significant effects to be properly assessed before consent. The compromise is that a scheme can be consented with some design flexibility, provided that (a) the flexibility sits within "clearly defined parameters" and (b) the Environmental Statement assesses the realistic worst case within those parameters, so that the assessed impact is never less severe than the actual impact of the project.

I do not agree that what is left out of survey and other documents is merely low-level detail or that a worst case has been presented.

The Applicant proposes to cover, and fence-in, over 1,200 hectares (or about 3,000 acres) of South Norfolk in solar panels and other industrial infrastructure . There will be at least 2 years of build, followed by up to 60 years of operation and maintenance. This is a colossal disruption of the natural environment, the ultimate impacts of which have only started to be indicated.

I provided a relevant representation and further notes before this meeting to explain why. I respectfully refer you to those records.

5. (1.3.2) The Applicant refers to, ‘low suitability due to a combination of fine sediment deposition...’ This appears an odd thing to lean on because the river Tas where crayfish are now well-known is characterised by easily observed and substantial fine sediment influences where the crayfish thrive (in a breeding population surveyed by Norfolk Rivers Trust). It is likely that crayfish have continued to disperse along the river catchment over hundreds (thousands?) of years seeking territory and will be less numerous and ‘struggling’ in lower quality conditions. This actually makes clear the need for proper survey.

6. National Policy Statement for renewable energy infrastructure (EN-3), 2025

2.10.79 **Culverting** existing watercourses/ drainage ditches should be avoided.

2.10.80 Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.

AI disclaimer: This note was prepared by myself using standard consumer-level AI tools for research, with all document, ecological and legal references either found or manually verified by me.

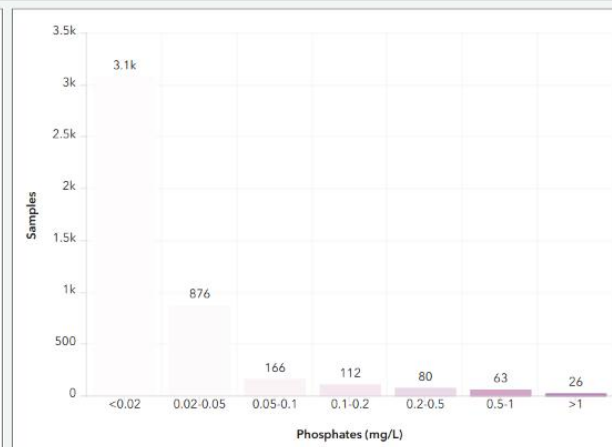
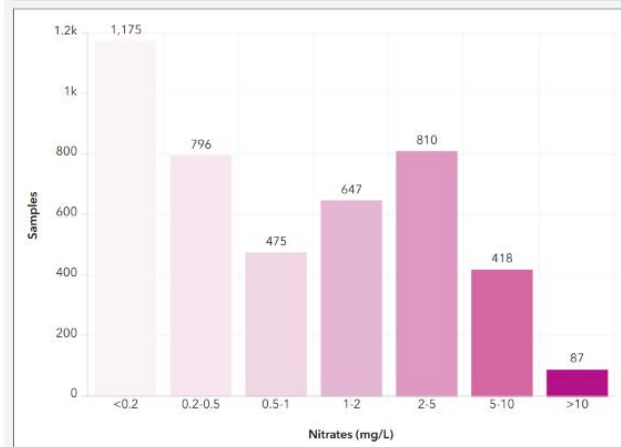
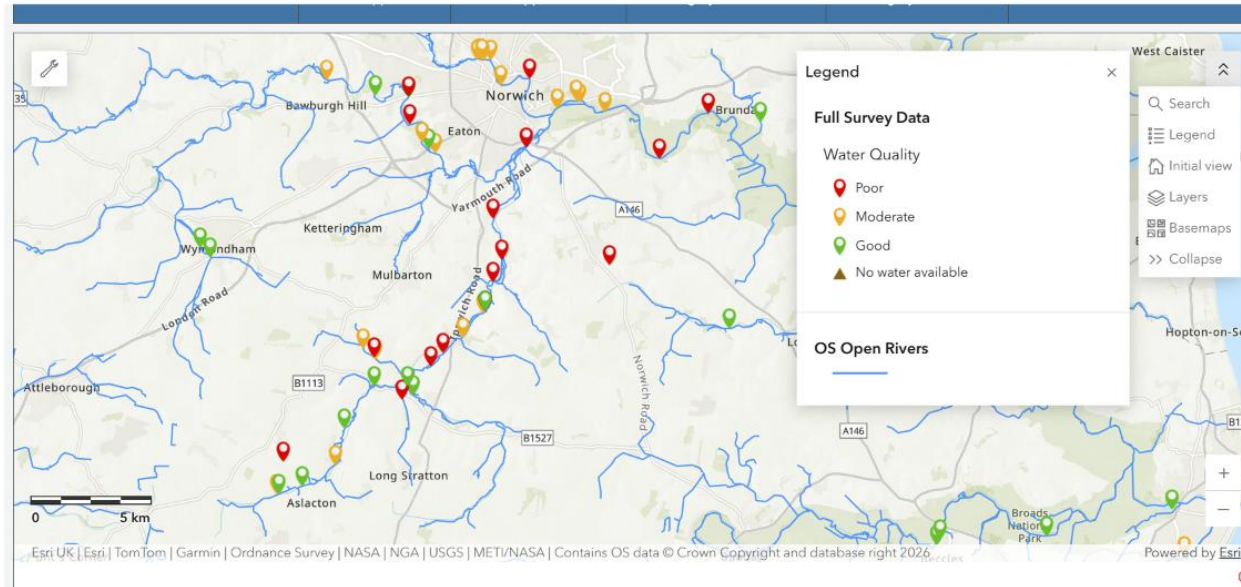
River Tas 18-21 September 2026 citizen science water testing for nitrates and phosphates. Screenshots and note.

Ross Jolliffe, Tas Valley resident, registration identification number: [REDACTED]

(Printout source: <https://www.freshwaterwatch.org/pages/great-uk-waterblitz-results#cm9yfa74w>)



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FAO east Pye Solar Examining Officer.
River Tas water quality indicator (For deadline 1).

Volunteers collected water samples along the river Tas as part of an exercise where data was collected nationally by thousands of volunteers during the Great UK WaterBlitz.

The results indicate growing agricultural inputs (nitrates) downstream and quite low sewage pollution - perhaps influenced by the 2026 dry summer, meaning Anglian Water discharges and e.g. septic tanks are less likely to be overflowing into the catchment.

People developing an interest could look into the Norfolk Rivers Trust data:
<https://theriverstrust.org/sewage-map>
and see EA data by starting here:
<https://engageenvironmentagency.uk.engageenvironmentagency.com/data-publications-water>

River Tas 18-21 September 2026 citizen science water testing for nitrates and phosphates. Screenshots and note.

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What are nitrates and phosphates?

Nitrates and phosphates are natural components of the nitrogen and phosphorus cycles in our environment. As nutrients, they are essential for plant life and thriving freshwater biodiversity. Natural concentrations of these two nutrients can vary due to climate, hydrology, vegetation and mineral composition of soil and rock.

Nitrate ($\text{NO}_3\text{-N}$) is the form of nitrogen most commonly found in soil and fresh water. Aquatic plants absorb nitrate, which is produced naturally by bacteria during an oxidising process known as nitrification. In a healthy waterbody, the amount of nitrogen used by plants is balanced by the capture of atmospheric nitrogen in soil or water by nitrogen-fixing bacteria.

In the UK, a common guideline for ecologically impacted surface waters is 1.0 mg $\text{NO}_3\text{-N/L}$. Polluted freshwater bodies showing high concentrations above 10 mg $\text{NO}_3\text{-N/L}$ are where preventative measures need to be taken.



Phosphate ($\text{PO}_4\text{-P}$) is naturally rare in freshwater environments, however artificial sources of phosphate are often found in fertilisers and our domestic wastewater. Run-off from agricultural land, soil erosion, and improperly managed sewage treatment works can have devastating effects on the health of our waterbodies.

Government guidance recommends that rivers should not exceed annual mean phosphate concentrations of 0.1 mg $\text{PO}_4\text{-P/L}$. Readings that are above 1 mg $\text{PO}_4\text{-P/L}$ evidence severely compromised freshwater.

Why are high levels of nitrates and phosphates such a problem?

Despite being natural components in our environment, too much nitrate or phosphate can cause excessive algae and plant growth. The dominance of specific species can drastically change the delicately balanced functioning of the ecosystem and the optimum habitat conditions for aquatic life. Most importantly, when this algae and excess vegetation dies, the bacteria that degrade the vegetation through decomposition end up consuming a large quantity of oxygen from the water. The result of these reduced oxygen levels is known as the process of 'eutrophication', where fish and other freshwater species can no longer survive.

Agricultural practices and incomplete treatment of sewage are still considered to be the main contributors of water pollution in UK waterways, despite efforts made by catchment management programmes to reduce fertiliser use, increase application efficiency, reduce run-off, and efforts to improve wastewater treatment.

How can the situation be improved?

Improvements in the management of agricultural fertilisers and urban wastewater treatment will make a huge difference. 'Catchment-based approaches' are favoured, as they involve partnerships between local governments, River Trusts, water companies and local communities making decisions together, using combined local knowledge and expertise. This tackles the drivers of pollution at their source.

A community-based approach is able to evaluate the impact of management practices, using valuable citizen science and dedication of volunteers on the ground, whether it's through regular monitoring of a small river restoration project or measuring the impact of a larger catchment-scale enhancement plan.

These solutions require **robust data** to make **evidence-based decisions** and to inform policy changes, and that is where FreshWater Watch volunteers continue to play an essential role.

East Pye Solar (EN0110014): Deadline 1 Written Representation

White-clawed crayfish and the River Tas: request for statutory advice, and response to the Applicant's Position Statement on White-Clawed Crayfish (EXAM/8.5, EN0110014)

Ross Jolliffe, Interested Party registration [REDACTED]

28/09/2026

Summary

The Applicant has not carried out the crayfish survey the Examining Authority (ExA) invited, and now assumes presence instead (EXAM/8.5 §1.3.1, §2.3.1). Whether the evidence is adequate, whether a licence is needed, and whether the River Tas is protected under the Water Framework Directive (WFD) all need expert judgement. Natural England (NE) and the Environment Agency (EA) hold the remit and the records, but neither Relevant Representation mentions white-clawed crayfish (WCC). At scoping the EA objected to the water environment and WCC being scoped out, and the Inspectorate asked the Applicant to commit to survey. A breeding colony lies about 1.7 km from the Order Limits, in the same WFD water body as eight Sub-Sites. I ask the ExA to seek NE's and the EA's advice on this representation in ExQ2.

1. Request for statutory advice

1.1 I ask the ExA to send this representation to NE and the EA and to put the questions at 5.1 and 5.2 to them in ExQ2 (10 November 2026). Neither body's Relevant Representation refers to WCC [NE RR, EN0110014-000363; EA RR, EN0110014-000333].

1.2 Natural England. For Nationally Significant Infrastructure Projects, NE's standing advice states: "Natural England will only confirm if you need a licence" [Standing Advice]. EN-1 §5.4.46 requires the Secretary of State to consider whether the statutory nature conservation body intends to grant relevant protected species licences. NE cannot answer that question without knowing whether WCC are present at the affected reaches.

1.3 Environment Agency. The EA holds the WCC records for the Tas, is the WFD regulator, and permits works affecting Main Rivers. In its scoping response it stated: "We disagree with the conclusion to scope out the water environment, and the associated ecological receptors: ... white-clawed crayfish" [EA Scoping Response, p.1]. It asked for "a commitment ... to survey for crayfish at relevant locations when works affecting watercourse are known" (item FBG7) and for "a drilling fluid breakout plan" (item FBG1). The Inspectorate adopted the survey request [Scoping Opinion, ID 3.15.21].

1.4 Their advice would help the ExA to:

(a) settle on expert evidence a matter disputed since scoping;

(b) test EXAM/8.5 against the standing advice to which the ExA itself referred the Applicant [Rule 6 Letter, Annex F 9(a)];

- (c) identify now whether a licence, Requirement or further information is needed; and
- (d) reach a Recommendation that is robust against EN-1 §5.4.46 and §5.4.56–5.4.57 and the Water Environment Regulations 2017.

2. How the River Tas came to be left outside the assessment

2.1 The Applicant's Scoping Report (January 2025) proposed scoping out the water environment; WCC was "not considered" [Scoping Opinion, ID 3.15.21; EA Scoping Response, p.1]. The Inspectorate recorded that "the River Tas is within the Red Line Boundary", is "a chalk stream priority habitat with a current ecological status of poor" and "should be fully considered within the ES" [Scoping Opinion, ID 3.15.20].

2.2 The aquatic survey then covered only "the 21 watercourses ... that intersect the CRC [cable route corridor] boundaries" [App 8.9 §1.1.1]. Thirteen were dry and excluded [§3.1.1]. Its Figure 1 plots none of the 21 within Sub-Sites 8A or 8B. The only River Tas data are two EA invertebrate stations about 10 km from the Order Limits [§6.2.1]. The WFD Assessment states: "There is no direct interaction between the Order Limits and the River Tas" [App 9.2 §2.4.3].

2.3 I infer that the main river was treated as outside scope because the desk study returned no WCC records within 2 km [App 8.9 §5.1.1], and because easily found records summarised in my own relevant representation were not taken into account. EXAM/8.5 §1.3.1 acknowledges this information only as "identified by Block East Pye" (For reference, I provided the record to Block East Pye).

2.4 The documents conflict: App 9.2 §2.4.3 finds no interaction with the Tas, while EXAM/8.5 §2.2.3 refers to trenchless crossings at the "River Tas and Hempnall Beck Avoidance Areas".

2.5 The Norfolk Rivers Trust confirmed a breeding WCC population in the River Tas at Saxlingham Thorpe in surveys in 2020, 2021 and 2022 [RR 100023694]. By my measurement the Saxlingham Thorpe site (exact coordinates available) is about 1.7 km in a straight line from the nearest Order Limits boundary. It lies in the Tas (Tasburgh to R. Yare) water body, GB105034051230, which also contains Sub-Sites 7C–7F, 7K, 7L, 8A and 8B [App 9.2 §2.4.2, §3.3.4]. App 9.2 nevertheless records no sensitive receptors "associated with this WFD water body" [§3.3.3] and does not mention WCC. WFD deterioration is assessed for the water body as a whole. A colony in the same water body is therefore within the scope of the WFD Assessment. The 2 km desk-study radius is not relevant.

2.6 ES Chapter 9 rates the "River Tas and Hempnall Beck (chalk streams)" as of Very High sensitivity [ES Ch 9, Table 9.4], but refers ecological receptors to Chapter 8 [ES Ch 9, §9.5.15; Table 9.2], whose aquatic survey did not include the Tas (see 2.2). Crayfish are therefore assessed in neither chapter. Chapter 9 rates construction spills and sediment on these rivers as "a worst case magnitude of impact of Negligible" [§9.8.12], without reference to any aquatic species. By contrast, it rates reduced fertiliser use as "a worst case High magnitude of impact" [§9.8.52], although Table 9.5 reserves High for a change of two WFD classes, which is not shown. The scale has been applied more readily to benefits than to harms.

3. Response to EXAM/8.5

3.1 The survey was declined. EXAM/8.5 §2.3.1 confirms no survey in 2026 and none proposed. The ExA had asked for survey or “robust justification” [Rule 6 Letter, Annex F 9(a)]. The drought reason conflicts with the standing advice, which lists manual hand searching “when the water is clear, the flow is low”, and with App 8.9, which describes the 2025 visits as made “during optimal low flow conditions” [§2.2.1] and requires review after “further drought” [§2.4.1].

3.2 Assuming presence is not a route the standing advice offers. It states: “You should ask for a survey if distribution and historical records suggest WCC may be present” and “Absence of a record does not mean there are no WCC.” The Applicant’s consultant advised that “additional targeted survey (or a more detailed method statement supported by regulatory consultation) may be required at detailed design stage” [App 8.9 §2.3.2]. EXAM/8.5 records neither.

3.3 The habitat evidence is overstated. EXAM/8.5 §2.3.2 relies on “the absence of key habitat features ... including stable coarse substrates, persistent undercut banks, exposed or submerged root systems”. App 8.9 recorded “cobble and gravel substrate”, “exposed or submerged tree roots” and a deep pool [§3.4.3]; cobbles, riffles, tree roots and woody debris [§5.1.6]; and “minor bank undercutting” [§5.1.3]. These were judged compromised by silt, not absent. The survey recorded “substrate classes visible from the bank” [§2.2.2], whereas refuges must be “fully submerged” [Standing Advice].

3.4 The conclusion is generalised beyond the data. Six reaches were described; the exclusion of dry features “should not be interpreted as confirmation of negligible ecological relevance” [App 8.9 §2.3.3]. No surveyed reach is on the Tas, or on the Unnamed Tributary (an EA Main River) crossed between Sub-Sites 8A and 8B [App 9.2 §2.4.5–2.4.6].

3.5 “Direct disturbance” is not avoided on the Applicant’s own worst case. The WFD Assessment assumes “culverts in channel ... in a wet channel” for access crossings [App 9.2 §2.5.7] and screens in the Tas water body for that reason [§3.3.6]. The crossing method is “subject to detailed design” and its depth is not established [§3.3.5]. The standing advice lists “new culverts” as a threat.

3.6 Drilling-fluid breakout is not addressed. EXAM/8.5 §2.2.4 relies on Method Statement 7 [App 8.10 §8]. That statement covers pit siting, vibration and sediment, with water monitoring specified only at Hempnall Brook [Beck] (CRC7) [§8.2.3]. It does not mention drilling fluid, breakout, the River Tas or crayfish plague. The EA asked for a breakout plan in 2025 [FBG1] and for confirmation that Main River crossings will be trenchless [EA RR, EA8]; Norfolk County Council (NCC) questions the suitability of HDD at these watercourses [NCC RR §4.40].

3.7 The Applicant’s promises in EXAM/8.5 to reconsider its position if circumstances change depend upon evidence that the Applicant will not collect (and they are not secured in the draft DCO). §2.2.5–2.2.6 reject compensation and monitoring because “no loss of confirmed white-clawed crayfish habitat” has been identified. §3.1.1 would review only on “verified recent records or targeted survey results”. This moves the burden of evidence onto third

parties; the standing advice places it on developers (“Developers should submit information...”). The Applicant should state how such commitments could be secured.

3.8 Relevant evidence is omitted. EXAM/8.5 does not refer to Scoping Opinion ID 3.15.21, or to NCC’s point that “The absence of signs during a walkover survey cannot be taken to confirm absence” [NCC RR §4.45], or to my RR. ES Chapter 8 cites “a single record ... approximately 6km downstream” and, separately, “one record from 2020” [ES Ch 8, species table and §8.9.453]. The Applicant should confirm where the 2020 record is (I assume as reported by Block East Pye in December 2025 because my own report submitted with my relevant representation that included three surveys by NRT and other background was not mentioned).

Since then a September 2026 survey by NRT in the Saxlingham Thorpe site again confirms a breeding population of WCC.

(In addition, on 16 September 2026 a NCC councillor told me about WCC that they observed some 30 years ago in the beck running through Saxlingham Nethergate. This verbal report is anecdotal but indicates long-standing and dispersed presence in the same way as the Hempnall Beck angler’s report mentioned in my representations.)

4. Legal and policy basis

4.1 WCC: Wildlife and Countryside Act 1981, Schedule 5; NERC Act 2006 s41; Habitats Directive Annexes II and V. The standing advice is a material consideration.

4.2 EN-1 (2025): §4.2.12 (examination is not for addressing deficiencies); §5.4.46, §5.4.49, §5.4.56–5.4.57 (licences; weight to protected species; refusal where harm results unless the legal tests are met). Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572).

4.3 ODPM Circular 06/2005, para 99 (cited in EN-1 §5.4.3): “It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.” See *R v Cornwall County Council ex p Hardy* (2000), where permission was quashed because surveys the authority had found necessary had not been carried out before the decision.

4.4 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (SI 2017/407); Case C-461/13 (Weser ruling): deterioration of a single quality element by one class is deterioration.

5. Requests to the ExA

5.1 ExQ2 to Natural England: (a) Is EXAM/8.5 consistent with the standing advice where records suggest presence? (b) Can NE confirm whether a WCC licence is needed without presence data for the affected reaches? (c) What survey would NE advise, where and when?

5.2 ExQ2 to the Environment Agency: (a) Does the EA confirm WCC in water body GB105034051230? (b) Does App 9.2 adequately assess WCC and the whole water body? (c)

Do Method Statement 7 and the Outline CEMP meet the EA's request for a drilling-fluid breakout plan?

5.3 ExQ2 to the Applicant: reconcile App 9.2 §2.4.3, EXAM/8.5 §2.2.3 and Scoping Opinion ID 3.15.20 on River Tas interaction; locate the 2020 record; reconcile EXAM/8.5 §2.3.2 with App 8.9 §3.4.3, §5.1.3 and §5.1.6; confirm the crossing method and whether in-channel culverts remain possible in the Tas water body; explain on what evidence ES Chapter 9 §9.8.12 assigns Negligible magnitude to construction effects on the River Tas and Hempnall Beck, and how the High magnitude at §9.8.52 meets the two-class criterion in Table 9.5; and state where effects on WCC in these rivers are assessed.

5.4 The July–September 2026 survey window has passed. A survey complying with the standing advice cannot now report before the examination closes in February 2027. I ask the ExA to seek NE's and the EA's advice on whether the evidence is sufficient to recommend consent, having regard to EN-1 §4.2.12 and Hardy.

5.5 Without prejudice to 5.4, if consent is recommended, I propose this Requirement:

“White-clawed crayfish. (1) No part of the authorised development that crosses, or lies within 10 metres of, a watercourse in the Hempnall Beck or River Tas (Tasburgh to R. Yare) water bodies may commence until a white-clawed crayfish method statement has been submitted to and approved by the relevant planning authority, following consultation with Natural England and the Environment Agency. (2) The method statement must be informed by a presence/absence survey carried out in accordance with Natural England's standing advice and must include: biosecurity measures against crayfish plague; a drilling-fluid breakout prevention and response plan; the exclusion of in-channel culverts where white-clawed crayfish are present; and baseline and post-construction monitoring. (3) The method statement must be implemented as approved.”

Use of artificial intelligence

I used Claude (Anthropic), through the Claude desktop app, to search and compare text in the documents listed below, to check quotations and paragraph references, and to help draft and shorten the wording. The sources are the examination library documents, legislation and guidance listed in the references, and my own Relevant Representation. AI did not create or alter any evidence. The distance at 2.5 was measured by me and then verified in a calculation by Claude from Order Limits boundary data that I digitised from the Applicant's Location Plan. The work was done over several sessions, with each quotation checked against its source. I have reviewed and amended the whole text and take responsibility for its accuracy. I used AI appropriately and necessarily because of the volume of application and other documents and the Deadline 1 timetable.

References

[EXAM/8.5] Applicant's Position on White Clawed Crayfish, Rev 1, September 2026. EN0110014-000572.

[App 8.9] ES Vol 3 Appendix 8.9, Aquatic Habitat Assessment Report, Rev 1, March 2026. APP-160 (EN0110014-000225).

[App 8.10] ES Vol 3 Appendix 8.10, Outline Protected Species Mitigation Strategy, Rev 1, March 2026. APP-161 (EN0110014-000226).

[App 9.2] ES Vol 3 Appendix 9.2, Water Framework Directive Assessment, Rev 1, March 2026. APP-163 (EN0110014-000227).

[ES Ch 8] ES Vol 1 Chapter 8, Ecology and Biodiversity. APP-044 (EN0110014-000108).

[ES Ch 9] ES Vol 1 Chapter 9, Water Environment. APP-045 (EN0110014-000109).

[Outline CEMP] Outline Construction Environmental Management Plan, Rev 1, March 2026. APP-196 (APP/7.1).

[dDCO] Draft Development Consent Order, Revision 2, July 2026. APP/3.1 (EN0110014-000396).

[Location Plan] Applicant's Location Plan.

[Scoping Report] Applicant's EIA Scoping Report, January 2025.

[Scoping Opinion] Planning Inspectorate, Scoping Opinion for East Pye Solar, 25 February 2025. EN0110014-000012; reproduced as ES Appendix 2.2, EN0110014-000181.

[EA Scoping Response] Environment Agency letter XA/2025/100250/01-L01, 12 February 2025, and Appendix 1 (items FBG1, FBG7). In Scoping Opinion Appendix 2 (EN0110014-000181, PDF pp.139–148).

[Rule 6 Letter] Rule 6 Letter, 15 July 2026, Annex F item 9(a). PD-005 (EN0110014-000408).

[Rule 8 Letter] Rule 8 Letter, 23 September 2026. EN0110014-000642.

[NE RR] Natural England Relevant Representation, 10 June 2026. EN0110014-000363.

[EA RR] Environment Agency Relevant Representation, 4 June 2026. EN0110014-000333.

[NCC RR] Norfolk County Council Relevant Representation, 10 June 2026. EN0110014-000360.

[BEPS RR] Block East Pye Solar Relevant Representation. EN0110014-000317.

[BEPS December 2025] Block East Pye Solar submission to East Pye Solar Ltd.

[RR 100023694] Ross Jolliffe, Relevant Representation and attachment "River Tas white-clawed crayfish evidence and threats summary", v1.1, 9 June 2026.

[NRT 2026] Norfolk Rivers Trust, white-clawed crayfish survey, Saxlingham Thorpe, 24 September 2026, personal email (I can request a short statement of finding if ExO finds necessary).

[Standing Advice] Natural England, "White-clawed crayfish: advice for making planning decisions", GOV.UK, last updated 7 April 2025.

[EN-1] Overarching National Policy Statement for Energy (EN-1), 2025, published 6 January 2026.

[Circular 06/2005] ODPM Circular 06/2005 / Defra Circular 01/2005, Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, 2005.

[EIA Regulations] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, SI 2017/572.

[WFD Regulations] Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, SI 2017/407.

[WCA 1981] Wildlife and Countryside Act 1981, Schedule 5.

[NERC Act] Natural Environment and Rural Communities Act 2006, section 41.

[Habitats Directive] Council Directive 92/43/EEC, Annexes II and V.

[Hardy] R v Cornwall County Council, ex p Hardy [2001] Env LR 25, High Court (Harrison J), 22 September 2000, CO/4784/99.

[Weser] Case C-461/13 Bund für Umwelt und Naturschutz Deutschland v Bundesrepublik Deutschland, CJEU, 1 July 2015.

Abbreviations

AI – artificial intelligence

APP- – Examination Library reference for application documents

App – Appendix (to the Environmental Statement)

BEPS – Block East Pye Solar

CEMP – Construction Environmental Management Plan

Ch – Chapter

CJEU – Court of Justice of the European Union

CO/ – Crown Office file number

CRC – cable route corridor

dDCO – draft Development Consent Order

Defra – Department for Environment, Food and Rural Affairs

EA – Environment Agency (EA8 = issue 8 in its RR)

EIA – Environmental Impact Assessment

EN-1 – Overarching National Policy Statement for Energy

Env LR – Environmental Law Reports

ES – Environmental Statement

ExA – Examining Authority

EXAM/8.5 – Applicant's Position on White Clawed Crayfish

ExQ2 – ExA's second written questions
FBG – item prefix in the EA scoping response
HDD – horizontal directional drilling
ID – paragraph identifier in the Scoping Opinion
NCC – Norfolk County Council
NE – Natural England
NERC Act – Natural Environment and Rural Communities Act 2006
NRT – Norfolk Rivers Trust
ODPM – Office of the Deputy Prime Minister
para – paragraph
PD- – Examination Library reference for procedural documents
RR – Relevant Representation
s – section
SI – Statutory Instrument
Vol – Volume
WCA – Wildlife and Countryside Act 1981
WCC – white-clawed crayfish (*Austropotamobius pallipes*)
WFD – Water Framework Directive