East Pye Solar

The Applicant's Comments on Local Impact Reports

Revision 1

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides the Applicant's response to the Local Impact Reports received by Norfolk County Council, South Norfolk Council and Suffolk County Council, which were submitted at Deadline 1.

1.1.2 The Local Impact Reports submitted by Norfolk County Council is [REP1-211], by South Norfolk Council is [REP1-212] and by Suffolk County Council is [REP1-213], which can be viewed in the Examination Library. Norfolk County Council and South Norfolk Council are host authorities; Suffolk County Council is an adjoining authority who have submitted a Local Impact Report in the Examination.

1.2 Structure of the Report

1.2.1 This document is structured as follows:

- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to submissions. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-036]**.
- **Section 2** of this document provides responses to the Local Impact Report from Norfolk County Council, set out in **Table 2.1**.
- **Section 3** of this document provides responses to the Local Impact Report from South Norfolk Council, set out in **Table 3.1**.
- **Section 4** of this document provides responses to the Local Impact Report from Suffolk County Council **Table 4.1**.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's East Pye Solar Examination Library.

Table 1.1 List of Acronyms of Submission Documents

Acronym	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

Acronym	Document
BNG	Biodiversity Net Gain
Shadow HRA	Shadow Habitat Regulations Regulation
Outline CEMP	Outline Construction Environmental Management Plan
Outline OEMP	Outline Operational Environmental Management Plan
Outline DEMP	Outline Decommissioning Environmental Management Plan
Outline SRMP	Outline Soil Resources Management Plan
Outline PRoWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
Outline LEMP	Outline Landscape and Ecology Management Plan
Outline ESSCS	Outline Employment, Skills and Supply Chain Strategy
Outline BSMP	Outline Battery Safety Management Plan
Outline CTMP	Outline Construction Traffic Management Plan
Outline OTMP	Outline Operational Traffic Management Plan

2 The Applicant's Responses to Norfolk County Council's Local Impact Report

Table 2.1 Applicant's Responses to Norfolk County Council's Local Impact Report [REP1-211]

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
LIR-NCC-001	General remarks	1.1 Norfolk County Council (the County Council) is the upper-tier local government organisation for the county of Norfolk. We have a wide range of statutory and non-statutory responsibilities to provide services and discharge regulatory functions including, among other things, as county planning authority, local highway authority, traffic authority, transport authority, street authority, lead local flood authority, fire and rescue authority, local authority with public health responsibilities, library authority, provider of archaeological services, and maintainer of Norfolk's historic environment record. 1.2 The County Council has considerable experience of nationally significant infrastructure projects, with eighteen projects at various stages in Norfolk. Two projects, including East Pye, are currently at examination, one is at the recommendation stage and eight more at	The Applicant welcomes the Local Impact Report (LIR) submitted by Norfolk County Council (NCC) as the host authority for the Scheme as well as fulfilling the statutory and non-statutory functions listed. The Applicant has provided detailed responses to each point raised within the LIR herein. A draft Statement of Common Ground with Norfolk County Council has been submitted at Deadline 1 **[REP1-085]** which reflects discussions between the Applicant and NCC across the topics covered by the Local Impact Report. An updated Statement of Common Ground is being produced with NCC, to be submitted at Deadline 3 in line with the timetable set out within the Rule 8 Letter **[PD-007]**. The SoCG, to be submitted at Deadline 3, will set out an update on discussions in relation to each of the matters raised within the Local Impact Report.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		pre-application stage, with the remaining schemes consented. In relation to East Pye Solar, the County Council is an interested party because land to which the application relates is located within Norfolk. This Local Impact Report is submitted to assist the Examining Authority by drawing upon the County Council's local knowledge, statutory functions, and topic-specific expertise.	
LIR-NCC-002	General remarks	2.1 The County Council has prepared this Local Impact Report to assist the Examining Authority's consideration of the likely impacts of the East Pye Solar project within Norfolk. The report draws upon the County Council's statutory roles as county planning authority, local highway authority, lead local flood authority, minerals and waste planning authority, fire and rescue authority, and custodian of Norfolk's historic environment record. It provides an initial assessment of the project's compliance with relevant national policy statements, local policy and technical standards, and identifies where impacts are acceptable, where further information is required, and where mitigation, requirements, obligations or other control mechanisms should be secured through	Detailed responses to the matters raised by NCC in its statutory role as county planning authority, local highway authority, lead local flood authority, minerals and waste planning authority, fire and rescue authority, and custodian of Norfolk's historic environment record are set out herein. The Applicant's position on the compliance of the Scheme with national and local policy is set out within both the **Planning Statement [REP1-074]**, and the **Policy Compliance Document [REP1-076]**. An assessment of the environmental impacts of the Scheme is set out within the **ES [APP-036 to APP-195]**.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		the Development Consent Order or associated legal agreements.	
LIR-NCC-003	General remarks	2.2 The County Council's overall position remains one of objection. The objection is based on serious strategic concerns relating to the loss of high-quality agricultural land, the cumulative impact of the project alongside other large-scale solar and energy infrastructure projects in Norfolk, and the effects of the project on Norfolk's environment, local communities and businesses. The County Council will nevertheless continue to work constructively with the Applicant to minimise impacts and maximise benefits where possible.	The Applicant notes NCC's concerns in relation to agricultural land, cumulative effects, and effects to local communities and businesses. The Applicant has provided detailed responses in relation to these topics in the following rows: • Agricultural land and cumulative effects – comment IDs LIR-NCC-007 to 013 • Impacts to local communities and businesses – comment IDs LIR-NCC-007 to 012 and LIR-NCC-177 to 183. The Applicant will continue to engage constructively with NCC throughout the Examination on these matters and consider any actions recommended by NCC to bring both parties into alignment where appropriate.
LIR-NCC-004	General remarks	2.3 Across several topic areas, most notably landscape and visual, ecology and biodiversity, arboriculture, traffic and transport, archaeology, and hydrology, land drainage and flood risk, the County Council identifies matters requiring further clarification, strengthened mitigation or more secure commitments. In flood risk	The Applicant notes where requests have been made for further clarifications or strengthened mitigation or commitments. Further clarifications in response to the matters raised within the LIR have been provided within this document and cross references have been made within this document to where updates have been made within the application documentation to address comments. Where the Applicant does not

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		terms, the County Council as lead local flood authority cannot presently be satisfied that the development would avoid increasing flood risk on-site or elsewhere. In transport terms, the County Council cannot support the current routing and access strategy due to unresolved highway constraints and insufficient mitigation. In landscape terms, the scale of the scheme means that recreational, experiential and locally valued landscape effects require careful scrutiny and may need additional mitigation and enhancement.	agree that updates are necessary, justification for the approach has been provide within each row of this response document. The Applicant will continue to engage constructively with NCC throughout the Examination on these matters and consider any actions recommended by NCC to bring both parties into alignment where appropriate. The Applicant has addressed matters raised in respect of flood risk within comment IDs LIR-NCC-150 to 171. Transport and access comments have been addressed within comment IDs LIR-NCC-123 to 149. Landscape and visual comments have been addressed within comment IDs LIR-NCC-014 to 083
LIR-NCC-005	General remarks	2.4 The County Council is content that certain other matters may be capable of resolution, or are acceptable in principle, subject to further details and suitable control mechanisms. The socio-economic proposals offer an opportunity to secure local employment, skills and supply-chain benefits. The minerals safeguarding assessment is broadly acceptable in principle, although the County Council disagrees with assumptions about future non-hazardous landfill capacity in Norfolk. Fire and rescue matters require continued	The Applicant welcomes NCC's engagement on these matters, and notes that updated positions subject to further discussion will be presented within the NCC SoCG to be submitted at Deadline 3. The Applicant has provided detailed responses in relation to these topics in the following rows: • Local employment, skills, supply chain – comment IDs LIR-NCC-173 to 176; • Minerals safeguarding – comment IDs LIR-NCC-184 to 189.

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		engagement to secure compliance with relevant guidance for grid-scale energy storage and battery safety management.	• Fire and rescue / battery safety management – comment IDs LIR-NCC-190 to 209. • Non-hazardous landfill capacity – comment IDs LIR-NCC-188 to 189.
LIR-NCC-006	General remarks	3.1 A local impact report is defined by section 60 of the Planning Act 2008 as a report in writing giving details of the likely impact of the proposed development on the authority's area, or any part of that area. National infrastructure planning guidance explains that an LIR is a report submitted by an affected local authority and is based on the local authority's existing body of local knowledge and robust evidence of local issues, including an appraisal of the proposed development's compliance with local policy and guidance. 3.2 This LIR is submitted by the County Council in relation to the East Pye Solar proposed development. Unless otherwise stated, this LIR relies on the Applicant's description of the scheme in the application documents. Where the County Council disagrees with the Environmental Statement's findings, this report aims to be	The Applicant notes this comment.

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		explicit as to the nature and extent of the disagreement. 3.3 This report is structured as follows. Sections 1 to 3 deal with introductory matters and provide an executive summary. Sections 4 to 13 provide a detailed description of local impacts organised by topic. In each topic section, the County Council provides relevant policy context where appropriate, a description of the impacts, and an explanation of any requirements, obligations or other measures considered necessary as a result of those impacts.	
LIR-NCC-007	Strategic and cumulative impacts (Summary)	4.1 The County Council strongly opposes the proposed East Pye Solar Farm because of strategic concerns relating to the loss of high-quality agricultural land and the cumulative impact of the project on Norfolk's environment, local communities and businesses when considered alongside other major infrastructure proposed in this part of Norfolk.	The Applicant is aware of other projects in the region. The **ES [APP- 042 to 054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. A comprehensive Cumulative Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA Methodology [APP-038]. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES. The Applicant will continue to discuss

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			the list of cumulative schemes with NCC as the examination progresses. Each topic chapter within the ES **[APP-042 – APP-054]** sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or Scheme. A summary of all cumulative effects is provided within Table 20.4 of **ES Volume 1, Chapter 20 - Summary of Residual Significant Effects [APP-056]**. Within **ES Chapter 15 – Soils and Agricultural Land – Section 15.11 [APP-051**] three developments were assessed for cumulative impacts. These were identified from a long list which was refined following consultation with the relevant Local Planning Authorities. The three assessed developments are; 1. EN0110010 High Grove Solar Farm 2. EN0110013 The Droves Solar Farm 3. EN0110019 EcoPower Suffolk Solar These three cover a total of 3,073 ha of agricultural land. Together with East Pye,4,100.5 ha of agricultural land is involved. It is concluded from these three developments that there is the potential for permanent land take to exceed 20ha of BMV which would result in a moderate adverse effect which would be significant in EIA terms.

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			The effect on food production and on the wider economy is concluded to be not significant. The area on farms in Norfolk is about 417,633ha (presented in Table 15.9 **of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051])**. The three schemes together with East Pye would involve of the order of 4,100 ha which is 1% (0.98%) of the agricultural area of the County. To put this in context, currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) of Norfolk is not being cropped. The effect on food production and the related rural economy, with or without continued agricultural production from sheep grazing, is not significant on a local, county, regional or national basis.
LIR-NCC-008	Strategic and cumulative impacts (Policy Context)	4.2 The project is promoted as solar generation infrastructure and is therefore to be considered in the context of national energy policy, including EN-1 and EN-3. While national policy strongly supports renewable energy infrastructure, the mitigation hierarchy continues to apply, and the decision-maker must consider the likely impacts of the proposed development and the extent to which they can be avoided, reduced, mitigated or compensated.	The Applicant's position on the planning balance is set out within the **Planning Statement [REP1-074]**, which concludes that the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible, in compliance with NPS EN-1 and EN-3. The Applicant has further set out a detailed response on how the mitigation hierarchy has been applied in response to the Examining Authority's Written Question (Q1.1.1) **[REP1-083].**

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LIR-NCC-009	Strategic and Cumulative Impacts (Impacts)	4.3 The proposed development would occupy approximately 1,212 hectares of agricultural land extending across South Norfolk from Great Moulton to Seething. The County Council's strategic concern is not simply the scale of East Pye Solar in isolation, but the cumulative loss and clustering of agricultural land and rural landscapes associated with East Pye Solar, The Droves Solar Farm, High Grove Solar Farm, the neighbouring Tasway Energy Park. EcoPower Suffolk is another NSIP solar project which is outside of Norfolk but is part of the same pattern of development as East Pye and Tasway, following the A140 corridor due to the presence of a 400kV transmission line and the Norwich to Tilbury project.	The total Order Limits is 1,212 ha (presented in Table 15.6 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**), but that includes non-agricultural land and the Cable Route corridor. The area of agricultural land for Sites 1 to 10 and the BESS is 1,027.5 ha, of which 829.1 ha is BMV. The loss of land as a result of the Scheme, assuming as a worst-case that the tracks, BESS and sub-stations are not restored to comparable ALC quality, will at 28.9ha of BMV land, be a modest proportion of the Order Limits (ES 15.8.65). There is the potential for the land under and around the panels to continue to be farmed during the operational phase. There are no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade. As explained in the response to LIR-NCC-007 the cumulative schemes assessed were identified from a long list which was refined following consultation with the relevant Local Planning Authorities. Those assessed within **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] – Section 15.11** include; 1. EN0110010 High Grove Solar Farm 2. EN0110013 The Droves Solar Farm

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			3. EN0110019 EcoPower Suffolk Solar Cumulatively with the East Pye proposal this amounts to 1% of the agricultural land in the county.
LIR-NCC-010	Strategic and Cumulative Impacts (Impacts)	4.4 In addition to solar development, there are a number of National Grid upgrade projects proposed for Norfolk including Norwich to Tilbury, Grimsby to Walpole and Eastern Green Link 3 and Eastern Green Link 4. Redmere onshore wind farm has recently been proposed in the west of the county and the County Council expects Norfolk to remain a popular location for energy generation projects as long as there is capacity available on the transmission grid.	The Applicant is aware of other projects in the region. The **ES [APP- 042 to 054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. A comprehensive Cumulative Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA Methodology [APP-038]. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES. The Applicant will continue to discuss the list of cumulative schemes with NCC as the examination progresses.
LIR-NCC-011	Strategic and Cumulative Impacts (Impacts)	4.5 The County Council is particularly concerned about the loss of best and most versatile agricultural land. The Planning Statement records that a substantial proportion of the East Pye Solar site would comprise BMV land (78.7%1), and that a non-trivial area would be permanently lost as a result of the scheme. Although much of the agricultural land take is presented as	Under the new Predictive ALC Map for England, 94% of Norfolk's agricultural land is BMV, so the site is not unusually high in BMV. Loss of BMV land is limited to 28.9ha. Land not subject to permanent works will be returned to agricultural use upon decommissioning. Land under and around the panelled areas can potentially be managed by the grazing of sheep. There are no policies or requirements for land to be farmed for food

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		temporary, the anticipated operational life of 60 years means that the effects would be experienced over a very long period for affected communities and farming businesses.	production or at any particular level of intensity, irrespective of ALC grade. Farm businesses are assessed in **ES Chapter 15 [APP-051]**. **ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]** provides details of the effects of the scheme on farm businesses. The land within the Order Limits is currently farmed by a mixture of arable cropping, agri-environmental land management, and areas of outdoor livestock production. Table 15.15 within **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** provides a summary of farm effects, none of the farm businesses will experience a significant effect.
LIR-NCC-012	Strategic and Cumulative Impacts (Impacts)	4.6 The County Council is also concerned that there is no clear strategic framework for the siting of multiple large-scale solar farms across Norfolk. The result is a pattern of cumulative and clustered impacts on particular landscapes, communities and businesses, rather than a managed strategic approach to energy infrastructure delivery.	The Applicant refers to the response provided on this topic in the **Applicant Response to Relevant Representations Part 1 – Local Authorities [PDA-008]** at comment ID NCC-003.
LIR-NCC-013	Strategic and Cumulative Impacts	4.7 Beyond testing the Applicant's cumulative assessment and site selection methodology rigorously, there are no mitigation measures available at this point in the process. The ExA and the secretary of state will have to consider the	The cumulative schemes assessed within Section 15.11 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land – [APP-051]** include: 1. EN0110010 High Grove Solar Farm

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	(Requirements, obligations and other measures)	relationship between East Pye Solar and other solar, grid and energy infrastructure projects in Norfolk and decide what weight to give cumulative impacts. 4.8 The County Council notes that in the decision letter for Beacon Fen (an NSIP solar project in Lincolnshire), the secretary of state afforded great negative weight to the loss of BMV agricultural land, in part due to the cumulative impact of the proposed developments in Lincolnshire2.	2. EN0110013 The Droves Solar Farm 3. EN0110019 EcoPower Suffolk Solar Agricultural land mitigation is outlined in **ES 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 [REP1-058]** and the **Outline SRMP [APP-204]**.
LIR-NCC-014	Landscape and Visual (Summary)	5.1 Norfolk County Council has reviewed the applicant's ES Chapter 7: Landscape and Visual3, together with the supporting methodology, baseline studies, assessment tables, visualisations and associated appendices. The Landscape and Visual Impact Assessment (LVIA) has been prepared using an established methodology based on GLVIA3 and is supported by a substantial evidence base. However, the County Council considers that a number of aspects of the assessment would benefit from further scrutiny and explanation.	The Applicant notes the Authority's response. Further detail is provided in subsequent responses.
LIR-NCC-015	Landscape and Visual	5.2 The scheme would introduce large-scale solar infrastructure across approximately 1,000 hectares of	The Applicant notes the Authority's response.

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	(Summary)	predominantly rural agricultural landscape within South Norfolk, including solar arrays, project substations, a Battery Energy Storage System (BESS), cable infrastructure, security fencing, access tracks and associated development. The applicant's assessment concludes that significant adverse landscape and visual effects would occur during construction and operation, with significant residual effects remaining at Year 15 for a number of landscape and visual receptors.	
LIR-NCC-016	Landscape and Visual (Summary)	5.3 The affected landscape is not nationally designated. However, the baseline assessment identifies qualities including rural character, openness, tranquillity, recreational value, visual connectivity and locally distinctive landscape features. The County Council considers that these characteristics make an important contribution to the quality, experience and appreciation of the local countryside and should be given appropriate weight when assessing landscape value, sensitivity and significance of effects.	The Applicant notes the Authority's response. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices provides a detailed overview of the landscape and visual baseline. These characteristics and qualities have been considered within the assessment.

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LIR-NCC-017	Landscape and Visual (Summary)	5.4 Norfolk County Council recognises the national need for renewable energy infrastructure and the strong policy support for solar energy generation contained within the National Policy Statements. However, the County Council also notes that national policy requires applicants to apply the mitigation hierarchy, minimise harm wherever reasonably practicable and secure appropriate mitigation and environmental enhancement.	The Applicant welcomes the Authority's response regarding recognising the need for renewable energy infrastructure. The Applicant considers the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible.
LIR-NCC-018	Landscape and Visual (Summary)	5.5 While Norfolk County Council broadly agrees with much of the baseline evidence presented within the LVIA, the County Council has concerns regarding the extent to which landscape value, landscape sensitivity, recreational experience and perceptual qualities are reflected in the resulting assessment conclusions. In particular, the County Council considers that greater transparency would be beneficial regarding the exercise of professional judgement where substantial landscape and visual change is identified but significance conclusions are moderated. The relationship between baseline evidence, sensitivity judgements,	The Applicant welcomes the Authority's response regarding agreement with the baseline evidence presented within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices. The Applicant considers **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]** provides detailed reporting and transparency in how professional judgments have informed the overall effects reported for each phase of the Scheme. Baseline evidence is not repeated as this is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**, but judgments regarding value, susceptibility and overall sensitivity are repeated for transparency.

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		mitigation assumptions and residual effects is not always clear.	Where mitigation is relied upon this is clearly set out in the narrative within the description of change. For each receptor the Scheme elements which have an influence on the receptor together with judgments on the resulting scale of change are defined with an overall position on how this effects the overall receptor with reference to its key characteristics or qualities. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**.
LIR-NCC-019	Landscape and Visual (Summary)	5.6 Norfolk County Council is also concerned that many of the reductions in effects predicted between Year 1 and Year 15 rely heavily upon the successful establishment and long-term effectiveness of mitigation planting. While the proposed mitigation strategy is welcomed, the County Council considers that confidence in the predicted outcomes is intrinsically linked to the deliverability, monitoring, maintenance and long-term management of measures that are yet to be fully defined through the detailed Landscape and Ecology Management Plan (LEMP).	The Applicant welcomes the Authority's response regarding the mitigation measures included in the **Green Infrastructure Strategy [REP1-013]**. The Applicant has provided an **Outline LEMP [REP1-064]** establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. The Outline LEMP is supported by the **Green Infrastructure Strategy [REP1-013]**, which provides detail on the proposed landscape and ecological measures across the Scheme which **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices relied upon. The **Outline LEMP [REP1-064]** includes a commitment to providing a LEMP prior to the commencement of any part the Scheme by, or on behalf of, the Applicant. This will be approved by the

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			relevant planning authority pursuant to Requirement 7 in the **Draft DCO [REP1-014]**, and will include: 1. The detailed landscape proposal plans to identify the location, number, species, size, and planting density of any proposed landscape planting and ecological measures. 2. Landscape planting specification including, cultivation, importing of materials and other operations to ensure landscape planting establishment. 3. Implementation timetables for all landscape planting and ecological measures. 4. Management and maintenance timetables for all landscape planting and ecological measures. 5. Monitoring prescriptions for all landscape planting and ecological measures. Requirement 7 states that *"The landscape and ecology management plan must be substantially in accordance with the outline landscape and ecology management plan"* and that the "*landscape and ecological management plan must be implemented as approved*". Therefore both the implementation of the landscaping and its ongoing monitoring and maintenance is secured in the DCO. The approach is

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			consistent with recently consented NSIP solar developments and is considered sufficiently robust.
LIR-NCC-020-022	Landscape and Visual (Summary)	5.7 The County Council considers that particular attention should be given during examination to: • The assessment of landscape value and landscape sensitivity; • The treatment of tranquillity, rural character and other perceptual qualities; • Effects on the setting of villages and rural settlements; • Visual effects arising from substations, the BESS and other built infrastructure; • Impacts on Public Rights of Way (PRoW), the Boudicca Way, Via Beata and other recreational receptors; • Route-wide, sequential and cumulative recreational effects; • The assessment of alternative panel technologies; • The treatment of cumulative effects, including interactions with other	The Applicant notes the Authority's response and provides the following response to the points raised. • The assessment of landscape value and landscape sensitivity **ES Volume 1, Chapter 7 - Landscape and Visual** and specifically **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**, provides details regarding value, susceptibility and overall sensitivity for each landscape receptor. • The treatment of tranquillity, rural character and other perceptual qualities In forming judgments of the sensitivity of the landscape baseline **ES Volume 1, Chapter 7 - Landscape and Visual** and specifically **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119],** provides details regarding perceptual qualities of the baseline conditions. • Effects on the setting of villages and rural settlements The assessment of effects on landscape, includes the district landscape character areas of which the surrounding villages and rural settlements form component features and therefore these are considered within **ES Volume 1, Chapter 7 –**

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		major energy infrastructure proposals; • The long-term effectiveness and deliverability of landscape mitigation; and • The extent to which the scheme contributes towards wider environmental objectives, including those identified within the Norfolk Local Nature Recovery Strategy and the Greater Norwich Green Infrastructure Strategy SPD.	**Landscape and Visual [APP-043]** and associated appendices. In addition, the visual assessment considers visual effects from visual receptors including the surrounding villages. A number of the rural settlements also form Conservation Areas (Brooke, Seething, Saxlingham Green, Saxlingham Nethergate, Hempnall, and Fritton) and have been considered within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. • Visual effects arising from substations, the BESS and other built infrastructure The visual assessment within ES Volume 1**, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from visual receptors as a result of all relevant Scheme elements (including the BESS and substations, and associated infrastructure where appropriate). • Impacts on Public Rights of Way (PRoW), the Boudicca Way, Via Beata and other recreational receptors The visual assessment within ES Volume 1**, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from visual the PRoW network as

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			a result of the Scheme. Furthermore, the PRoW Visual Amenity Assessment is included in **ES Volume 3**, **Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. • Route-wide, sequential and cumulative recreational effects In response to the ExA Q1.11.4 the Applicant has submitted a sequential route assessment at Deadline 2 of circular and combined routes which connect to the local settlements to aid understanding of effects on these. • The assessment of alternative panel technologies **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices, consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 The Scheme [REP1-022**] as a worst case only. Option B Fixed South facing PV arrays have a reduced height at 3.5m and could reduce the theoretical envelope in which visual effects could occur, however it is considered

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			that at 3.5m high Option B would still be visible above managed hedgerows within the landscape. Furthermore, in considering the worst-case scenario the assessment of the Option A: Single-Axis Tracker Panels has considered these at maximum tilt and the maximum height at 4.5m. However, during the midday period (and hours either side) when the sun is at its highest in the sky, the Option A arrays would be horizontal (to maximise their solar gain) and at a reduced height, therefore the scale and visual complexity of the solar arrays would be reduced from that reported. This reduced height would also occur during the hours of darkness. • The treatment of cumulative effects, including interactions with other major energy infrastructure proposals The Applicant is aware of other projects in the region. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects as defined within the Chapter. • The long-term effectiveness and deliverability of landscape mitigation Please see the Applicants response to LIR-NCC-019.

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			• The extent to which the scheme contributes towards wider environmental objectives, including those identified within the Norfolk Local Nature Recovery Strategy (LNRS) and the Greater Norwich Green Infrastructure Strategy SPD Whilst the Scheme's design evolution has progressed prior to the publication of the Local Nature Recovery Strategy, the embedded design principles adopted and detailed within **Design Approach Document [APP-212]** have been applied to retain, protect and enhance ecological assets. The LNRS aims to connect, expand and enhance areas of arable field margins, enhance and restore hedgerows and hedgerow trees, promote effective management techniques and controlled grazing regimes, incorporate mosaic features within habitats, and restore farmland ponds and improve riparian habitats alongside woodland and scrub creation for defined areas within the Order Limits. With an environmental led approach which is based on an understanding of place and baseline conditions, proposed measures as shown on the **Green Infrastructure Strategy [REP1-013]** and documented in the **Outline LEMP [REP1-064]** align to LNRS strategies including new deciduous woodland creation, scrub creation, neutral grassland creation and provision of a mosaic of habitats. Where possible,

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			areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the proposals. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]**. The Greater Norwich Green Infrastructure Strategy, aims to address deficiencies in accessible greenspace, strengthen the network of greenways, increase green cover in the built environment, strengthen habitat connectivity and support urban nature recovery, and embed GI into new development. The **Green Infrastructure Strategy [REP1-013]** supports the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure assets through new woodland belts and native tree planting to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity, and support climate change resilience.
LIR-NCC-023	Landscape and Visual (Summary)	5.8 Overall, Norfolk County Council considers that the scheme would result in a substantial and long-term change to the character and experience of parts of the	The Applicants notes the Authority's comment and draws attention to the Applicants responses to LIR-NCC-018 and LIR-NCC-019.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		local countryside. While landscape and visual effects are not unexpected for infrastructure of this scale and are unlikely in themselves to outweigh the overall benefits of the scheme, the County Council considers that further scrutiny of the assessment, mitigation strategy and long-term management arrangements is necessary to ensure that local landscape, visual and recreational effects are fully understood and appropriately addressed.	
LIR-NCC-024	Landscape and Visual (Policy Context)	5.9 The principal policies governing the consideration of landscape and visual effects are contained within Section 5.10 (Landscape and Visual) of NPS EN-1 and Paragraphs 2.10.85 to 2.10.93 of NPS EN-3 for Renewable Energy Infrastructure. At a strategic level, the NPSs recognise that adverse landscape and visual effects are often unavoidable consequences of nationally significant energy infrastructure and should not necessarily prevent development consent being granted. However, national policy is equally clear that applicants must apply the mitigation hierarchy and demonstrate that adverse effects have been avoided, reduced and mitigated wherever reasonably practicable.	The Applicant considers the mitigation hierarchy has been applied. 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 integration 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 **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP**

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			[REP1-062] that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014].** The Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices 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.
LIR-NCC-025	Landscape and Visual (Policy Context)	5.1 Paragraph 5.10.6 of EN-1 requires projects to be carefully designed with the aim of minimising harm to landscape character and visual amenity and securing reasonable mitigation where appropriate. The emphasis of policy is therefore not solely on identifying effects, but on demonstrating that the design process has responded positively to landscape constraints and opportunities. 5.1 EN-1 also recognises that major infrastructure projects can deliver wider environmental gains in addition to mitigating adverse effects. Paragraph 4.6.13 identifies landscape enhancement, increased access to natural greenspace and the enhancement, expansion and provision of trees and woodlands as examples of wider environmental benefits	The **Green Infrastructure Strategy [REP1-013],** secured by Requirement 7 of the **Draft DCO [REP1-014]** presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. The mitigation & enhancement measures are cognisant of the project design principles and best practice, and they respond to the local context and are embedded into the design for managing environmental effects. Areas for mitigation and enhancement on which the Environmental Impact Assessment relies are defined on the Indicative Masterplan as provided in **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025]** and secured by Work No 7 as defined in the **Design Principles, Parameters and Commitment Document [REP1-078].** The **Design Approach Document [APP-212]** sets out how the Scheme design has responded to environmental sensitivities.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		that development may provide. For the County Council, this is particularly relevant given the size and scale of the scheme and the opportunity to secure meaningful landscape, biodiversity and recreational enhancements alongside mitigation measures.	Proposed mitigation measures as shown on the **Green Infrastructure Strategy [REP1-013],** include new soft landscape planting to provide visual screening, break up the extent of visible infrastructure, and link existing habitats to provide enhanced green infrastructure and biodiversity connectivity. The approach seeks to maximise green infrastructure which will connect to and provide links between existing features, providing structural diversity and maximising biodiversity benefits. Measures also include grassland creation, hedgerows both new planting and reinforcement of existing features, restoring key hedgerows to improve biodiversity and reinforce landscape characteristic features together with the creation new woodland belts and native tree planting (a mixture of natural regeneration and planting). In summary the Applicant considers the green infrastructure strategy positively respond to the character of the Sites, informed by Natural England National Character Area Profiles and South Norfolk Local Landscape Character Assessment including the character of the River Valleys. The proposals seek to retain existing vegetation, and where possible enhance through supplementary planting to aid the integration of the Scheme within the environment and positively respond to the characteristics of the surrounding landscape. Overall the Scheme supports the objectives of Norfolk's Green Infrastructure

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Strategy, creating green infrastructure assets for climate change resilience and enhancing biodiversity. The **Biodiversity Net Gain Report [APP-218]** illustrates that in practice, based on the baseline habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the Outline LEMP, the Scheme has committed to deliver BNG, including: • 30% gain for habitats; • 25% gain for hedgerows; and • 10% gain for watercourses. These BNG units are secured via Requirement 9 in the **Draft DCO [REP1-014]**. Public amenity has also been considered when planning and considering the location and type of habitats to establish. This consideration has also included provision for new community accessible spaces and permissive paths including at Sites 8b, 7f, 4b and 10b. Other environmental measures include ghost pond restoration, skylark mitigation and creation of arable field margins as a priority habitat. The creation of field-edge/field-corner habitats such as grass margins, hedges and ditches and trees will support rare arable weeds and farmland bird species. Maintaining isolated ponds and reinstating ghost ponds, which are a characteristic feature of the clay plateau for their

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			landscape and biodiversity value, particularly their populations of great, crested newt will also provide an environmental enhancement. Overall, this provision of habitats will strengthen corridors through the farmed landscape; allowing the movement of wildlife and enhancement of biodiversity. As set out within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**, the Applicant's position is that the Scheme complies with Paragraphs 5.10.6 and 4.6.13 of NPS EN-1.
LIR-NCC-026	Landscape and Visual (Policy Context)	5.12 Although the scheme is not located within a nationally designated landscape, Paragraph 5.10.12 of EN-1 recognises that landscapes may be highly valued for reasons beyond national designation. Norfolk County Council therefore considers that the absence of statutory designation should not diminish consideration of locally distinctive landscape character, tranquillity, recreational value, visual amenity and other experiential qualities identified within the baseline assessment. While such landscapes would not in themselves justify refusal of development consent, they should inform decisions regarding design, mitigation, enhancement and compensation.	As identified in LIR-NCC-018, the Applicant welcomes confirmation that the baseline evidence presented within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices is broadly agreed including the identification of features of higher value. The Applicants position as set out in the **Design Approach Document [APP-212]**, is that the design evolution has been an **environmentally led approach**, where infrastructure has been progressively refined to avoid, reduce and mitigate potential effects on landscape character (and features of value), ecology, heritage assets, flood risk, agricultural land, recreation and residential amenity. Good design has been embedded in the design process of the Scheme as a whole as it has evolved from project inception through statutory consultation

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			and up to DCO submission. Design has been considered on a site-by-site basis with the application of the design principles and further supported by the Environmental Impact Assessment process which has involved environmental studies and surveys to define the baseline and constraints in the local context and adopt a robust approach to the Scheme design. This Approach considers the mitigation hierarchy with the design focused on avoiding environmental constraints as far as practicable, which responds positively to local context and receptors. In summary the Applicant considers that the landscape and its characteristics and qualities have informed the design decision making process. As set out within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**, the Applicant's position is that the Scheme complies with Paragraphs 5.10.12 of NPS EN-1.
LIR-NCC-027	Landscape and Visual (Policy Context)	5.13 Paragraph 5.10.14 of EN-1 requires the Secretary of State to consider whether visual effects on sensitive receptors outweigh the benefits of a proposal. Given the national need case for renewable energy infrastructure and the wider policy support for solar energy generation, it is unlikely that landscape and visual effects alone would outweigh the benefits of the scheme. However, this does not provide	The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from all relevant Scheme elements. 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**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		an exemption from the mitigation hierarchy and does not lessen the importance of securing robust mitigation where significant residual effects remain. 5.14 The policy approach to assessment is further set out within paragraphs 5.10.16 to 5.10.25 of EN-1, which establish the key principles informing Landscape and Visual Impact Assessment (LVIA), including consideration of landscape character, landscape value, visual amenity, cumulative effects and mitigation. These principles form the basis of the applicant's assessment methodology and provide the framework against which the robustness of the LVIA should be considered.	**Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Development within environmentally sensitive locations has been minimised through the application of offsets and buffers including to Public Rights of Way (PRoW), and residential properties, as set out in the **Design Principles, Parameters and Commitments [REP1-078]**. Bespoke stand-off distances have been incorporated around residential receptors to reduce visual effect on residential receptors, as illustrated on the **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025].** 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 as a part of the design wherever practicable and were a key consideration in the design process and minimum offset distances for retained trees and hedgerows is defined to ensure this. Mitigation identified as shown on the **Green Infrastructure Strategy [REP1-013]** includes strengthening 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 provide visual screening.

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			The implementation, management and monitoring of landscape mitigation during construction and operation are secured through the **Outline LEMP [REP1-064],** secured by a Requirement in the **Draft DCO [REP1-014].** 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 [REP1-064**]. 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 described above has sought to minimise impacts as far as practicable. As per Requirement 17 of the **Draft DCO [REP1-014]**, no part of the authorised development may commence until a public right of way and permissive path management plan for

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			that part has been submitted to and approved by the relevant planning authority, and the public right of way and permissive path management plan must be substantially in accordance with the outline public right of way and permissive path management plan. The Applicant acknowledges that significant residual effects on landscape character and visual amenity remain following mitigation. As set out within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**, the Applicant's position is that the Scheme complies with Paragraphs 5.10.16 to 5.10.25 of NPS EN-1.
LIR-NCC-028	Landscape and Visual (Policy Context)	5.15 Specific policy for solar development is contained within NPS EN-3. Paragraphs 2.10.85 to 2.10.93 require applicants to undertake an LVIA and, where appropriate, provide visualisations illustrating effects on landscape character, valued views, residential amenity and recreational receptors. EN-3 also recognises that large-scale solar farms can occupy extensive areas of open countryside and may exert a wider visual influence than some other forms of energy infrastructure. The NPS therefore highlights the importance of considering cumulative and sequential effects, a matter	Compliance with Paragraphs 2.10.85 to 2.10.93 of NPS EN-3 is set out within the **Policy Compliance Document [REP1-076]** and the **Planning Statement [REP1-074]**. The Applicant notes the Authority's response. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices provides a detailed overview of the landscape and visual baseline, and the Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines and it has informed the iterative design process, is robust and appropriate for the assessment of the Scheme. It is supported by a series of **ZTV**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		that Norfolk County Council considers particularly relevant in this case.	**analysis [APP-070 to APP-080**], and **visualisations [APP-136 to APP-146].** The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from visual receptors including the PRoW network as a result of the Scheme. Furthermore, the PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. In response to the ExA Q1.11.4 the Applicant is submitting a sequential assessment of key PRoWs and recreational routes at Deadline 2. This will supplement the representative view locations assessment and provide additional information on the changing visual experience along routes where users pass through or alongside the Scheme. With regard to cumulative effects the Applicant is aware of other projects in the region, and **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** presents an assessment of the cumulative effects of

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			multiple existing and/or approved developments generating cumulative effects as defined within the Chapter.
LIR-NCC-029	Landscape and Visual (Policy Context)	5.16 In addition to the NPSs, regard should be had to the National Planning Policy Framework (NPPF, August 2026). While the NPSs provide the primary basis for decision-making for NSIPs, the NPPF contains important principles relating to design quality, environmental enhancement and sustainable development. The NPPF identifies an environmental objective of sustainable development which includes protecting and enhancing the natural, built and historic environment, improving biodiversity and making prudent use of natural resources.	Compliance with the NPPF has been considered within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**, updated at Deadline 1 to reflect the revised NPPF published in August 2026. Compliance with the economic, social, and environmental objectives of sustainable development are set out within the **Policy Compliance Document [REP1-076].**
LIR-NCC-030	Landscape and Visual (Policy Context)	5.17 Particular relevance is attached to Chapter 14 (Achieving Well-Designed Places) and Chapter 19 (Conserving and Enhancing the Natural Environment), which together support development that responds positively to local context, reinforces local character and contributes to environmental enhancement.	The **Green Infrastructure Strategy [REP1-013]** presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. The mitigation & enhancement measures are cognisant of the project design principles and best practice, and they respond to the local context and are embedded into the design for managing environmental effects. Areas for mitigation and enhancement on which the Environmental Impact Assessment relies are defined

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			on the Indicative Masterplan as provided in **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025]** and secured by Work No 7 as defined in the **Design Principles, Parameters and Commitment Document [REP1-078].** Proposed measures include new soft landscape planting to provide visual screening, break up the extent of visible infrastructure, and link existing habitats to provide enhanced green infrastructure and biodiversity connectivity. The approach seeks to maximise green infrastructure which will connect to and provide links between existing features, providing structural diversity and maximising biodiversity benefits. Measures also include grassland creation, hedgerows both new planting and reinforcement of existing features, restoring key hedgerows to improve biodiversity and reinforce landscape characteristic features together with the creation new woodland belts and native tree planting (a mixture of natural regeneration and planting). In summary the Applicant considers the green infrastructure strategy positively respond to the character of the Sites, informed by Natural England National Character Area Profiles and South Norfolk Local Landscape Character Assessment including the character of the River Valleys. The proposals seek to retain existing vegetation, and where possible enhance through supplementary planting to aid the

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			integration of the Scheme within the environment and positively respond to the characteristics of the surrounding landscape. Overall the Scheme supports the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure assets for climate change resilience and enhancing biodiversity.
LIR-NCC-031	Landscape and Visual (Policy Context)	5.18 The Planning Practice Guidance (PPG) on the Natural Environment similarly recognises that green infrastructure delivers multiple environmental, social and economic benefits. The PPG emphasises that green infrastructure should not be regarded solely as mitigation but should form an integral part of development proposals, delivering wider benefits including landscape enhancement, ecological connectivity, climate resilience and recreational access.	The Applicants position as set out in the **Design Approach Document [APP-212]**, is that the design has been environmentally led and alongside providing mitigation the **Green Infrastructure Strategy [REP1-013]** supports enhancement and biodiversity net gain. The strategy responds to the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure assets through new woodland belts and native tree planting to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity, and supports climate change resilience. Proposed measures align to LNRS strategies including new deciduous woodland creation, scrub creation, neutral grassland creation and provision of a mosaic of habitats. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the Green Infrastructure Strategy. The **Biodiversity Net Gain Report [APP-218]** illustrates that in practice, based on the baseline

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			habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the **Outline LEMP [REP1-064]**, the Scheme has committed to deliver BNG, including: • 30% gain for habitats; • 25% gain for hedgerows; and • 10% gain for watercourses. Public amenity has also been considered when planning and considering the location and type of habitats to establish. This consideration has also included provision for new community accessible spaces and permissive paths including at Sites 8b, 7f, 4b and 10b.
LIR-NCC-032	Landscape and Visual (Policy Context)	5.19 At the local level, relevant policies within the Greater Norwich Local Plan include Policy 3 (Environmental Protection)5 and Policy 4 (Enhancement and Strategic Infrastructure)6. Relevant policies within the South Norfolk Development Management Policies Document7 include Policies DM1.4, DM3.8, DM3.13, DM4.4, DM4.5, DM4.8, DM4.9 and DM4.10. While these policies do not form part of the primary decision-making framework for the application, they provide important evidence regarding locally valued landscape characteristics,	Compliance with South Norfolk Development Management Policies Document, Policies DM1.4, DM3.8, DM3.13, DM4.4, DM4.5, DM4.8, DM4.9 and DM4.10 is set out in the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**.

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		environmental quality objectives and design expectations within the host authority area.	
LIR-NCC-033	Landscape and Visual (Policy Context)	5.20 Norfolk County Council has also had regard to the Norfolk Local Nature Recovery Strategy (NLNRS), prepared under the Environment Act 2021. The LNRS identifies priorities for habitat creation, ecological connectivity, nature recovery and landscape-scale environmental enhancement across Norfolk. The County Council considers the LNRS to be a particularly important local evidence base when considering how landscape mitigation, biodiversity enhancement and green infrastructure proposals associated with the scheme could contribute to wider environmental objectives. 5.21 Similarly, the County Council has had regard to the Greater Norwich Green Infrastructure Strategy SPD (March 2026)9, which promotes the protection, enhancement and connectivity of multifunctional green infrastructure assets. The strategy highlights the importance of accessible greenspace, biodiversity networks, recreational connectivity and	Whilst the Schemes design evolution has progressed prior to the publication of the Local Nature Recovery Strategy, the embedded design principles adopted and detailed within **Design Approach Document [APP-212]** have been applied to retain, protect and enhance ecological assets. The LNRS aims to connect, expand and enhance areas of arable field margins, enhance and restore hedgerows and hedgerow trees, promote effective management techniques and controlled grazing regimes, incorporate mosaic features within habitats, and restore farmland ponds and improve riparian habitats alongside woodland and scrub creation for defined areas within the Order Limits. With an environmental led approach which is based on an understanding of place and baseline conditions, proposed measures align to LNRS strategies including new deciduous woodland creation, scrub creation, neutral grassland creation and provision of a mosaic of habitats. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the **Green Infrastructure Strategy [REP1-013].** This not only contributes

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		landscape character, and provides a useful framework for evaluating opportunities for environmental enhancement beyond mitigation. 5.22 Taken together, the NPSs, NPPF, PPG, NLNRS, Greater Norwich Green Infrastructure Strategy and local planning policy framework establish a consistent expectation that nationally significant infrastructure should seek not only to minimise adverse landscape and visual effects, but also to secure wider environmental gains. In the County Council's view, this includes opportunities for landscape enhancement, nature recovery, strengthened green infrastructure networks, improved recreational provision, biodiversity gains and reinforcement of local landscape character wherever feasible.	towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]**. The Greater Norwich Green Infrastructure Strategy, aims to address deficiencies in accessible greenspace, strengthen the network of greenways, increase green cover in the built environment, strengthen habitat connectivity and support urban nature recovery, and embed GI into new development. The **Green Infrastructure Strategy [REP1-013]** supports the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure assets through new woodland belts and native tree planting to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity, and support climate change resilience. Therefore, the Applicant's position is that the Scheme complies with the NPS, NPPF, PPG, and positively responds to the LNRS and Greater Norwich Green Infrastructure Strategy.
LIR-NCC-034	Landscape and Visual	5.23 The scheme is located within National Character Area 83: South Norfolk and High Suffolk Claylands and affects six district Landscape Character Areas (LCAs): LCA A1 Tas Rural River Valley, LCA B1 Tas	The Applicant welcomes the Authority's response regarding agreement with the baseline evidence presented within **ES Volume 1, Chapter 7 -**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Landscape Context)	Tributary Farmland, LCA B4 Waveney Tributary Farmland, LCA B5 Chet Tributary Farmland, LCA C2 Thurlton Tributary Farmland with Parkland and LCA E2 Great Moulton Plateau Farmland. The applicant assesses three of these LCAs as having high sensitivity and three as having medium sensitivity. 5.24 Although the scheme is not located within a nationally designated landscape, the baseline assessment identifies a countryside characterised by agricultural land, rural settlement patterns, tributary river valleys, extensive hedgerow networks, areas of tranquillity and an extensive Public Rights of Way network. Recreational routes including the Boudicca Way and Via Beata are identified as high-sensitivity receptors. 5.25 Norfolk County Council broadly agrees with the applicant's description of the receiving landscape. However, the County Council considers that the LVIA does not always explain how the qualities identified within the baseline evidence have informed the subsequent assessments of value, sensitivity and significance.	**Landscape and Visual [APP-043]** and associated appendices. The Applicant considers baseline evidence is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**, regarding value, susceptibility and overall sensitivity and **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]** provides detailed reporting and transparency in how professional judgments have informed the overall effects reported for each phase of the Scheme. For each receptor the Scheme elements which have an influence on the receptor together with judgments on the resulting scale of change are defined with an overall position on how this effects the overall receptor with reference to its key characteristics or qualities. This includes the Boudicca Way and Via Beata which are both considered. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**. Please see the Applicants response to LIR-NCC-035 to LIR-NCC-039 with regard to judgements of value, sensitivity and significance.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
LIR-NCC-035	Landscape and Visual (Impacts – Landscape Value)	5.26 Norfolk County Council notes that the assessment places considerable weight on the absence of national or local landscape designation when determining landscape value. 5.27 While designation remains an important consideration, the Landscape Institute Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations makes clear that landscape value may arise from a range of natural, cultural, perceptual and experiential qualities and is not dependent upon formal designation. 5.28 The applicant's own baseline assessment identifies a number of characteristics that commonly contribute to landscape value, including tranquillity, rural character, recreational use, visual connectivity, distinctive tributary valley landscapes, mature vegetation, local distinctiveness and sense of place. These qualities are recurring themes throughout the Landscape Baseline and are frequently identified as important characteristics of the receiving landscape. 5.2 The County Council is not persuaded that these qualities are consistently	The Applicant considers **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** is robust and follows the methodology set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118**], which considers the Landscape Institute Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations**.** Whilst the absence of national or local designation does influence value as established in Table 7.1.2 a range of components are considered which also influence value. Where appropriate, key individual components of the landscape, including particular features, notable aesthetic and perceptual qualities, are considered in terms of the importance in their own right, including whether or not they can realistically be replaced. With reference to Table 7.1.3 a judgment is made with regard to the value of the landscape receptor on a scale of high to low. The presence of one or more characteristics that positively contribute to value does not automatically result in a high value for the individual receptor and a balanced view is taken Baseline evidence is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		reflected in the subsequent landscape value assessments. In several instances, the narrative places considerable emphasis on the absence of statutory designation, whereas the influence of experiential, perceptual and recreational qualities appears less evident in the final conclusions.	Notwithstanding the Applicant position in response to the queries raised the Applicant will provide further detail and clarity at Deadline 3.
LIR-NCC-036	Landscape and Visual (Impacts – Landscape Value)	5.30 The County Council's concern is not that undesignated landscapes should be treated as designated landscapes, but that landscapes may be locally valued for reasons that are not captured through formal designation. Where such qualities are important characteristics of the baseline landscape, Norfolk County Council considers that they should be clearly reflected in the assessment of value and susceptibility. 5.31 Where landscape value and susceptibility are understated, there is a consequential risk that overall sensitivity and, ultimately, significance of effect may also be understated.	The Applicant considers **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** is robust and follows the methodology set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]** and sensitivity is appropriately considered within the assessment.
LIR-NCC-037	Landscape and Visual	5.32 Norfolk County Council accepts that the assessment methodology is generally consistent with GLVIA3 and recognised professional practice. However, the County	The Applicant notes the Authority's response. The assessment defines what factors have influenced landscape value and landscape susceptibility. The

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Landscape Susceptibility)	Council considers that there is a notable tension between aspects of the baseline evidence and some of the resulting sensitivity conclusions.	Applicant previously confirmed the approach to defining sensitivity in the **Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]** NCC 019.
LIR-NCC-038	Landscape and Visual (Impacts – Landscape Susceptibility)	5.33 The baseline repeatedly identifies characteristics commonly associated with increased susceptibility to large-scale solar development, including: • open agricultural landscapes • expansive views • visual connectivity • perceived tranquillity • limited urban influence • recreational use and • distinctive rural character. 5.34 These characteristics are particularly evident within the Tas, Waveney and Chet tributary landscapes, together with the Great Moulton Plateau Farmland and Thurlton Tributary Farmland with Parkland LCAs. 5.35 Against that baseline, the County Council considers it is not always apparent how some receptors ultimately arrive at	The Applicants notes the Authority's comments but disagrees with the position that the landscape consistently has increased susceptibility to the type of development proposed. As part of the LVIA process a range of attributes (scale, enclosure, landform, pattern, landcover, human influence, perceptions, visual qualities, intactness etc) are considered when deriving susceptibility and a balanced view is taken to derive an overall level, in accordance with Table 7.1.4 of **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118**]. The presence of one or more attributes that contribute to increased susceptibility does not automatically result in a high susceptibility for the individual receptor and a balanced view is taken Baseline evidence is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**. Notwithstanding the Applicant position in response to the queries raised the Applicant will provide further detail and clarity at Deadline 3.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		medium sensitivity conclusions. While professional judgement is an inherent component of LVIA practice, the relationship between the evidence presented and the final sensitivity conclusions is not always transparent. 5.36 Particular concern is had in regard to the extent to which the following factors have influenced sensitivity judgements: • tranquillity and perceptual qualities; • openness and skyline characteristics; • recreational function; • landscape condition and intactness; • local distinctiveness; • community value; and • susceptibility to the introduction of large-scale energy infrastructure. 5.37 Norfolk County Council considers that some landscapes may exhibit a greater susceptibility to change than is reflected in parts of the assessment.	
LIR-NCC-039	Landscape and Visual	5.38 The County Council recognises that significance is not derived through a	The Applicant considers **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices provide detailed reporting and

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Assessment of Magnitude and Significance)	mechanical process but through informed professional judgement. 5.39 However, Landscape Institute TGN 20/01 emphasises that the exercise of professional judgement should be transparent and clearly evidenced. The County Council considers that there are several instances where substantial landscape change is identified, but the rationale for the resulting significance conclusions is not fully clear. 5.40 This is particularly relevant where reductions in effects rely heavily upon assumptions regarding future woodland, hedgerow and screening planting. In Norfolk County Council's view, sensitivity and significance should primarily reflect existing landscape conditions rather than anticipated future mitigation performance.	transparency in how professional judgments have informed the overall effects reported for each phase of the Scheme. The approach and judgments align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**. This defines sensitivity of the existing receptors, and magnitude of change is reported for a series of development phases and an overall position of the level of significance for each receptor. The reported significance is a combination of the preceding factors on which clear judgments are provided. The year 15 and decommissioning scenarios consider the presence of mitigation measures as these measures will be present at these periods. The **Green Infrastructure Strategy [REP1-013]** presents the range of environmental mitigation and enhancement areas. Areas for mitigation and enhancement on which the Environmental Impact Assessment relies are defined on the Indicative Masterplan as provided in **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025]** and secured by Work No 7 as defined in the **Design Principles, Parameters and Commitment Document [REP1-078].** The implementation, management and monitoring of landscape mitigation during construction and operation are secured through the **Outline LEMP**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			[REP1-064], secured by a Requirement in the **Draft DCO [REP1-014].** However, the construction and year 1 phases do not consider this mitigation as measures will not be established during these periods. This approach therefore represents a worst-case assessment scenario. This is a standard approach across LVIA and accords with best practice GLVIA3 guidance.
LIR-NCC-040	Landscape and Visual (Impacts – Landscape Effects)	5.41 The applicant identifies significant adverse landscape effects during construction and acknowledges that the scheme would introduce substantial change into the receiving landscape during operation. Significant residual effects remain at Year 15 for a number of receptors, including: • LCA B1 Tas Tributary Farmland; • LCA C2 Thurlton Tributary Farmland with Parkland; LCA E2 Great Moulton Plateau Farmland; • Site 1; • Site 7; • Site 8; and • The BESS Site.	The Applicant notes the Authority's response.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		5.42Norfolk County Council broadly agrees that these locations are likely to experience some of the most marked landscape effects.	
LIR-NCC-041	Landscape and Visual (Impacts – Landscape Effects)	5.43 The County Council also notes that the scheme would introduce extensive solar arrays, substations, security infrastructure, fencing and associated development into landscapes that are currently characterised by agricultural land use and dispersed rural settlement patterns. The resulting change is not simply visual in nature but represents a fundamental alteration in landscape character and landscape experience. 5.44 While mitigation planting may reduce visibility over time, Norfolk County Council does not consider that planting can fully recreate existing characteristics such as openness, expansive views, rurality and tranquillity. These attributes are inherent aspects of the existing landscape resource and, once altered, may take many years to re-establish, if they can be recreated at all.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has considered the introduction of the Scheme and its elements into the landscape and effects on landscape character including those prior to and following establishment of the proposed mitigation has been appropriately assessed.
LIR-NCC-042	Landscape and Visual	5.45 Norfolk County Council notes that the Order Limits are located in close proximity to a number of settlements, including (but not limited to) Hempnall, Brooke,	The Applicant notes the Authority's response.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Effects on the Setting of Villages and Settlements)	Saxlingham Green, Saxlingham Nethergate, Tasburgh, Long Stratton, Fritton, Pulham Market and Shotesham. These settlements derive an important component of their rural setting and local identity from their relationship with the surrounding agricultural landscape, tributary valleys, hedgerow networks and open countryside.	
LIR-NCC-043	Landscape and Visual (Impacts – Effects on the Setting of Villages and Settlements)	5.46 Norfolk County Council considers that effects on settlement setting extend beyond views from individual properties. The introduction of extensive solar arrays, substations, security fencing, the BESS and associated infrastructure has the potential to alter the experience of approaching and leaving settlements, affect the relationship between settlements and the wider countryside, and influence perceptions of rurality, openness and local distinctiveness. 5.47 While the LVIA assesses visual effects on individual receptors, the County Council would welcome greater explanation regarding how changes to the wider landscape context and settlement setting have been considered, particularly where multiple development parcels occur	The assessment of effects on landscape, includes the district landscape character areas of which the surrounding villages and rural settlements form component features and therefore these are considered within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. In addition, the visual assessment considers visual effects from visual receptors including the surrounding villages. A number of the rural settlements also form Conservation Areas (Brooke, Seething, Saxlingham Green, Saxlingham Nethergate, Hempnall, and Fritton) and have been considered within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		in close proximity to villages or where settlement character is strongly influenced by the surrounding rural landscape.	
LIR-NCC-044	Landscape and Visual (Impacts – Effects on the Setting of Villages and Settlements)	5.48 Additionally, Norfolk County Council notes that it previously expressed a preference for the alternative southern location for the National Grid Substation during consultation. The adopted location at Site 1B places the National Grid Substation and associated overhead line diversion infrastructure in closer proximity to Great Moulton. The County Council remains concerned that the landscape and visual implications for the setting of the village, together with the cumulative influence of the substation, pylons and associated infrastructure, warrant careful consideration during examination.	The Applicant refers to the response provided at comment IDs NCC-004 and NCC-005 of the **Applicant's Response to Relevant Representations Part 1 – Host and Neighbouring Local Authorities [PDA-008]** regarding the options for the location of the National Grid Substation. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has considered the introduction of the Scheme and its elements including the National Grid substation into the landscape and effects on landscape character and visual amenity including those prior to and following establishment of the proposed mitigation has been appropriately assessed. The chosen location for the National Grid Substation avoids major designated areas of ecological or cultural importance, with only limited priority habitats and no heritage assets, County Wildlife Sites or Ancient Woodland present within the Site or immediately adjacent. The National Grid Substation and overhead lines would therefore avoid areas of high amenity, cultural, and scientific value in line with the Holford / Horlock Rules and NPS EN-5. The approach to the placement of the preferred National Grid Substation and development at Site 1

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			also avoided a PRoW diversion and avoided flood risk constraints associated with the previous option. Whilst the preferred location was geographically closer to Great Moulton compared to Option 1 (to the south of Hundred Lane), it was considered that the screening provided by the existing boundary vegetation in the north western part of Sub-Site 1B reduced visibility of the substation and allowed opportunity for further reinforcement of this vegetation to enhance visual screening. By maintaining the location of the National Grid Substation in close proximity to the existing transmission line, the Applicant has sought to limit the extent of overhead line diversion, thereby reducing the potential environmental and landscape impacts in proximity to areas of amenity value and settlements and avoiding areas of scientific interest. Works in connection with the existing 400kV overhead line would not be located within internationally or nationally designated areas of the highest amenity, and the overhead line would not be routed through any residential settlement.
LIR-NCC-045	Landscape and Visual (Impacts – Substations, Grid	5.49 While solar arrays occupy the greatest proportion of the order limits, Norfolk County Council considers that some of the most substantial landscape and visual effects may arise from the built	The Applicant notes the Authority's response. The Applicants position is that Schemes design has been subject to significant constraint-led refinement through the iterative evidence-led design process to

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Infrastructure and Built Elements)	elements of the scheme rather than the panels themselves. 5.50 This is particularly relevant in relation to: • the BESS • project substations • National Grid infrastructure • security fencing • lighting • associated plant and equipment and • other operational development. 5.51 Unlike solar arrays, these elements introduce a distinctly engineered and industrial character into landscapes that are presently agricultural in nature.	minimise effects on the environment, as set out within the **Design Approach Document [APP-212]**. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices has considered the introduction of the Scheme and its built elements into the landscape and effects on landscape character and visual amenity are assessed including those prior to and following establishment of the proposed mitigation. The following provides a high-level summary on the approach for each of the built elements highlighted by the Authority. <u>BESS</u> **Section 6.6** of **Statement of Need [APP-206]** explains for the BESS facility that grouping in one (or a small number of) location(s) together with substations concentrates landscape and visual effects in a defined area. Being located close to the grid substation also means that line losses associated with power flows between the BESS and the grid may be reduced. Furthermore, the BESS and substations are likely to require regular maintenance, and access must be readily available throughout the operational life of a scheme. Project Level Design Principle 2.8, as set out in the **Design Approach Document [APP-212]**. states that 'Careful siting of infrastructure and landscape buffers

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			to minimise impact on recreational and residential amenity, where practicable'. In relation to the BESS minimum offsets to the PRoW of 30m has been applied. For Hundred Lane - Great Moulton RB19 to the north this offset ranges between 40-50m and for Tivetshall St Margaret FP3 30 ranging between 35 and 50m. These offsets provide opportunity for tree belt planting as identified on the **Green Infrastructure Strategy [REP1-013]** which will help reduce visibility of the Scheme from these receptors. Proposed landscape measures including reinforcing existing features will provide visual screening of the Scheme elements at this location, and aid integration of the Scheme into the landscape. These measures would provide some beneficial aspects including enhancement of the landscape character through reinforcement of woodland belts whilst supporting habitat connectivity and biodiversity gains, which respond to IGP Design Principles 2.1, 2.2, 2.3 and 2.4. <u>Project Substations</u> Substations are needed to facilitate the flow of electricity from the panels, where they are generated, through to the PoC with the grid. Substations are a common feature of all large-scale solar developments, however because different developments have different layouts, substation configurations between schemes can be different.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Up to three 400kV Project Substations are proposed to facilitate the export of electricity from the Scheme to the new National Grid Substation (**ES Volume 1, Chapter 4 - The Scheme [REP1-022]).** The 400kV Project Substations are located in the BESS Site, Sub-Site 5A and Sub-Site 1B. Up to three 132kV Substations will be located across the Order Limits to collect energy from the Solar PV Arrays and convert the energy to 132kV**.** The 132kV Project Substations are located in, Sub-Site 4B, 7F, and 10C. Each Project substation aligns the minimum offset distances, and at each location the substation location has been micro sited with reference to the Project Level Design Principles to reduce effects. The project Substation in the BESS Site accord with Project Level Design Principles as set out in **Design Approach Document [APP-212]** including: • 2.1 through locating adjacent to existing vegetation features and reinforcing these to reflect existing characteristic features and aid landscape integration, • 2.2 through retaining and enhancing vegetation as shown on the **Green Infrastructure Strategy [REP1-013]**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			• 2.3 and 2.4 through creation of new tree planting which responds to Norfolk's Green Infrastructure Strategy • 2.8 to minimise effects on amenity by offsets to nearby residential and recreational receptors • 3.2 and 3.3 strengthening existing landscape features and improving connectivity between existing features through creation of new woodland and tree belts responding to the local recovery network strategy and claylands initiative • 5.4 avoiding routing of access from local villages including Great Moulton with access from Station Road to the south The project Substation in Sub-Site 5A accords with Project Level Design Principles including: • 2.1 through locating adjacent to existing vegetation features and reinforcing these to reflect existing characteristic features and aid landscape integration, • 2.2 through retaining and enhancing vegetation as shown on the **Green Infrastructure Strategy [REP1-013]** • 2.3 and 2.4 through creation of new hedgerows with trees which respond to Norfolk's Green Infrastructure Strategy

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			• 2.7 considering heritage assets by applying offsets from St Catherines (Grade I) Church and Fritton Conservation Area • 2.8 to minimise effects on amenity by offsets to nearby residential (on the Street and the B1257) and recreational receptors (PRoW within Site 5) • 2.9 consideration of the PRoW network through avoiding development in the southeast of Site 5 (5B where there is a concentration of PRoW and maximising distance between the substation and the PRoW network to the east (through Site 5A) and west (on Boylandhall Lane) • 3.2 and 3.3 strengthening existing landscape features and improving connectivity between existing features through creation of new hedgerow, woodland and tree belts responding to the local recovery network strategy and claylands initiative • 3.4 Creating new field margins to support local wildlife • 3.5 Maintain existing ponds in Site 5 • 5.4 avoiding routing of access from local villages including Fritton with access from the B1257

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			The project Substation in Sub Site 1B accords with Project Level Design Principles including: • 2.1 through locating within the existing field pattern and adjacent to existing vegetation features to aid landscape integration, • 2.2 through retaining and enhancing vegetation as shown on the **Green Infrastructure Strategy [REP1-013]** including tree belts to the north which reinforce existing features and screen views from Great Moulton. • 2.3 and 2.4 through creation of new tree and hedgerow planting which respond to Norfolk's Green Infrastructure Strategy • 2.8 to minimise effects on amenity by offsets to nearby residential receptors • 3.2 and 3.3 strengthening existing landscape features and improving connectivity between existing features through creation of new woodland, tree belts and hedgerows responding to the local recovery network strategy and claylands initiative • 5.4 avoiding routing of access from local villages including Great Moulton with access from Station Road to the south • 6.1 efficient use of land by locating adjacent to the National Grid Substation

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			The project Substation in Sub-Site 4B accords with Project Level Design Principles including: • 2.1 through locating within the existing field pattern and adjacent to existing vegetation features to aid landscape integration, • 2.2 through retaining and enhancing vegetation as shown on the **Green Infrastructure Strategy [REP1-013]** including new tree belts to the south and east which reinforce existing features and screen views from residencies and the PRoW network. • 2.3 and 2.4 through creation of new tree planting and hedgerow planting which respond to Norfolk's Green Infrastructure Strategy • 2.8 to minimise effects on amenity by offsets to nearby residential receptors • 3.2 and 3.3 strengthening existing landscape features and improving connectivity between existing features through creation of new woodland, tree belts and hedgerows responding to the local recovery network strategy and claylands initiative • 5.4 avoiding routing of access from local villages with access from the A140 / B1257 to the north

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			The project Substation in Sub-Site 10C accords with Project Level Design Principles including: • 2.1 through locating adjacent to existing vegetation features and reinforcing these to reflect existing characteristic features and aid landscape integration, • 2.2 through retaining vegetation as shown on the **Green Infrastructure Strategy [REP1-013]** • 2.8 to minimise effects on amenity by offsets to nearby residential and recreational receptors • 3.2 and 3.3 strengthening existing landscape features and improving connectivity between existing features through creation of tree belts responding to the local recovery network strategy and claylands initiative <u>Fencing</u> Two types of fencing are proposed as part of the Scheme: • Deer fencing (wire mesh with wooden or metal posts, up to 2.5m) around the Solar PV Arrays, on a field-by-field basis. • Palisade fencing (up to 3m) around the BESS Compound, Conversion Units/33kV Sub-

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Distribution Switch Rooms, Project Substations and National Grid Substation. Lighting No permanent operational lighting is proposed within the Solar PV Sites. Motion-sensing security lighting is proposed within the 132kV Substations, 400kV Substations, National Grid Substation and BESS Compound only, to maintain safe working conditions in winter months, for security purposes and for maintenance activities. Temporary construction lighting will be used during the construction phase, with mobile lighting towers (8 kVa) deployed for safe working. Key commitments include: • Directional fittings with hoods/cowls to minimise outward light spill and glare (angled greater than 20° from horizontal) • Lighting directed towards the middle of the Order Limits rather than towards the boundaries • CCTV utilises night-vision technology to avoid the need for night-time lighting of the Solar PV Site
LIR-NCC-046	Landscape and Visual (Impacts – Substations, Grid	5.52 Norfolk County Council notes that the LVIA frequently discusses the effects of the solar arrays collectively. However, the County Council considers that greater attention should be given to the extent to	The Applicant considers **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]** and **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** provides detailed reporting and transparency in how professional judgments have

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Infrastructure and Built Elements)	which built infrastructure contributes to overall landscape change and visual impact. Such structures may remain visually prominent despite the establishment of mitigation planting and may be less capable of integration within the receiving landscape. 5.53 The County Council would therefore welcome greater clarity regarding the respective contribution of solar infrastructure and built development to the significance conclusions presented within the LVIA.	informed the overall effects reported for each phase of the Scheme. For each receptor the Scheme elements which have an influence on the receptor together with judgments on the resulting scale of change are defined with an overall position on how this effects the overall receptor.
LIR-NCC-047	Landscape and Visual (Impacts – Substations, Grid Infrastructure and Built Elements)	5.54 Particular attention should also be given to the proposed National Grid Substation and associated overhead line diversion works near Great Moulton. Unlike the solar arrays themselves, these elements introduce substantial engineered structures whose visual influence may extend beyond that of the surrounding solar infrastructure and whose effects may be more difficult to mitigate through planting alone.	The Applicant considers **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]** and **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** provides detailed reporting in relation to the resulting effects from the National Grid substation.
LIR-NCC-048	Landscape and Visual	*Alternative panel technologies* 5.55 Norfolk County Council notes that the scheme parameters allow for alternative	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 The Scheme**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Substations, Grid Infrastructure and Built Elements)	panel technologies, including fixed panel and tracker panel systems. 5.56 Given the differing height, movement characteristics, visibility profiles and operational appearance of these technologies, the County Council considers that confidence in the assessment conclusions depends upon demonstrating that the reasonable worst-case landscape and visual effects have been fully assessed. 5.57 In particular, further clarification would be beneficial regarding: • the landscape implications of panel movement • visibility of tracker systems relative to fixed systems • differences in perceived scale and visual complexity • variations in long-distance visibility and • implications for visual receptors and recreational users.	**[REP1-022**] as a worst case. Option B Fixed South facing PV arrays have not been assessed. The following provides a summary of the Applicants position on the key points raised. <u>The landscape implications of panel movement</u> Whilst the movement of Option A: Single-Axis Tracker Panels would be relatively slow, the reorientation of panels throughout daylight hours would increase the perceptibility of the Scheme, and the dynamic nature of the trackers may result in a greater visual effect than would arise from a comparable Option B Fixed South facing PV arrays. The proposed Single-Axis Tracker Panels would introduce movement into views from nearby visual receptors namely residential properties and PRoW, and for some receptors, particularly those with open and prolonged views this effect could be heightened. The movement would also affect perceptions of tranquillity and on the overall effects to landscape character. As **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, have considered Option A: Single-Axis Tracker Panels, these matters have been considered as a worst-case scenario**.** <u>Visibility of tracker systems relative to fixed systems</u>

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Option B Fixed South facing PV arrays have a reduced height and could reduce the theoretical envelope in which visual effects could occur. However, it is considered that at 3.5m high Option B would still be visible above managed hedgerows within the landscape. <u>Differences in perceived scale and visual complexity</u> As set out above Option B Fixed South facing PV arrays have a reduced height at 3.5m and could reduce the theoretical envelope in which visual effects could occur. In considering the worst-case scenario the assessment considers the Option A: Single-Axis Tracker Panels at maximum tilt and the maximum height of these at 4.5m. However, during the midday period (and hours either side) when the sun is at its highest in the sky, the Option A arrays would be horizontal (to maximise their solar gain) and at a reduced height, therefore the scale and visual complexity of the solar arrays would be reduced from that reported. This reduced height would also occur during the hours of darkness. <u>Variations in long-distance visibility</u> As set out above Option B Fixed South facing PV arrays have a reduced height and could reduce the theoretical envelope in which visual effects could occur including in longer range views. However, at 3.5m high these would still be taller than managed

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			hedgerows within the landscape, and therefore the Option B Fixed South facing PV arrays may still be visible in the wider landscape. Furthermore the inclusion of trees as part of the **Green Infrastructure Strategy [REP1-013]** would still be required to support visual screening of either option, including in longer range views. <u>Implications for visual receptors and recreational users.</u> As set out previously the proposed Single-Axis Tracker Panels would introduce movement into views from nearby visual receptors namely residential properties and from PRoW. For some receptors, particularly those with open and prolonged views, the dynamic nature of the trackers may result in a greater visual effect than would arise from a comparable Option B Fixed South facing PV arrays. Furthermore, the inclusion of trees as part of the **Green Infrastructure Strategy [REP1-013]** would still be required to support visual screening of either option.
LIR-NCC-049	Landscape and Visual (Impacts – Substations, Grid Infrastructure and Built Elements)	5.58 Norfolk County Council considers that the LVIA should clearly demonstrate that the assessed scenario reflects the maximum realistic landscape and visual envelope permitted by the application.	The Applicant notes the Authority's response would identify that the responses to LIR-NCC-048 and LIR-NCC -049 provide additional clarity on this matter.

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LIR-NCC-050	Landscape and Visual (Impacts – Substations, Grid Infrastructure and Built Elements)	5.59 The applicant's visual assessment is supported by an extensive evidence base including the Visual Baseline, representative viewpoints, visualisations, the Residential Visual Amenity Assessment (RVAA)10 and the Public Rights of Way Visual Amenity Assessment (PRoW VAA)11.	The Applicant notes the Authority's response
LIR-NCC-051	Landscape and Visual (Impacts – Visual Effects)	5.60 Norfolk County Council notes that the Boudicca Way and Via Beata are identified as high-sensitivity receptors and agrees that users of these routes have a heightened expectation of landscape enjoyment. The visual baseline also identifies a landscape characterised by agricultural land, mature hedgerows, woodland blocks, rural settlement patterns and areas of relative tranquillity. 5.61 Against this baseline, the introduction of extensive solar arrays, security infrastructure, substations and the BESS would result in substantial changes to the composition, character and experience of many views.	The Applicant notes the Authority's response
LIR-NCC-052	Landscape and Visual	5.62 Norfolk County Council acknowledges that the assessment identifies significant visual effects and that a number of these remain significant during operation.	The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Visual Effects)	However, the County Council considers that the relationship between the magnitude of visual change identified within some viewpoints and the resulting significance conclusions is not always readily apparent.	visual effects arising from visual receptors as a result of all relevant Scheme elements. For each receptor the Scheme elements which have an influence on the receptor together with judgments on the resulting scale of change are defined with an overall position on how this effects the receptor. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**.
LIR-NCC-053	Landscape and Visual (Impacts – Visual Effects)	5.63 In several locations, the visualisations demonstrate a marked transformation of views that are currently agricultural and rural in character. Where such substantial visual change is identified, Norfolk County Council considers that greater transparency would be beneficial regarding how significance conclusions have been reached and how professional judgement has been exercised.	The Applicant notes the Authority's response. ES Volume 1, Chapter 7 - Landscape and Visual and associated appendices provides a detailed overview of the landscape and visual baseline, and the Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines and it has informed the iterative design process, is robust and appropriate for the assessment of the Scheme. It is supported by a series of **visualisations [APP-136 to APP-146]** which demonstrate the visual change**.** The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from visual receptors as a result of the Scheme. Where mitigation is relied upon this is

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			clearly set out in the narrative within the description of change. For each receptor the Scheme elements which have an influence on the receptor together with judgments on the resulting scale of change are defined with an overall position on how this effects the overall receptor. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]** and the Applicant considers this suitably transparent.
LIR-NCC-054	Landscape and Visual (Impacts – Visual Effects)	5.64 The County Council is also concerned that many reductions in operational effects rely heavily upon the assumed future effectiveness of woodland, hedgerow and screening planting. While mitigation may reduce visual effects, the extent to which it is relied upon to moderate significance should be clearly articulated within the assessment.	Please see the Applicant's response to LIR-NCC-05
LIR-NCC-055	Landscape and Visual (Impacts – Recreational Receptors)	5.65 Norfolk County Council considers that the assessment of recreational effects represents one of the most important aspects of the LVIA. 5.66 Users of the Boudicca Way, Via Beata and wider PRoW network are not simply viewing the landscape from isolated	The PRoW Visual Amenity Assessment included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		locations. Rather, they experience the landscape sequentially and continuously, often over considerable distances.	contribute to the overall experience of these recreational resources.
LIR-NCC-056	Landscape and Visual (Impacts – Recreational Receptors)	5.67 The County Council therefore considers that effects on recreational receptors extend beyond representative viewpoints and include: • the cumulative experience of travelling through an altered landscape • duration of exposure • changing landscape context • cumulative visibility of multiple development parcels • changes to perceptions of tranquillity and rurality and • the overall quality of the recreational experience. 5.68 While the PRoW VAA provides useful evidence, Norfolk County Council is not fully persuaded that the experiential effects of travelling through a changing landscape are consistently reflected in the significance conclusions reported within the LVIA.	The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising on the PRoW network as a result of the Scheme. Furthermore, the PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. In response to the ExA Q1.11.4 the Applicant has prepared and submitted at Deadline 2 a sequential route assessment of commonly used circular and combined routes which connect to the local settlements to aid understanding of effects on these.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
LIR-NCC-057	Landscape and Visual (Impacts – Recreational Receptors)	5.69 There is a particular concern regarding the distinction between reducing visibility and maintaining landscape experience. Mitigation planting may screen infrastructure, but it may also alter openness, restrict long-distance views and fundamentally change the character of route corridors. The County Council therefore remains concerned that route-wide and sequential effects may not be fully reflected within the significance conclusions reported. 5.70 Consequently, the County Council considers that mitigation should not automatically be assumed to represent an unqualified benefit. Its effects on recreational experience should be considered alongside its screening function.	The Applicant considers the landscape in which the Scheme is located has varying degrees of visual openness. Landscape and visual matters have been a key consideration throughout the design evolution and the **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Measures proposed 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 provide visual screening. Where proposed mitigation could result in an adverse effect these have been acknowledged in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices. **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** identified Minor Adverse effects (not significant in EIA terms) on the tourism industry for all Phases of the Scheme. This reflects the potential for visual amenity impacts.
LIR-NCC-058	Landscape and Visual	5.71 Norfolk County Council notes that the applicant has also undertaken a Residential Visual Amenity Assessment (RVAA)12 in accordance with recognised Landscape Institute guidance.	The Applicant notes the Authority's response

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Residential Visual Amenity)		
LIR-NCC-059	Landscape and Visual (Impacts – Residential Visual Amenity)	5.72 The County Council accepts that significant visual effects do not necessarily equate to unacceptable impacts on residential amenity and that the Residential Visual Amenity Threshold represents a relatively high bar. 5.73 However, where residents experience extensive changes in outlook arising from solar arrays, substations, fencing, the BESS or associated infrastructure, transparency regarding the assessment process becomes particularly important. 5.74 Norfolk County Council therefore considers that particular scrutiny should be given to locations where: • Significant visual effects are identified • substantial change in outlook occurs	The Applicant notes the Authority's response.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• effects persist over the long term and • conclusions regarding acceptability rely heavily upon future mitigation establishment.	
LIR-NCC-060	Landscape and Visual (Impacts – Overall Commentary on Visual Effects)	5.75 Overall, Norfolk County Council considers that the visual assessment has been undertaken using recognised methodology and is supported by a comprehensive suite of technical evidence and visual material. 5.76 However, consistent with the principles contained within Landscape Institute TGN 20/01: Reviewing Landscape and Visual Impact Assessments and Landscape Appraisals, the County Council considers that greater transparency is required regarding the exercise of professional judgement in several parts of the assessment.	The Applicant notes the Authority's response
LIR-NCC-061	Landscape and Visual (Impacts – Overall Commentary on Visual Effects)	5.77 In particular, further explanation would assist in understanding: • how substantial visual change has informed significance conclusions	The Applicant notes the Authority's response and provides the following response to the points raised <u>How substantial visual change has informed significance conclusions</u> The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• how assumptions regarding mitigation growth have influenced outcomes • how representative viewpoints reflect route-wide experience • how sequential recreational effects have been considered • how built infrastructure has contributed to visual effects and • how alternative panel technologies have been incorporated into the assessment. 5.78 Given the scale of the proposed development and the importance of rural, recreational and residential receptors throughout the study area, Norfolk County Council considers that these matters warrant careful scrutiny during examination.	appendices **namely ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from the Scheme. For each receptor the Scheme elements which have an influence on the receptor are considered and the magnitude of a visual effect is assessed with reference to scale of change along with geographical extant, its duration and reversibility. The size or scale of change in the view relates to the degree of contrast to, or integration with, the visual composition, which is likely to result from the Scheme; and is influenced by the relative time over which a view is experienced and whether it is a full, partial, or glimpsed view. The judgement of size or scale of visual change in the view considers: - The scale of the change in the view with respect to the loss or addition of features in the view and changes in the view composition and depth of the view, including the proportion of the view occupied by the Scheme. - The degree of contrast or integration of any new elements or changes in the landscape with the existing or remaining landscape features and characteristics in terms of form, scale and mass, line, height, colour and texture seen in the view.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			- The nature of the view of the Scheme, including the relative amount of time over which it will be experienced and whether views will be full, partial, glimpsed, or screened. Whether a visual change is substantial is a matter of professional judgement, but where the size and scale of the visual change are at the higher end of the scale (i.e. large or very large), there is the increased likelihood that effects will be considered significant. In accordance with the methodology the assessment combines judgments of receptor sensitivity and magnitude of visual effect to determine the overall level of significance. With reference to **Table 7.1.17** of **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118],** where effects are concluded as moderate or larger this is recorded as a significant effect. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]** and the Applicant considers this suitably transparent. <u>How assumptions regarding mitigation growth have influenced outcomes</u> For the operational period the assessment considers a year 1 and a year 15 scenario. At year 1 proposed as shown on the **Green Infrastructure Strategy [REP1-013]** are considered not be established and therefore

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			they will provide no screening benefit. Fifteen years following opening, these measures are considered to have established and are likely to be providing the function for which they were included such as screening and / or integration. This establishment considers a uniform rate of growth for trees, and woodland planting of 0.4m every 1 year. At Year 15 this will result in new trees, linear tree belts, and woodland planting having reached a minimum height of 7.5m. This would provide screening of the solar infrastructure but not the tallest elements of the Scheme such as the bus bars within the substations and OHL pylons. For hedgerow a uniform growth of 0.4m every 1 year is considered. In accordance with the commitments set out within the Outline LEMP this would result in hedgerows being able to be maintained at a height of 3m by Year 15. <u>How representative viewpoints reflect route-wide experience</u> The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices namely **ES Volume 3, Appendix 7.4 – Visual Baseline**, and **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** defines the visual baseline and visual receptors, and visual effects arising as a result of the Scheme. The assessment of effects is structured around agreed representative

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			viewpoints which are representative of the visual receptors within the defined study area, which includes the PRoW network, and highway network. Visual receptors travelling on routes may experience views of the Scheme at multiple locations and to aid this understanding the agreed representative viewpoints are organised by Site and identify the relevant visual receptors at each location. In addition to aid understanding of route wide experiences on receptors with increased sensitivity (namely the PRoW network), the PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall route wide experience of these recreational resources. <u>How sequential recreational effects have been considered</u> In addition to the previous response, regarding the PRoW Visual Amenity Assessment, in response to the ExA Q1.11.4 the Applicant is preparing a sequential route assessment of commonly used circular and combined routes which connect to the local settlements and are used by the local population to aid understanding of effects on these.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			<u>How built infrastructure has contributed to visual effects</u> The visual assessment within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices **namely ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from the Scheme including the introduction of built infrastructure. For each receptor the Scheme elements which have an influence on the receptor are considered and the magnitude of a visual effect is assessed with reference to scale of change along with geographical extant, its duration and reversibility. The size or scale of change in the view relates to the degree of contrast to, or integration with, the visual composition, which is likely to result from the Scheme; and is influenced by the relative time over which a view is experienced and whether it is a full, partial, or glimpsed view. The judgement of size or scale of visual change in the view considers: - The scale of the change in the view with respect to the loss or addition of features (including built infrastructure) in the view and changes in the view composition (including as a result of built infrastructure) and the proportion of the view occupied by the Scheme.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			- The degree of contrast or integration of any new built infrastructure and elements or changes in the landscape with the existing or remaining landscape features and characteristics in terms of form, scale and mass, line, height, colour and texture seen in the view. - The nature of the view of the Scheme, including the relative amount of time over which it will be experienced and whether views will be full, partial, glimpsed, or screened. The approach and judgment align with that set out within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]** and the Applicant considers this suitably transparent. <u>How alternative panel technologies have been incorporated into the assessment.</u> **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 The Scheme [REP1-022**] as a worst case only. Option B Fixed South facing PV arrays have a reduced height and could reduce the theoretical envelope in which visual effects could occur, albeit this reduced height is still taller than the typical height of field bounding

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			hedgerow and would therefore still remain visible above these features.
LIR-NCC-062	Landscape and Visual (Impacts – Cumulative Effects)	5.79 Norfolk County Council notes that cumulative assessment has been undertaken in accordance with recognised guidance. However, the County Council considers that cumulative effects should be considered as more than a question of visibility.	The cumulative assessment included within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** considers a number of committed developments which have the potential to result in cumulative effects on Landscape and Visual receptors within the associated Study Area. The list has been formed by considering those committed developments which are located within the same identified published landscape character areas (considered within the LVIA), and / or that interact with visual receptors in relation to the Scheme within the Study Area, which include residents, recreational users of PRoW / long-distance routes, and road users. A number of short-listed committed developments which lie beyond the Study Area have been discounted, as these developments are not shown to have intervisibility with the Scheme based on the ZTVs and / or are located in a different district landscape character areas, and therefore unlikely to result in significant cumulative landscape and visual effects. The approach therefore does not only consider visibility as suggested.
LIR-NCC-063	Landscape and Visual	5.80 The wider Norfolk landscape is increasingly influenced by major energy infrastructure proposals, including solar energy developments, electricity	The cumulative assessment included within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** follows recognised guidance. Where relevant the assessment considers effects on the landscape

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Cumulative Effects)	transmission infrastructure and associated substations. In this context, cumulative assessment should consider how multiple developments interact to influence: • landscape character • settlement setting • tranquillity • visual amenity • recreational experience and • perceptions of rurality. 5.81 Particular consideration should be given to interactions with other large scale energy infrastructure proposals, including the Norwich to Tilbury project, where relevant.	resource (including settlements), and tranquillity, and the urbanising influence of development and visual amenity (including recreational experience on affected PRoW's). The Norwich to Tilbury project at its closest to the Scheme is located 3.9km to the northwest of Sub- Site 7A, and therefore beyond the defined LVIA study area, and not considered further within the LVIA. As set out in response to Action Point 45 in **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action** Points [REP1-098] the Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on an Interrelationships document, which considers large scale energy infrastructure proposals in Norfolk (and beyond its borders if relevant), including the Norwich to Tilbury project. A meeting was held jointly between the Applicant and both local authorities on 28 September 2026, the Interrelationships report being an agenda item. Ongoing dialogue will take between the parties with further meetings scheduled shortly after Deadline 1. The Applicant proposes to submit the Interrelationships report into the Examination once the approach is agreed.
LIR-NCC-064	Landscape and Visual	5.82 Norfolk County Council considers that the most significant cumulative effects may arise from the collective and progressive	Please see responses to LIR-NCC-062, and 063. In addition, a proportionate approach has been undertaken and the Applicant has sought to assess all

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Impacts – Cumulative Effects)	change introduced across rural landscapes, even where individual developments are considered acceptable in isolation. 5.83 The County Council would therefore welcome greater explanation regarding how cumulative effects on landscape character, settlement setting, recreational experience and perceptions of tranquillity have informed the overall conclusions of the cumulative assessment.	cumulate schemes in accordance with *The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017* (the EIA Regulations) and the Planning Inspectorate's *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment.*
LIR-NCC-065	Landscape and Visual (Requirements, Obligations and other Measures – Landscape and Ecology Management Plan)	5.84 The applicant proposes to secure landscape mitigation, habitat creation and ecological enhancement through the Outline Landscape and Ecology Management Plan (OLEMP)13. The OLEMP establishes a framework for implementation, management and monitoring during both the construction and operational phases of the scheme and commits to the preparation of a detailed Landscape and Ecology Management Plan (LEMP), secured through a requirement of the draft DCO. The OLEMP also confirms a commitment to deliver at least 10% biodiversity net gain (BNG) for habitats, hedgerows and watercourses.	The Applicant notes this comment.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
LIR-NCC-066	Landscape and Visual (Requirements, Obligations and other Measures – Landscape and Ecology Management Plan)	5.85 Norfolk County Council welcomes the preparation of the OLEMP and acknowledges that it provides the principal mechanism through which landscape mitigation and environmental enhancement would be secured. However, the County Council notes that the OLEMP remains an outline document and expressly states that it is based on a preliminary design, with details subject to future development and stakeholder engagement. Consequently, a number of the landscape and visual outcomes relied upon within the LVIA are dependent upon management measures that are not yet fully specified.	The Applicant notes the Authority's comments regarding the outline nature of the Outline LEMP [**REP1-064**]. However, the Outline LEMP has been prepared in accordance with established practice and reflects the level of detail that is proportionate and appropriate at the current stage of the project. The document provides a clear framework for the delivery, management and maintenance of landscape mitigation and environmental enhancement, whilst recognising that detailed design development will continue as the project progresses. The landscape and visual assessment has been undertaken on the basis of a realistic and robust assessment of the proposed mitigation, consistent with the principles set out within the *Guidelines for Landscape and Visual Impact Assessment (GLVIA3)* and relevant design and assessment best practice. The assessment does not rely upon speculative measures but instead considers mitigation that is integral to the project and capable of being secured through the DCO. Importantly, the DCO process provides a robust mechanism for securing the implementation of landscape mitigation. A LEMP is secured through the requirements of the DCO and will establish the objectives and management principles that must be adhered to during subsequent detailed design stages. Pursuant to Requirement 7, the final LEMP must be substantially in accordance with the outline version and must be approved by South Norfolk Council in

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			consultation with Natural England (in its capacity as the relevant statutory nature conservation body). The detailed landscape proposals will be developed within approved parameters established within the Application, namely the Outline LEMP [**REP1-064**]. and will be subject to further consultation with relevant stakeholders and approval by the relevant planning authority where required. It is therefore considered that the outline nature of the document does not undermine the conclusions of **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043**] . Rather, it reflects the staged approach to infrastructure design, whereby strategic mitigation commitments are identified and assessed at the application stage and subsequently refined through detailed design, whilst remaining secured through the statutory framework provided by the DCO. This approach is consistent with the established practice adopted on nationally significant infrastructure projects and provides confidence that the landscape and visual mitigation considered within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** can be delivered and maintained over the long term.
LIR-NCC-067	Landscape and Visual (Requirements, Obligations and	5.86 A recurring theme throughout the LVIA is the reduction of effects between Year 1 and Year 15 through the establishment of woodland, hedgerow and screening planting. The assessment	The Applicant notes the Authority's response and draws attention to the response at LIR-NCC-066.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	other Measures – Reliance on Mitigation Planting)	repeatedly relies upon the assumption that mitigation planting will mature successfully and become effective in reducing landscape and visual effects over time. 5.87 Norfolk County Council has no objection in principle to this approach; however, the degree to which future mitigation underpins the assessment conclusions introduces an inherent uncertainty. The confidence which can be placed in the predicted Year 15 effects is directly related to the successful delivery, growth, management and maintenance of mitigation measures over a prolonged period.	
LIR-NCC-068	Landscape and Visual (Requirements, Obligations and other Measures – Reliance on Mitigation Planting)	5.88 This is particularly relevant where mitigation is relied upon to reduce effects upon: • high sensitivity landscape character areas • areas of perceived tranquillity • the Boudicca Way and Via Beata • the wider public rights of way network • residential visual receptors	The Applicant notes the Authority's response and draws attention to the response at LIR-NCC-066.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• settlement settings and • receptors where significant residual effects remain identified 5.89 Norfolk County Council therefore considers that the effectiveness, deliverability and long-term stewardship of mitigation planting becomes a matter of central importance rather than a secondary implementation issue.	
LIR-NCC-069	Landscape and Visual (Requirements, Obligations and other Measures – Monitoring, Establishment and Adaptive Management)	5.90 The OLEMP confirms that detailed monitoring arrangements will be prepared through the final LEMP and that monitoring provisions will be reviewed periodically. While this commitment is welcomed, Norfolk County Council considers that monitoring should extend beyond the simple establishment of vegetation and should instead test whether the landscape and visual outcomes assumed within the LVIA are actually being achieved.	The Applicant notes the Authority's response and draws attention to the commitments within the **Outline LEMP [REP1-064]** in Section 4.1 Monitoring which sets out: *"The applicant will appoint a suitably qualified person to oversee the monitoring activities during the operational phase of the Scheme, which will be undertaken to determine:* *- Whether measures have been implemented as agreed.* *- The relative success / effectiveness of the measures reporting progress towards vegetation establishment and towards habitat condition targets.* *- Whether maintenance operations have been undertaken and if remedial actions are required providing details on how to remedy the situation if any of the measures fail."*

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			These measures are drafted with long term environmental outcomes in mind, and therefore that the assumed outcomes of the LVIA are achieved.
LIR-NCC-070	Landscape and Visual (Requirements, Obligations and other Measures – Monitoring, Establishment and Adaptive Management)	5.91 In Norfolk County Council's view, the detailed LEMP should include: • measurable success criteria • minimum survival rates for woodland, tree and hedgerow planting • implementation milestones and trigger points • replacement planting requirements • fixed-point photographic monitoring • periodic review of visual screening effectiveness • reporting requirements • adaptive management provisions and • mandatory remedial measures where planting fails to achieve its intended objectives. 5.92 The County Council considers these measures to be particularly important because a substantial proportion of the	The Applicant will continue to discuss these points further with the Council and provide an update to the **Outline LEMP [REP1-064]** as appropriate.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		reduction in effects identified within the LVIA is dependent upon successful mitigation establishment rather than changes to the scheme itself.	
LIR-NCC-071	Landscape and Visual (Requirements, Obligations and other Measures – Recreational Routes and Public Rights of Way)	5.93 The applicant has prepared an Outline Public Rights of Way and Permissive Paths Management Plan, which provides a framework for managing access and maintaining recreational routes throughout the lifetime of the scheme. 5.94 Norfolk County Council welcomes the preparation of the document. However, as identified elsewhere in this chapter, the County Council remains concerned that the experiential effects of the scheme upon recreational receptors may not be fully reflected within the LVIA.	The PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources.
LIR-NCC-072	Landscape and Visual (Requirements, Obligations and other Measures – Recreational Routes and Public Rights of Way)	5.95 The applicant's response to Norfolk County Council's previous consultation comments relies heavily upon the Green Infrastructure Strategy and landscape mitigation proposals contained within the OLEMP. However, it is not yet clear whether the proposed measures will adequately address:	The Applicant acknowledges the concerns raised regarding PRoW and matters regarding route wide recreational effects, sequential effects, experiential effects including tranquillity and rurality and value of the resource have been responded to previously. The Applicant would welcome the opportunity for further engagement with NCC PRoW officers.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• route-wide recreational effects • sequential visual effects • changes in landscape experience • cumulative visibility of multiple development parcels • changes in perceptions of tranquillity and rurality and • effects on the recreational value of the landscape. 5.96 Norfolk County Council therefore considers that opportunities should be explored through the detailed LEMP and PRoW Management Plan to secure route-specific enhancements, particularly along the Boudicca Way, Via Beata and other recreational corridors experiencing significant residual effects.	**The Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme and further opportunities can be explored as part of the future iterations of this document.
LIR-NCC-073	Landscape and Visual (Requirements, Obligations and Other Measures – Landscape Mitigation and	5.97The OLEMP proposes substantial areas of broadleaf woodland, hedgerows, hedgerows with trees, scrub, grassland and tree belt planting. These measures clearly have the potential to reduce visibility and strengthen landscape structure.	Landscape and visual matters have been a key consideration throughout the design evolution, and the **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Decision making with regard to new landscape features has been informed by an understanding of the local environmental, and measures proposed include strengthening and

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Character Change)	5.98 However, Norfolk County Council considers that the relationship between mitigation and landscape character warrants closer examination.	reinforcing existing hedgerows, alongside the provision of new tree and woodland planting. These measures will assist in integrating the Scheme within the landscape and provide visual screening. The Applicant considers the landscape in which the Scheme is located has varying degrees of visual containment, which is a result of its component features and woodlands are characteristic features. Furthermore, the Green Infrastructure Strategy has sought to positively respond to local objectives of Norfolk's Green Infrastructure Strategy, the Local Nature Recovery Strategy and Norfolk Clayland Initiative, creating green infrastructure assets including woodland and tree planting which connect fragmented habitats and features whilst aiding visual screening. Nevertheless, where proposed mitigation could result in an adverse effect these have been acknowledged in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices.
LIR-NCC-074	Landscape and Visual (Requirements, Obligations and Other Measures – Landscape Mitigation and	5.99 The LVIA generally treats woodland and screening planting as mitigation. While this can be appropriate, many of the baseline qualities identified within the assessment include openness, visual connectivity, expansive views and perceived tranquillity. In some locations, extensive woodland belts or screening vegetation may themselves introduce	The Applicant notes the Authority's response. Please see the Applicants response to LIR-NCC-057.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Character Change)	noticeable changes to landscape character. 5.100 Consequently, Norfolk County Council considers that mitigation planting should not automatically be assumed to constitute an unqualified benefit. The assessment should acknowledge that planting may both mitigate effects and create new landscape character effects of its own, particularly along recreational routes and within open agricultural landscapes.	
LIR-NCC-075	Landscape and Visual (Requirements, Obligations and Other Measures – Long-Term Management and Decommissioning)	5.101 The OLEMP states that long-term management requirements will be secured through the detailed LEMP. However, it also notes that following decommissioning, future land use and management would ultimately be determined by landowners and that some mitigation and habitat features may remain in situ. 5.102 Norfolk County Council considers that this introduces a degree of uncertainty regarding the long-term landscape outcome assumed within the LVIA.	As identified in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, the Sites would be decommissioned and the land returned to the landowner (the National Grid Substation and the Grid Connection Infrastructure would remain in situ). The LVIA assessment scenarios are detailed within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043].** The 'Decommissioning 2091' scenario assesses the landscape and visual effects arising during the decommissioning phase, including activities such as plant operations and vehicle movements across the 24-month decommissioning period. The Decommissioning 2091 scenario assumes that the continued screening benefits provided by the established landscape mitigation planting (woodland,

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			trees, and hedgerows) will remain in place during the decommissioning period. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** does not assess a post-decommissioning scenario following completion of the decommissioning works and the land returned to the landowners. Post-decommissioning, the landowners would choose how the land is to be used and managed subject to any legislative requirements or the need to obtain any additional consents, permits or licences that may apply at the time. As the National Grid Substation and the Grid Connection Infrastructure would remain in situ, planting specifically required to mitigate the impacts of the National Grid Substation would be retained. See Chapter 5 of the **Outline LEMP [REP1-064].** Any concerns raised by NCC regarding the management of land once returned to landowners post-decommissioning therefore does not alter the landscape and visual effects reported within the ES.
LIR-NCC-076	Landscape and Visual (Requirements, Obligations and Other Measures – Long-Term	5.103 Given that decommissioning effects and recovery assumptions form part of the overall assessment, it would be beneficial for the applicant to clarify the extent to which the post-decommissioning landscape described in the Environmental	See the Applicants response to LIR-NCC-075 above.

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	Management and Decommissioning)	Statement represents a secured outcome as opposed to a potential future scenario.	
LIR-NCC-077	Landscape and Visual (Requirements, Obligations and Other Measures – Green Infrastructure, Nature Recovery and Environmental Gain)	5.104 Norfolk County Council welcomes the applicant's commitment to deliver BNG and notes that national policy encourages developments to secure wider environmental gains in addition to biodiversity improvements.	Whilst there is currently no legislative requirement for the Scheme to provide quantifiable BNG, the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. A detailed approach is provided within the **Biodiversity Net Gain Report [APP-218]** which discusses the Scheme's adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. On the basis of the above it is considered that the biodiversity gain hierarchy has been correctly applied in relation to the Scheme and the BNG assessment. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**.
LIR-NCC-078	Landscape and Visual (Requirements, Obligations and Other Measures –	5.105 The County Council has also had regard to the Norfolk Local Nature Recovery Strategy and the Greater Norwich Green Infrastructure Strategy SPD. These documents provide an important local evidence base regarding	Whilst the Schemes design evolution was progressed prior to the publication of the LNRS on 31st October 2025, the embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** have been applied to enhance ecological connectivity.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Green Infrastructure, Nature Recovery and Environmental Gain)	habitat connectivity, green infrastructure networks, landscape resilience, recreational access and opportunities for landscape-scale environmental enhancement.	Where possible, areas of land located within the Order Limits identified as having potential to become of particular importance to biodiversity and contribute to enhanced landscape scale ecological connectivity if suitable nature recovery actions are carried out, known as 'areas that could become of particular importance' (ACB) within the LNRS Local Habitat Map have been targeted with their suggested habitat type when developing the **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**, thereby providing enhanced opportunities for biodiversity within and around the Order Limits.
LIR-NCC-079	Landscape and Visual (Requirements, Obligations and Other Measures – Green Infrastructure, Nature Recovery and Environmental Gain)	5.106 Norfolk County Council considers that the detailed LEMP should clearly demonstrate how the proposed mitigation and enhancement measures contribute towards these wider strategic objectives. 5.107 In particular, greater clarity would be welcomed regarding: • habitat connectivity beyond the order limits • contributions to wider ecological networks • multifunctional green infrastructure delivery	The Applicant will continue to discuss these points further with the Council and provide an update to the **Outline LEMP [REP1-064]** as appropriate.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• enhancement of recreational connectivity • strengthening of landscape resilience • woodland and hedgerow network enhancement and opportunities for landscape-scale nature recovery.	
LIR-NCC-080	Landscape and Visual (Requirements, Obligations and Other Measures – Green Infrastructure, Nature Recovery and Environmental Gain)	5.109 Given the scale of the scheme and the significant residual landscape and visual effects identified within the LVIA, Norfolk County Council considers that the mitigation strategy should strive not merely to offset harm but to deliver a demonstrable improvement in environmental quality, landscape structure and green infrastructure connectivity.	The Applicant considers it has demonstrated the application of good design and that the Schemes Green Infrastructure Strategy does deliver improvements. The embedded design principles adopted and detailed within **Design Approach Document [APP-212]** have been applied to retain, protect and enhance ecological assets. With an environmental led approach which is based on an understanding of place and baseline conditions, proposed measures align to LNRS strategies including new deciduous woodland creation, scrub creation, neutral grassland creation and provision of a mosaic of habitats. The LNRS aims to connect, expand and enhance areas of arable field margins, enhance and restore hedgerows and hedgerow trees, promote effective management techniques and controlled grazing regimes, incorporate mosaic features within habitats, and restore farmland ponds and improve riparian

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			habitats alongside woodland and scrub creation for defined areas within the Order Limits. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the Green Infrastructure Strategy. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]**. The Greater Norwich Green Infrastructure Strategy, aims to address deficiencies in accessible greenspace, strengthen the network of greenways, increase green cover in the built environment, strengthen habitat connectivity and support urban nature recovery, and embed GI into new development. The **Green Infrastructure Strategy [REP1-013]** supports the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure assets through new woodland belts and native tree planting to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity, and support climate change resilience.

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LIR-NCC-081	Landscape and Visual (Requirements, Obligations and Other Measures – Green Infrastructure, Nature Recovery and Environmental Gain)	*Additional Requirements and Amendments* 5.110 In light of the concerns identified throughout this section, Norfolk County Council considers that additional certainty should be secured through the detailed LEMP and associated DCO requirements. 5.111 In particular, the detailed documents should demonstrate: • how mitigation responds to identified landscape sensitivities • how proposals support settlement setting and local distinctiveness • how mitigation contributes to the objectives of the Norfolk Local Nature Recovery Strategy • how proposals align with the Greater Norwich Green Infrastructure Strategy • how habitat connectivity beyond the Order Limits has been considered • how visual screening effectiveness will be monitored • how failed mitigation will be replaced or remediated	The Applicant will continue to discuss these points further with the Council and provide an update to the **Outline LEMP [REP1-064]** as appropriate.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		• how recreational routes will be enhanced where significant effects remain • how landscape enhancement objectives will be monitored and reviewed and • how long-term management commitments will be secured throughout the operational life of the scheme.	
LIR-NCC-082	Landscape and Visual (Requirements, Obligations and Other Measures – Green Infrastructure, Nature Recovery and Environmental Gain)	5.112 The County Council also considers that fixed-point monitoring locations should be linked to the principal visual and recreational receptors identified within the LVIA in order to provide evidence of whether the predicted landscape and visual outcomes are being achieved in practice.	The Applicant will continue to discuss this point with the Authority and provide an update to the **Outline LEMP [REP1-064]** as appropriate.
LIR-NCC-083	Landscape and Visual (Conclusion)	5.114 Norfolk County Council acknowledges the mitigation and enhancement measures proposed through the OLEMP and associated management	The Applicant notes the Authority's response. Please refer to the Applicants response in LIR-NCC-066.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		plans and welcomes the intention to secure these through the DCO. 5.115 However, the County Council's review of the LVIA indicates that a significant proportion of the reduction in landscape and visual effects between Year 1 and Year 15 is dependent upon mitigation planting that has yet to be fully designed, implemented or tested. 5.116 For this reason, Norfolk County Council considers that the effectiveness, monitoring and long-term management of mitigation should be afforded considerable weight during examination. Robust requirements, adaptive management provisions, replacement planting obligations and long-term stewardship commitments will be necessary to provide confidence that the landscape and visual outcomes assumed within the Environmental Statement are both achievable and maintainable throughout the lifetime of the scheme. 5.117 In Norfolk County Council's view, mitigation should not simply be secured; it should be demonstrably capable of delivering the landscape, visual, recreational and environmental outcomes	

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		upon which the applicant's assessment depends.	
LIR-NCC-084	Ecology and Biodiversity (Summary)	6.1 National policy in EN-1 requires application of the mitigation hierarchy, protection of designated sites, protected species, priority and irreplaceable habitats, and delivery of wider environmental gains, including biodiversity net gain. EN 5 is also relevant to the linking infrastructure, highlighting opportunities for electricity networks to reconnect fragmented habitats, create green corridors and reinstate appropriate hedgerows.	Please refer to the responses provided in comment ID LIR-NCC-090 in relation to the mitigation hierarchy, LIR-NCC-091 in relation to environmental and biodiversity net gains, and LIR-NCC-095 in relation to NPS EN-5.
LIR-NCC-085	Ecology and Biodiversity (Summary)	6.2 Within this policy context, the Environmental Statement identifies a highly sensitive ecological baseline across and around the Order Limits, including internationally and nationally designated sites, County Wildlife Sites, Roadside Nature Reserves, ancient woodland, lowland fen, priority habitats, hedgerows, ponds, rivers and nationally important barbastelle bat populations. The ES concludes that no significant adverse residual ecological effects are anticipated, with effects generally assessed as negligible or beneficial following embedded mitigation, habitat creation, long-term	The likely effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensate for, through the design process. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]**, the

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		management and biodiversity enhancement. 6.3 However, the County Council considers that this conclusion is dependent on the robustness, timing and enforceability of the proposed mitigation and management measures. Particular scrutiny should be applied to the direct crossing of Fritton Grange Meadows CWS and Lower Spring Wood CWS, potential impacts on Roadside Nature Reserves, reliance on 30m buffers to ancient woodland and lowland fen, and the assumptions that temporary habitat disturbance and severance can be fully addressed through future reinstatement and enhancement.	**Outline DEMP [REP1-062]**, **Outline LEMP [REP1-064]** (which is a secured document) and the **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]**.
LIR-NCC-086	Ecology and Biodiversity (Summary)	6.4 Hedgerows form a principal ecological network across the site and are important for bats, dormice, birds and wider landscape-scale connectivity. Although the Council acknowledges the proposed retention of woodland and trees, it notes the potential loss or severance of hedgerows, including hedgerows identified as Important under the Hedgerows Regulations 1997, particularly associated with the linking infrastructure. The Council	The Applicant makes note of this comment and hedgerow removal has already been assessed in the **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]**. Figure 1 of the **Outline LEMP [REP1-064]** identifies all proposed hedgerow losses. This plan also defines the reason for the loss, including cable route installation, permanent access (for future maintenance), and haulage routes. Where possible

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		would therefore expect up-to-date hedgerow assessment, clearer justification of removals, certainty on reinstatement timescales, and robust commitments to replacement, enhancement and long-term management.	loss has been minimised by consolidation of activities in one location.
LIR-NCC-087	Ecology and Biodiversity (Summary)	6.5 Barbastelle bats are a key issue given the ES identifies a bat resource of national importance, records barbastelle activity at every survey location, and confirms that the Order Limits fall within multiple 6km Core Sustenance Zones associated with known maternity colonies. The County Council considers that the evidence base should fully address commuting routes, roosting potential, woodland-edge use, habitat connectivity and the potential for direct and indirect impacts from habitat removal or severance. Following any additional survey work, the Council would expect the adequacy of mitigation, including ancient woodland buffers and habitat connectivity measures, to be reviewed.	The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zones, and consideration of potential impacts to roosting, commuting and foraging bats within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The Scheme design primarily utilises intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including barbastelle bat maternity roosts). Therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced

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			disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and illustrated in **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025]**, include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including barbastelle bats.
LIR-NCC-088	Ecology and Biodiversity (Summary)	6.6 The County Council also notes the need for clarity in relation to species and habitats associated with ponds and watercourses, including great crested newts, lowland fen, Hempnall Beck and white-clawed crayfish. In particular, plausible evidence of a remnant white-clawed crayfish population in the River Pye has not been adequately addressed, despite the habitat being described as sub-optimal. The Council would expect species-specific investigation and impact assessment, informed by engagement with Norfolk Rivers Trust, the Zoological Society of East Anglia and other relevant local record holders, with any necessary	The Applicant notes the County Council's comments regarding species and habitats associated with ponds and watercourses. Great crested newts, lowland fen, Hempnall Beck and white-clawed crayfish have each been considered within the ecological baseline and impact assessment presented in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and its supporting technical appendices. Where potential impact pathways were identified, appropriate avoidance and mitigation measures have been incorporated into the Scheme design and secured through the relevant environmental management documents. In relation to white-clawed crayfish specifically, the Applicant provided further justification in the **Applicant's Position Statement on White-Clawed**

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		avoidance, mitigation, licensing and monitoring measures secured. More generally, where species have been scoped out or impacts assessed as unlikely, the applicant should demonstrate sufficient certainty in the baseline and explain how alternative construction methods or changed working assumptions would be managed if required.	**Crayfish [PDA-007]**. Following engagement with Norfolk Rivers Trust and Zoological Society of East Anglia, the Applicant has received further evidence of an extant population and potentially suitable habitat within the wider River Tas catchment, but no records within the Order Limits. This information will be incorporated into the next update of the relevant ecological documents at Deadline 3 but does not alter the identified impact pathways or assessment conclusions. Hempnall Beck and the tributary of the River Tas are subject to embedded avoidance and mitigation, including trenchless crossing techniques, stand-offs, pollution prevention, sediment control and biosecurity measures. These controls would avoid or minimise potential effects should white-clawed crayfish occur within a watercourse affected by the Scheme. No additional survey, licensing or monitoring requirements are therefore considered necessary.
LIR-NCC-089	Ecology and Biodiversity (Summary)	6.7 The County Council considers that there is insufficient information available to provide a definitive response on arboricultural impacts. The principal concern is that highway visibility splays, abnormal indivisible loads and other highway works may require tree and hedge works that have not been adequately assessed or quantified.	The Applicant has assessed the impacts of highway visibility splays at the indicative access points in Table 1.6 and the corresponding tree impacts are shown as 'Possible tree impacts' in Annex D Tree Impact Plan within the **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]**. The arboricultural impacts for abnormal indivisible loads and other highway works are subject

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			to detailed design and cannot be accurately assessed at this stage.
LIR-NCC-090	Ecology and Biodiversity (Policy Context – Overarching national policy statement for energy (EN-1))	6.9 Although the national need case is strong, EN-1 is clear that ecology impacts must first be addressed through the mitigation hierarchy. Paragraphs 4.2.23-4.2.25 require applicants to: • apply the mitigation hierarchy • demonstrate avoidance where possible • reduce and mitigate impacts • provide compensation for residual effects • monitor mitigation effectiveness.	As set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044],** 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 of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**. The mitigation hierarchy has been applied to avoid, reduce or mitigate through the design process. Mitigation and monitoring is secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062]**, **Outline LEMP [REP1-064]** and **Outline Protected Species Mitigation Strategy [REP1-050]**. In relation to habitat loss and wildlife displacement, the majority of the Order Limits comprise intensively managed arable land, with higher value habitats concentrated in linear features such as hedgerows, which have been retained, where feasible.

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			Minimum offset distances from key ecological features are secured through the **Design Principles, Parameters and Commitments [REP1-078]**, and habitat corridors across the farmed landscape are reinforced. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors.
LIR-NCC-091	Ecology and Biodiversity (Policy Context – Overarching national policy statement for energy (EN-1))	6.10 Paragraph 4.6.1 states that projects should not only avoid, mitigate and compensate harms but also seek opportunities for enhancement; and Paragraph 4.6.2 states biodiversity net gain is an essential component of environmental net gain. Paragraphs 4.6.6-4.6.12 are particularly important because they require NSIP proposals to: • seek opportunities to contribute to and enhance the natural environment • present biodiversity metric calculations	The Scheme has committed to deliver BNG, including: • 30% gain for habitats; • 25% gain for hedgerows; and • 10% gain for watercourses. These BNG units are secured via Requirement 9 in the **Draft DCO [REP1-014]**. The biodiversity gain hierarchy has been applied to the Scheme and the BNG assessment, as set out in the **Biodiversity Net Gain Report [APP-218]**. The **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]** demonstrate that the Scheme has the capacity to

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		• discuss outcomes with Natural England during pre-application • consider habitat connectivity • align with Local Nature Recovery Strategies where relevant. 6.11 For East Pye, this provides policy support for seeking: • species-rich grassland enhancement • hedgerow enhancement • habitat creation • woodland buffers • landscape-scale ecological connectivity • long-term management commitments.	deliver more than 10% gains for habitats, hedgerows and watercourses whilst complying with the DEFRA Metrics' Trading Rules. New habitats to be provided include species-rich grasslands, woodland buffers, ponds, as well as creation of new hedgerows and enhancement of existing hedgerows. Whilst the Schemes design evolution was progressed prior to the publication of the LNRS on 31st October 2025, the embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** have been applied to enhance ecological connectivity. Where possible, areas of land located within the Order Limits identified as having potential to become of particular importance to biodiversity and contribute to enhanced landscape scale ecological connectivity if suitable nature recovery actions are carried out, known as 'areas that could become of particular importance' (ACB) within the LNRS Local Habitat Map have been targeted with their suggested habitat type when developing the **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**, thereby providing enhanced opportunities for biodiversity within and around the Order Limits.
LIR-NCC-092	Ecology and Biodiversity (Policy Context –	6.12 Section 5.4 Biodiversity and Geological Conservation contains the key ecological decision-making policies.	An assessment of likely significant effects to European sites is set out in the **Shadow Habitat Regulations Assessment (sHRA) Report [AS-036].** The sHRA

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	Overarching national policy statement for energy (EN-1))	Paragraph 5.4.4 confirms the highest level of protection applies to European sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).	found no mechanism for impacts to European sites and the sHRA did not proceed to the Appropriate Assessment Stage. In its Relevant Representation, Natural England has agreed with the conclusion of the HRA that there are no likely significant effects to European Sites. This is reflected in the Statement of Common Ground between the parties.
LIR-NCC-093	Ecology and Biodiversity (Policy Context – Overarching national policy statement for energy (EN-1))	6.13 For East Pye, where barbastelle populations and protected habitats may connect with designated sites, the adequacy of Habitats Regulations Assessment will be paramount.	The Applicant refers to its response to LIR-NCC-092. Barbastelle bats are not a qualifying feature of the identified European sites within the sHRA, and so do not form part of the assessment within the sHRA. An assessment of potential effects to Barbastelle bats are set out within ES Volume 1**, Chapter 8 – Ecology and Biodiversity [APP-044].**
LIR-NCC-094	Ecology and Biodiversity (Policy Context – Overarching national policy statement for energy (EN-1))	6.14 Paragraph 5.4.18 is particularly important since it requires applicants to clearly set out effects on: • designated ecological sites • protected species • priority habitats • priority species • irreplaceable habitats.	An assessment of potential effects to designated ecological sites, protected species, priority habitats, priority species, irreplaceable habitats is clearly set out within ES Volume 1**, Chapter 8 – Ecology and Biodiversity [APP-044].**

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LIR-NCC-095	Ecology and Biodiversity (Policy Context – National policy statement for electricity networks infrastructure (EN-5))	6.15 The National Policy Statement for Electricity Networks Infrastructure (EN-5) is also relevant. Paragraph 2.5.1 explains that the linear nature of electricity networks infrastructure may provide opportunities to reconnect important habitats by creating green corridors, developing biodiversity stepping zones, and reinstating appropriate hedgerows. It also notes that such infrastructure can provide opportunities to improve public access to the environment, for example by enabling footpaths and cycleways to be delivered alongside associated environmental enhancements.	Compliance with Paragraph 2.5.1 of NPS EN-5 is set out within the **Policy Compliance Document [REP1-076]**. The design of the Scheme has been informed by an environmentally led approach, with habitat considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting.
LIR-NCC-096	Ecology and Biodiversity (Impacts)	6.16 The Environmental Statement identifies a highly sensitive ecological baseline, including: • Internationally designated sites within 10km including Norfolk Valley Fens SAC and The Broads SAC. (Table 8.8; paragraphs 8.9.2 8.9.17). • Ten SSSIs within 5km, including Shotesham-Woodton Hornbeam	The Applicant notes this comment.

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		Woods SSSI, Hedenham Wood SSSI and Pulham Market Big Wood SSSI. (paragraph 8.9.18). • County Wildlife Sites including Fritton Grange Meadows CWS and Lower Spring Wood CWS, through which the cable route passes. (paragraphs 8.9.47-8.9.48). • Nineteen Roadside Nature Reserves within the study area. (paragraph 8.9.91). • Irreplaceable habitats including 31 ancient woodland parcels, lowland fen habitat and ancient/veteran trees. (paragraphs 8.9.133-8.9.160). • Extensive priority habitats including hedgerows, ponds, rivers, lowland deciduous woodland, floodplain grazing marsh and reedbed. (paragraphs 8.9.179 onwards). • Nationally important bat populations, particularly barbastelle bats. The ES records that the Order Limits fall within the 6km Core Sustenance Zones (CSZs) of nine known barbastelle maternity colonies and that barbastelle activity	

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		was recorded at every survey location. The ES correctly attributes national importance to the bat resource. (Table 8.13 and baseline assessment).	
LIR-NCC-097	Ecology and Biodiversity (Impacts)	6.17 The ES concludes that construction, operational and decommissioning effects are either negligible and not significant or beneficial as a result of habitat creation and Biodiversity Net Gain. The ES states that no significant adverse residual ecological effects are anticipated following implementation of mitigation measures. (paragraphs 8.5.13-8.5.14; Section 8.11 Residual Effects).	The Applicant notes this comment.
LIR-NCC-098	Ecology and Biodiversity (Impacts – County Wildlife Sites)	6.18 A key consideration for East Pye is the direct crossing of Fritton Grange Meadows CWS and Lower Spring Wood CWS via the cable route. (paragraph 8.9.48). The applicant states that: • HDD construction techniques will be used • a minimum 30m buffer will be applied • pollution prevention measures will be secured through the CEMP	The Applicant notes this comment.

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		• construction effects will therefore be negligible and not significant. (paragraphs 8.9.53-8.9.56).	
LIR-NCC-099	Ecology and Biodiversity (Impacts – County Wildlife Sites)	6.19 For operation, the ES relies on buried fluid-free cables, continued 30m buffer zones and cessation of agricultural activities. It therefore concludes negligible effects and no residual impacts. (paragraphs 8.9.59-8.9.63). While the ES concludes negligible effects, the CWSs are directly crossed by the scheme and therefore reliance is placed heavily on mitigation assumptions and long-term management commitments.	The Applicant notes this comment. Commitments are made within the **Outline CEMP [REP1-058]**, **Outline LEMP [REP1-064]** and **Outline OEMP [REP1-060]** of which detailed plans are required to be approved by way of Requirements, secured in the **Draft DCO [REP1-014].**
LIR-NCC-100	Ecology and Biodiversity (Impacts – Ancient Woodland)	6.20 Ancient woodland is treated as an irreplaceable habitat and 31 ancient woodland parcels were identified within 2km of the Order Limits. Six parcels are directly adjacent to the development area. (paragraphs 8.9.133-8.9.137). The applicant states: • no direct impacts will occur; • a minimum 30m buffer will be maintained; • works will comply with BS5837;	The Applicant notes this comment.

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		• planting will improve connectivity between woodland blocks. (paragraphs 8.9.137-8.9.141).	
LIR-NCC-101	Ecology and Biodiversity (Impacts – Ancient Woodland)	6.21 The resulting construction, operational and decommissioning effects are all assessed as negligible and not significant. (paragraphs 8.9.142, 8.9.151 and 8.9.158). The ES assumes that 30m buffers are sufficient to avoid indirect impacts and that enhanced landscape planting will offset ecological severance effects. These assumptions should be tested, particularly in relation to ancient woodland function and associated species.	The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and illustrated on **ES Volume 2, Figure 4.1 Indicative Masterplan [REP1-025]**, include a minimum 30m buffer applied to all ancient woodland, thereby reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges). Within this 30m buffer habitat creation and enhancement will be undertaken. The proposed implementation, management and monitoring of the landscape measures and features during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through Requirement 7 in the **Draft DCO [REP1-014]**.
LIR-NCC-102	Ecology and Biodiversity (Impacts – Hedgerows)	6.22 Hedgerows form the principal ecological network across the site. The ES acknowledges that temporary hedgerow losses will occur in places but states that: • HDD will avoid removals in 17 locations;	The Applicant notes this comment.

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		• new hedgerows will be created; • existing hedgerows will be enhanced. (paragraphs 8.9.208-8.9.209).	
LIR-NCC-103	Ecology and Biodiversity (Impacts – Hedgerows)	6.23 Construction effects are assessed as negligible. (paragraph 8.9.210). Operationally, the applicant predicts a net gain in hedgerows and trees with habitat management producing a moderate beneficial effect that is significant at a local scale. (paragraphs 8.9.214-8.9.216). Hedgerow severance is a key issue for bats, dormice, birds and landscape connectivity. The ES assumes temporary losses can be fully offset through future creation and enhancement.	The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]** include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. While it is acknowledged that there will be some limited hedgerow loss during construction, this will be temporary, with gaps to facilitate access being reduced in width as much as possible, as well as reinstatement being undertaken on completion of works. Furthermore the **Biodiversity Net Gain report [APP-218]** demonstrates that the project has the potential to deliver significant biodiversity gains including a minimum of 25% gain for hedgerows ; secured via Requirement 9 in the **Draft DCO [REP1-014]**. The overall improvement to hedgerow extent and function, as well as more sympathetic long-term

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			management will convey benefits to both commuting and foraging bats, and other species.
LIR-NCC-104	Ecology and Biodiversity (Impacts – Hedgerows)	6.24 The ES Non-Technical Summary identifies additional small areas of land associated with highway visibility splays and land required to accommodate abnormal indivisible loads, which could involve highway works, temporary removal of street furniture and vegetation removal. The County Council is concerned that the Preliminary Arboricultural Impact Assessment does not appear to consider these matters in sufficient detail.	The Applicant will seek to agree traffic management measures with the Local Highway Authority along roads and at site accesses that avoid the need for removal of vegetation. This could include temporary speed reductions, use of traffic marshals and vehicle booking systems to manage and control vehicle movements. Proposed management measures are set out in section 7 of the **Outline Construction Traffic Management Plan [REP1-068].** A detailed arboricultural impact assessment will be undertaken prior to construction, following the pre-construction tree survey as set out in Table 3.2 of the **Outline CEMP [REP1-058]**.
LIR-NCC-105	Ecology and Biodiversity (Impacts – Hedgerows)	6.25 The absence of a quantified schedule of tree works for visibility, abnormal loads and highway improvements makes it difficult to understand the scale and acceptability of arboricultural impact. The impacts of tree works and removal on narrow rural roads could be significant and unacceptable. Where works are proposed to trees and hedges not under the control of the project, the Applicant should provide assurance that the relevant owners can	The Applicant will seek to agree traffic management measures with the Local Highway Authority along roads and at site accesses that avoid the need for removal of vegetation. This could include temporary speed reductions, use of traffic marshals and vehicle booking systems to manage and control vehicle movements. Proposed management measures are set out in section 7 of the **Outline Construction Traffic Management Plan [REP1-068]**

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		accommodate such works and that adequate mitigation is in place.	
LIR-NCC-106	Ecology and Biodiversity (Impacts – Barbastelle Bats)	6.26 This is arguably the most important ecological receptor, particularly around maintenance of connectivity and adequate buffers. The baseline identifies that: • the entire order limits area falls within multiple barbastelle maternity colony CSZs • known maternity colonies occur at Tyrells Wood, Little Wood, Brooke Wood, Spring Wood and Saxlingham Grove • barbastelle activity was recorded at every survey location • barbastelle was one of the most frequently recorded bat species across the site. 6.27 The ES therefore recognises a resource of national importance. Given the national importance attributed to barbastelle populations and the recorded activity levels, the uncertainty around roosting, commuting routes, habitat connectivity, woodland-edge use and core	The Applicant agrees with the notable importance of the barbastelle populations, with full details presented within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Further information on is **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]**. Including information on core sustenance zone (CSZ), activity levels, commuting and foraging habitat, and roosting resource. Within their SOCG Natural England has not raised any issues with the adequacy of the baseline data used to inform the ES. As such the applicant does not consider there to be unresolved issues. The landscape and scheme design has taken the presence of barbastelle bats into consideration, providing increased field boundary margins and a significantly increased hedgerow linear network for connectivity to wider habitats. Further information is found in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**

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		sustenance zones are highly important unresolved issues.	
LIR-NCC-107	Ecology and Biodiversity (Impacts – Lowland Fen)	6.28 The ES identifies lowland fen as irreplaceable habitat linked to Hempnall Beck and Fritton Grange Meadows. (paragraphs 8.9.110-8.9.111). Mitigation relies on: • 30m buffers • pollution prevention • HDD beneath sensitive areas • water environment controls. (paragraphs 8.9.116-8.9.117). 6.29 The applicant concludes there will be no significant adverse effects during construction, operation or decommissioning. (paragraphs 8.9.117-8.9.128; 8.9.131-8.9.132). In paragraph 8.9.117 the applicant places reliance on the outline surface water drainage strategy (oSWDS). The County Council considers the drainage strategy is inadequate for several reasons, including a lack of design detail for the development platforms, access tracks and construction compounds. The drainage strategy cannot be relied on to mitigate the impacts of	<u>Ecology:</u> Commitments are made within the **Outline CEMP [REP1-058]**, **Outline LEMP [REP1-064]** and **Outline OEMP [REP1-060]** of which detailed plans are required to be approved by way of Requirements, imposed on the DCO. <u>Water Environment:</u> Temporary construction compounds will incorporate surface water management and pollution management measures including the use of bunding, silt lagoons and filter drains as set out and secured within the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**. As such, pollution and surface water runoff will be appropriately managed for the construction and decommissioning phases of the Scheme. **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy Report [REP1-052 and REP1-054]** provides details of outline surface water drainage arrangements for the BESS, National Grid Substation, Project Substations, standalone inverter/converter units and access tracks.

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		sediment mobilization or pollution events during construction.	This report was updated at Deadline 1 to provide network modelling for the Project Substations in Sub-Sites 4B, 5A, 7F and 10C, network modelling of swales for a length of access track within Sub-Site 4B and conceptual drainage drawings for the remainder of the access tracks for the wider Scheme. The detailed design will be developed for approval by the Lead Local Flood Authority.
LIR-NCC-108	Ecology and Biodiversity (Impacts – Watercourses and Hempnall Beck)	6.30 The proposed cable route crosses watercourses including Hempnall Beck. (paragraph 8.9.247). The ES states: • HDD will be used • cable depth will be at least 5m below riverbed level • 10m and 30m ecological buffers will be employed • construction effects are negligible. (paragraphs 8.9.247-8.9.251). 6.31 The applicant predicts operational ecological benefits due to enhanced riparian corridors and cessation of intensive agriculture. (paragraphs 8.9.258-8.9.259). However, this fails to grapple with the insufficiency of construction-phase drainage arrangements in the oSWDS.	The Applicant refers the County Council to the response for LIR-NCC-107.

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LIR-NCC-109	Ecology and Biodiversity (Impacts – White-clawed Crayfish)	6.32 The Council notes that evidence concerning white-clawed crayfish has been provided to the applicant by interested parties but does not appear to have been taken into account in the application. Although the habitat has been described by the applicant as sub-optimal, the submitted information includes plausible evidence of a remnant population of white clawed crayfish in the River Pye. The River Pye has not been subject to species-specific survey or impact assessment and, as a result, the baseline and potential effects on this protected species remain uncertain. 6.33 The Council would therefore expect the applicant to undertake appropriate further investigation and to engage with relevant local organisations, including Norfolk Rivers Trust and the Zoological Society of East Anglia, to establish whether their projects or local records provide information on crayfish locations in the area. The findings should inform an updated assessment of potential construction, operational and decommissioning effects and any	The Applicant refers the County Council to the response for LIR-NCC-088.

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		necessary avoidance, mitigation, licensing and monitoring measures.	
LIR-NCC-110	Ecology and Biodiversity (Impacts – Biodiversity Net Gain)	6.34 A recurring theme throughout the chapter is reliance on habitat creation, grassland establishment, woodland planting, pond creation, hedgerow enhancement and landscape connectivity improvements secured through the Outline LEMP and BNG Strategy. 6.35 The ES predicts significant local beneficial effects for: • hedgerows (paragraph 8.9.216) • ponds (paragraph 8.9.239) • rivers and riparian habitat (paragraph 8.9.259) • woodland habitat (paragraph 8.9.281) • scrub habitat (paragraph 8.9.332) • neutral grassland (paragraph 8.9.352) • ditch habitat (paragraph 8.9.377).	The Applicant notes this comment.
LIR-NCC-111	Ecology and Biodiversity (Requirements,	6.36 Ecological mapping and assessment should be updated to account for Roadside Nature Reserves and relevant adjacent trees and hedges, and mitigation should	The Applicant notes this comment. Roadside Nature Reserve distribution was determined via purchased data in 2025 and provided within the **ES Volume 2, Figure 8.3 Non-Statutory Designated Sites within**

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	Obligations and Other Measures)	be assessed and secured for species-rich green lanes and other non-designated ecological assets.	**2km [APP-088]**, this data will be reassessed to confirm if new sites have been designated in the meantime, with information updated at Deadline 3 if required. All habitats (including 'ecological assets') within the Order Limits have been identified and mapped in accordance with UKHab V2 methodology, with methodologies agreed through scoping. Habitat mapping is provided within **ES Volume 2, Figure 8.6 Habitat Survey Results [APP-091]**.
LIR-NCC-112	Ecology and Biodiversity (Requirements, Obligations and Other Measures)	6.37 Robust biosecurity, pollution prevention and sediment management controls should be secured for white-clawed crayfish and downstream habitats. Protected species mitigation must be robust, deliverable and secured through appropriate control documents	The Applicant refers the County Council to the response for LIR-NCC-088.
LIR-NCC-113	Ecology and Biodiversity (Requirements, Obligations and Other Measures)	6.38 The published Norfolk and Suffolk Local Nature Recovery Strategy should be used when determining post-development gains.	Whilst the Schemes design evolution was progressed prior to the publication of the LNRS on 31st October 2025, the embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** have been applied to enhance ecological connectivity. Where possible, areas of land located within the Order Limits identified as having potential to become of particular importance to biodiversity and contribute to enhanced landscape scale ecological connectivity if

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			suitable nature recovery actions are carried out, known as 'areas that could become of particular importance' (ACB) within the LNRS Local Habitat Map have been targeted with their suggested habitat type when developing the **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**, thereby providing enhanced opportunities for biodiversity within and around the Order Limits.
LIR-NCC-114	Ecology and Biodiversity (Requirements, Obligations and Other Measures)	6.39 The Applicant should also provide a schedule of tree and hedge works required for visibility splays, abnormal indivisible loads and other highway works; clarify whether works are required to trees and hedges outside its control and how landowner agreement and mitigation would be secured; and improve the Tree Constraints Plan and Tree Impact Plan through clearer overview mapping and more readily navigable base mapping.	The **Outline CEMP [REP1-058]** sets out management measures in relation to tree pruning, including an Arboricultural Method Statement will be adopted and that the pruning works will be implemented by a suitably qualified arboricultural Contractor working in accordance with British Standard 3998: 2010 'Tree Work – Recommendations. The Applicant will review the Tree Constraints Plan and Tree Impact Plan and consider if it is required to be improved.
LIR-NCC-115	Archaeology (Summary)	7.1 The County Council considers that further archaeological assessment and mitigation are required. The key issues are uncertainty regarding the cumulative impacts of piling and cabling on below-ground archaeological remains, and the need for trial trenching across areas of the scheme not previously tested.	The Applicant notes that there is a commitment to further archaeological fieldwork across the Site, as detailed within **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**. The specific comments regarding piling and trial trenching have been addressed in more detail in LIR-NCC-117 – LIR-NCC-122.

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LIR-NCC-116	Archaeology (Policy Context)	7.2 EN-1 requires applicants to assess likely significant effects on the historic environment, including below-ground and cumulative effects, and to provide sufficient information for those effects to be adequately understood: see paragraphs 5.9.11 to 5.9.14. Where there is a high probability of as-yet-undiscovered archaeological assets, paragraph 5.9.22 provides for requirements securing appropriate procedures for their identification and treatment; paragraph 5.9.20 addresses written schemes of investigation. Non-designated archaeological assets demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites are subject to the policies for designated heritage assets under paragraphs 5.9.7 and 5.9.8. Solar-specific policy on below-ground effects, desk-based assessment, field evaluation and investigative work is contained in EN-3 paragraphs 2.10.99 to 2.10.107, with micrositing addressed in paragraphs 2.10.129 and 2.10.130.	The Applicant agrees with the paragraphs of EN-1 and EN-3 cited here by NCC and confirms **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046**] and its associated appendices **[APP-165 – APP-173, AS-020 – AS-024]** have been produce in accordance with NPS EN-1 and EN3.
LIR-NCC-117	Archaeology (Impacts)	7.3 The County Council has previously raised concerns about the lack of detail regarding cabling associated with the PV arrays means that the cumulative impacts	The Applicant assumes that NCC is referring to Relevant Representation 37 (NCC-037) here, rather than NCC-014.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		of piling and cabling are not known. Any assessment of impacts on below-ground archaeology is therefore uncertain and provisional. In its response to relevant representations14, the applicant claims that "relatively low levels of below-ground disturbance are expected, depending on the exact layout and construction methods that are to be utilized (typically in the region of 5%-7% of site area)". But the impacts from cabling are spread out very widely within each solar array area, so the 5%-7% figure underplays the spread of impacts and therefore the likelihood that archaeological remains will be damaged.	It is further noted within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** as well as **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173]**, that trial trenching of all areas of impact of the Scheme at a level to be agreed with NHES that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling and cabling). The option for localised areas of above ground cabling to preserve significant archaeological remains in situ where it is not practicable or desirable to mitigate by archaeological excavation, will be available. Likewise, within the Solar PV Array areas of the Scheme, the targeted and localised use of concrete feet rather than piles to support the Solar PV structures will also be available.
LIR-NCC-118	Archaeology (Impacts)	7.4 The trial trenching undertaken appears to have focused on areas of archaeological potential identified from geophysical survey. The County Council considers that there has been an insufficient level of trenching in areas where the geophysical survey did not identify anomalies of potential archaeological origin. The results of non-invasive surveys are not definitive evidence of absence of below-ground archaeological remains. Archaeological	The Applicant agrees that the works detailed in **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]** has primarily targeted areas where geophysical survey (**ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey Report [AS-022]**) has identified archaeological potential, in addition to anomalies identified through aerial photography (**ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024]**) and existing entries on the Historic Environment Record, as detailed within **ES Volume 3, Appendix**

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		investigation is an iterative process. The results of non invasive surveys need to be robustly tested with trial trenching.	**10.2 – Archaeological Desk-Based Assessment [AS-020 – 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, however, very 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 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.
LIR-NCC-119	Archaeology (Impacts)	7.5 The County Council is in broad agreement with the Archaeological Mitigation Strategy, but significant differences remain regarding the cumulative impact of piling and cabling for the solar arrays and the need to test areas not previously trenched. The removal of piles may itself have a destructive effect on archaeological remains and should be mitigated at pre-construction stage.	The Applicant notes that paragraph 3.7 of **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** allows for trial trenching of all areas of impact of the Scheme at a level to be agreed with NHES that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling and cabling).

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			Impacts relating to the removal of piles has been addressed in LIR-NCC-120.
LIR-NCC-120	Archaeology (Impacts)	7.6 At row Norfolk County Council-042 of the applicant's response to relevant representations, the applicant claims that the impact of piling "would not compromise the integrity of the archaeological features, nor the ability to understand the 'archaeological site' should future archaeological investigation take place. The County Council submits that this rather misses the point that some archaeological remains are more sensitive than others. For example, it is never appropriate to allow human skeletal remains or pottery kilns to be impacted by piling without mitigation.	The Applicant agrees that it is inappropriate to allow human skeletal remains or pottery kilns to be impacted by piling without mitigation. Paragraph 3.11, under the heading 'Preservation in situ' of **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** states that "I*t has been agreed with NCCHES that the impact of piling for the panel support structures is of such a low level that it will not compromise the integrity of the archaeological remains or limit the ability to understanding the remains should archaeological investigation be carried out at a future date, with the proviso that certain archaeological features would need to be avoided or fully excavated. Such features would include (but are not limited to) structures, waterlogged remains, feature with high artefactual or environment potential, industrial features and human remains. Should such features be identified by the informative trenching, this would require either the adjustment of the pile layout to avoid particular archaeological features and/or the targeted use of concrete feet rather than piles to support the panel support structure*."
LIR-NCC-121	Archaeology	The Applicant should provide further detail of the cabling associated with the PV arrays so that its cumulative impacts with	The Applicant notes that details in respect of the Solar PV Arrays and electrical cabling associated with PV arrays has been provided within the **Design**

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	(Requirements, Obligations and other Measures)	piling can be assessed. Trial trenching should be undertaken or secured for areas not previously tested, including those where geophysical survey did not identify anomalies.	**Principles, Parameters and Commitments [REP1-078]**. The Applicant will also provide detailed layouts of cabling routes to NCC once they are available. As stated in LIR-NCC-118, further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching, as detailed within **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**. 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.
LIR-NCC-122	Archaeology (Requirements, Obligations and other Measures)	The approach to mitigating the effects of pile removal and other decommissioning activities on below-ground archaeological remains should be clarified. The County Council is in direct contact with the applicant and considers that agreement can likely be reached on post consent archaeological mitigation, provided that pre-consent issues relating to the impact of cabling and piling can be resolved.	The Applicant notes that section 11 of **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** titled 'Decommissioning' addresses pile removal and other decommissioning activities on below-ground archaeological remains. It states that "*a Decommissioning Strategy will be agreed with the Archaeological Advisor to the relevant Local Planning Authority (NCCHES) prior to decommissioning, which will be sufficient to safeguard any archaeological remains during the decommissioning phase*." The **Outline DEMP [REP1-062]** further notes in section 4.6 that a detailed DEMP would be agreed

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			with the Archaeological Advisor to the relevant planning authority prior to decommissioning. The guidance document *Archaeology and Solar Farms. Good Practice Guide* states in paragraph 3.8.4. that "*Specific methods for decommissioning works cannot be determined at the application stage. While an application could outline potential mitigation methods for decommissioning, these should remain flexible and would ultimately be secured through an Environmental Management Plan, to be approved by the Local Planning Authority, prior to works taking place*."
LIR-NCC-123	Transport and Access (Summary)	8.1 The County Council considers that the current transport strategy does not adequately address significant highway constraints for site accesses and routes and does not provide sufficient mitigation. As a result, the current strategy cannot be supported in that respect.	The Applicant notes the comments regarding the current transport strategy. The Applicant will continue to engage with Norfolk County Council regarding the proposed construction transport strategy.
LIR-NCC-124	Transport and Access (Policy Context)	8.2 EN-1 and EN-3 provide the principal national policy framework for assessing the traffic and transport effects of the scheme. Section 5.14 of EN-1 applies to all energy infrastructure, while paragraphs 2.10.27 to 2.10.37, 2.10.112 to 2.10.118 and 2.10.131 to 2.10.136 of EN-3 address accessibility, public rights of way and construction traffic for solar photovoltaic	The Applicant has applied the principal national policy framework for traffic and transport through the assessment presented in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and supported by the **Transport Assessment [APP-174 to 177], Outline Construction Traffic Management Plan [REP1-068], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]** and

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		development. The policies must be read together and alongside the general assessment principles in EN-1. 8.3 EN-1 recognises that the movement of materials, goods and personnel during construction, operation and decommissioning can have economic, social and environmental effects, including congestion, noise, air pollution and greenhouse gas emissions. Where a project is likely to have significant transport implications, the Environmental Statement should include a vision for transport and an assessment of potential effects, prepared in consultation with the relevant highway Authority's (EN-1 paragraphs 5.14.5). The assessment should address disruption to transport services and infrastructure and be based on appropriate, up-to date evidence and reasonable future scenarios (EN-1 paragraph 5.14.7).	**Outline Operational Traffic Management Plan [APP-202].** Together they set out the assessment methodology and the management and mitigation measures for the Scheme.
LIR-NCC-125	Transport and Access (Policy Context)	8.4 The mitigation hierarchy applies. EN-1 requires demand-management measures to be considered before new transport infrastructure where feasible and operationally reasonable, including consolidating, retiming and rerouting trips (EN-1 paragraph 5.14.12). Where	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 the **Transport Assessment [APP-174 to 177], Outline Construction Traffic Management Plan [REP1-068], Outline Public Rights of Way and Permissive**

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		substantial HGV traffic is expected, the Secretary of State may control vehicle numbers and routes, require suitable parking and driver facilities, and secure arrangements for reasonably foreseeable abnormal disruption EN-1 paragraphs 5.14.13 to 5.14.15). Applicants should also have regard to Government guidance on abnormal indivisible loads. Development should only be refused on highway grounds where there would be an unacceptable impact on highway safety, severe residual cumulative impacts on the road network, or inadequate consideration of active, public or shared transport access.	**Paths Management Plan [APP-203]** and **Outline Operational Traffic Management Plan [APP-202].** Together they set out the assessment methodology and the management and mitigation measures for the Scheme.
LIR-NCC-126	Transport and Access (Policy Context)	8.5 EN-3 identifies construction access as a significant siting consideration for solar farms because sites are often located in rural areas served by minor roads. Applications should include the full extent of access routes and assess their effects. Applicants should assess the available delivery routes, use a reasonable worst case where the source of materials is unknown, and demonstrate that every relevant road and bridge can accommodate the weight, volume and width of proposed vehicles (EN-3	The Applicant has considered construction access for traffic and transport including cumulative effects on vehicle routes, applying a worst case and a vision led approach through the assessment presented in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and supported by the **Transport Assessment [APP-174 to 177], Outline Construction Traffic Management Plan [REP1-068], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]** and **Outline Operational Traffic Management Plan [APP-202].** Together they set out the assessment methodology

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		paragraphs 2.10.27 to 2.10.31 and 2.10.112 to 2.10.117). Where modifications are required, these should be identified and assessed. Cumulative effects associated with shared routes through towns and villages should be addressed through a vision-led transport assessment prepared in consultation with the local highway authority (EN-3 paragraph 2.10.118).	and the management and mitigation measures for the Scheme.
LIR-NCC-127	Transport and Access (Policy Context)	8.6 EN-3 also expects public rights of way to remain open during construction so far as practicable and safe, with users protected where routes border or cross the site. The layout should support continued recreational use and maximise opportunities for enhancement, supported by an outline Public Rights of Way Management Plan (EN-3 paragraphs 2.10.29 to 2.10.37).	The Applicant acknowledges the principle in EN-3 regarding Public Rights of Way. An **Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme.

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			The Applicant would welcome the opportunity for further engagement with NCC PRoW officers.
LIR-NCC-128	Transport and Access (Policy Context)	8.7 The local highway authority may seek controls over construction vehicle numbers and routing, coordination of abnormal loads and deliveries, restoration of roads and verges, and liaison before construction. These provisions support the County Council's preference for a limited number of suitable accesses, maximum use of internal haul routes and cable route corridors, and enforceable controls over HGV and abnormal load movements.	The Applicant notes the comments and will continue to engage with Norfolk County Council regarding the proposed construction transport strategy and control measures. Current proposed management measures are set out in section 7 of the **Outline Construction Traffic Management Plan [REP1-068]**
LIR-NCC-129	Transport and Access (Impacts – Site Accesses)	8.8 In general, sites should be served from the nearest suitable B road, with cable route corridors and internal haul routes used to reduce the number and length of HGV movements on minor rural roads. Crossing (rather than traversing the length of) minor rural roads minimizes conflict with local traffic and vulnerable road users.	The use of internal haul routes have been proposed, where practicable, to minimise construction vehicles on the Local Road Network. The presence of avoidance areas and other ecological environmental constraints along sections of the CRC are such that some local roads are required to be used to facilitate the construction of the Scheme. Site access design, swept-path analysis and visibility splays have been undertaken to evidence suitability for access by construction vehicles, and are shown in the **Transport Assessment [APP-174 to 177]**. The management and mitigations detailed within the **Outline CTMP [REP1-068]** have also been designed to minimise and mitigate effects on the Local Road Network.

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LIR-NCC-130	Transport and Access (Impacts – Site Accesses)	8.9 For sites 1A to 1D and the BESS, there should be one principal construction access from the B1134 Station Road, with CRC1 and CRC2 used internally. Access A03 should not be used for construction traffic, although it may be retained as a BESS emergency access; A04 is acceptable in principle subject to visibility, verge maintenance and traffic management; A05 should be limited to haul crossing and maintenance use; and A06 should be removed, with movements routed internally via CRC2 and A05.	Two accesses are proposed on B1134 Station Road to accommodate access to the BESS Site and Sub-Sites 1A-D. The two accesses are both existing site accesses and are proposed to facilitate access to the different land parcels. They also provide flexibility during construction where (subject to the final construction programme) works in the different Sub-Sites could potentially occur at different times. It would also avoid concentrating vehicle movements at a single access. A05 is confirmed as only a haul crossing and maintenance access. A03 is confirmed as a BESS emergency access and its use as a construction access along with access A06 will be discussed with NCC.
LIR-NCC-131	Transport and Access (Impacts – Site Accesses)	8.10 For sites 2A and 2B, the County Council does not support new or enhanced accesses from the A140. The temporary HDD compound at A09 should be accessed via A11 on Wood Lane. Site 2B should be served internally via CRC2 and A05. Site 2A should be accessed via CRC3 and Site 2C should be accessed via CRC shown on land west of the A140.	Site 2A and 2B have an existing access within separate laybys (northbound) on the A140. It is proposed that during construction each layby is closed to general traffic and only accessible to works vehicles with appropriate signage installed. This is considered to be the safest approach. Overlap between the closure of each layby would be kept to a minimum. The highway crossing point for CRC2 on Frith Way is in close proximity to a roadside nature reserve located to the east of the crossing point on the north side of Lodge Road. In addition, a Great Crested Newt pond is located to the south of Frith Way/Lodge Road opposite the roadside nature reserve. On the basis of these constraints, it was considered less impactful to

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			use the existing access in the layby on A140 rather than use CRC2 as a haul route to access Sub Site 2B. An avoidance area bisecting CRC3 (CRC3A) has been included due to the presence of trees, hedgerows, ditches and overhead lines along Carpenter's Walk. Carpenters Walk is also a private road and a PRoW. This is shown in Appendix A, Sheet 17 of the **Outline Cable Route Construction Statement [REP1-080]** and detailed in Table 2.1, Page 7. The avoidance of ditches is highlighted as a consideration relating to the cable route corridor on Page 65 of the **Design Approach Document [APP-212]**. As a result of this combination of factors, CRC3 is not considered feasible for use as a haul route between Sub-Site 2A and 2B. Sites 2A-C (access via A140) – meeting minutes date 15 October 2024: "TH raised if there would be any challenges with sites in the south-west (site areas 2) accessing directly from A140. MD noted that this would be feasible, however the access point would need to be considered carefully and appropriate traffic management must be proposed. JC added that the QE2 hospital project has agreed to left-in/left-out movements only for direct access onto A140." Left-in/left-out movements are proposed for site accesses on A140, alongside additional management and mitigation measures detailed in **Chapter 7 of the Outline CTMP [REP1-068]**.

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			The Applicant acknowledges this comment and the access on Wood Lane. The proposed access to the temporary CRC compound via access A09 on A140 is considered to cause the least impact, due to the presence of residential and commercial properties along Wood Lane. Traffic management measures, as detailed within the **Outline CTMP [REP1-068]** include restricting movements on A140 to left-in/left-out only.
LIR-NCC-132	Transport and Access (Impacts – Site Accesses)	8.11 Site 3 should utilise CRC6 but A34 acceptable given the limited forecast traffic. A crossing of Lundy Green can be supported, but no vehicular use along Lundy Green would be supported.	The Applicant notes the comments and confirms the use of access A34 and the crossing point at Lundy Green and no vehicles traversing through Lundy Green.
LIR-NCC-133	Transport and Access (Impacts – Site Accesses)	8.12 For sites 5A and 5B, there should be only one access point and either A23 or A24 should serve both abnormal loads and construction traffic from the B1527. A25 should be relocated opposite A26 to provide a haul-route crossing, with maintenance access also taken from A23 or A24. The two bridges on this route, structures TM29302 and TM29303, require the applicant to conduct a structural assessment before use by abnormal loads or HGVs can be accepted.	Access A24 was included to provide flexibility for access to Sub-Site 5A subject to final design and sequencing of works associated with the Sub-Site and substation. The Applicant will continue dialogue with the Consultee regarding this access point. Access A25 and A26 are both required to access Sub-Site 5B. Both are existing field accesses and using them avoids having to create a field boundary crossing point through an existing hedgerow therefore avoiding ecology impacts. The Applicant can confirm that the structures mentioned have been checked with NCC with the following response received. *TM29301 is a relatively new armco culvert constructed in 2019 as part of the*

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			roundabout installation works, TM29302 is a 200mm diameter pipe and TM29303 is a 900mm circular masonry culvert. All assets are in good condition and are capable of carrying normal traffic i.e. C&U and AW traffic up to 40/44 tonnes.
LIR-NCC-134	Transport and Access (Impacts – Site Accesses)	8.13 The access strategy for site 6 is broadly acceptable, but A35 to A38 should be consolidated into as few access points as practicable.	Access A38 is for construction access to the CRC compound located on the north side of the B1527. Sub-Site 6 will be accessed from access A35.
LIR-NCC-135	Transport and Access (Impacts – Site Accesses)	8.14 The County Council cannot support the present strategy for sites 7 to 9. The Krons is unacceptable for HGV movements, and Fairstead Lane west of its junction with the A140 remains within the Order Limits despite the previous understanding that it would not be used for general construction access. The applicant should make greater use of CRC8, CRC9, CRC10 and CRC13. Construction sequencing is not accepted as justification for routing traffic onto unsuitable roads; the programme should be adjusted so that the relevant haul routes and sites can be developed in a coordinated manner.	The Applicant acknowledges NCCs view regarding The Krons. The Applicant believes The Krons provides the best solution to access Sub-Sites 7A-F and the internal haul route with the introduction of an appropriate traffic management and construction vehicle management protocol. The Applicant also acknowledges NCCs request to utilise CRC8 instead of The Krons and will work with NCC highways and ecology teams to consider the potential impacts of both options and agree on a preferred solution. The justification for not using CRC8 as a haul route is set out below for reference. Several avoidance areas are located along CRC8: • CRC8A: Relates to avoiding the removal of trees and hedges located in an established mature tree

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			belt that is part of the field boundary to Sub-Site 7K; • CRC8B: Relates to avoiding the removal of trees and hedges located in an established mature tree line that connects two SSSI's and ancient woodland blocks (Little Wood and Winter's Grove) located to the east and west of the tree line; and • CRC8C: Relates to avoiding a watercourse (tributary of Hempnall Beck), hedgerows and trees. Avoids significant aquatic, hydrology and drainage impacts. The locations of these avoidance areas are shown in Appendix A, Sheet 8 of the **Outline Cable Route Construction Statement [REP1-080]**, and detailed in Table 2.1, Page 6 of the **Outline Cable Route Construction Statement [REP1-080]**. Given the locations of the avoidance areas along CRC8, it is not proposed for this cable route section to be utilised as a haul route between Sites 7A-K, 8A-B and 9. Additional factors have also impacted the suitability of utilising CRC8 as a haul route. This includes potential constraints arising from the sequencing of the construction programme, and sites not being active simultaneously to facilitate access via a CRC8 haul route. The use of internal haul routes between sites has been proposed for Sites 7A-F, Sites 7G-L and Sites

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			8A-B. The Applicant has discussed the access strategy for these sites extensively and has sought to internalise vehicle movements along CRC and interconnecting sites wherever practicable as set out in the Technical Notes appended to the **Transport Assessment [APP-174 to 177]**. Due to the ecological and environmental constraints with regards to utilising CRC8 as a haul route, the proposed access routes and use of existing access points as set out in the **Outline CTMP [REP1-068]** as considered the most suitable, alongside the proposed management and mitigation measures, also set out in the **Outline CTMP [REP1-068]**.
LIR-NCC-136	Transport and Access (Impacts – Site Accesses)	8.15 For sites 10A to 10D, access should be consolidated to either A61 or A62. A60 and any additional B1332 access to site 10C are not supported. A64 should be removed, with CRC14 and A65 used for site 10E.	A60 is a highway access point for the construction phase, and will facilitate the temporary construction phase of the CRC. Whilst trenchless construction methods have been agreed for A and B roads, including B1332, access is required for the construction of the CRC9. Due to the inclusion of avoidance areas along CRC9 (CRC9B), as shown in Sheet 6 the **Outline Cable Route Construction Statement [REP1-080]**, trenchless construction methods are proposed. The CRC9B avoidance area relates to the crossing of Lower Spring Wood County Wildlife Site, woodland and veteran hedgerows. Resultantly, access to the section of CRC between CRC9B and B1332 is required to be made from access A60.

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			Access A61 and A62 are considered necessary for the safe and efficient construction of Sub-Sites 10A to 10D, and to accommodate flexibility during the construction programme. The Applicant will continue dialogue with the Consultee regarding these access points. A64 is a highway access point to facilitate the temporary construction phase of CRC14. This access is proposed to minimise potential hedgerow removal between CRC14 and Sub-Site 10E. The Applicant will continue dialogue with the Consultee regarding this access point.
LIR-NCC-137	Transport and Access (Impacts – Public Rights of Way)	8.16 There is expected to be substantial interaction with public rights of way and bridleways across the whole sites but especially in and around sites 1A to 1C, the BESS, CRC1 and sites 5A and 5B. The applicant has not yet provided sufficient detail of measures to manage conflicts between construction traffic and these routes or agreed the approach in principle with the County Council. Controlled crossings, banksmen, advance warning signs and defined crossing points may be appropriate but must be specified and secured for particular locations rather than left as general commitments.	The Applicant acknowledges the concerns raised regarding Public Rights of Way and community wellbeing and notes the importance of ensuring that mitigation measures are clear, effective and deliverable. Community wellbeing has been addressed in the **Mental Health and Wellbeing Addendum [REP1-107]** In relation to transport matters, the effects of the Scheme on Public Rights of Way have been assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**. An **Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme. The Applicant would welcome the opportunity for further engagement with NCC PRoW officers.
LIR-NCC-138	Transport and Access (Impacts – Traffic Monitoring and Compliance)	8.17 The applicant should confirm that its baseline traffic data represent current conditions and are not figures which reflect traffic patterns before the introduction of the Long Stratton bypass. Approved HGV routes for each site should be fixed in the final construction traffic management plan, supported by monthly traffic data, contractor route monitoring and, where proportionate, GPS-based compliance measures. The undertaker should remain responsible for compliance by all contractors and third-party drivers, with an effective community reporting and investigation process to handle breaches.	The Applicant confirms that traffic data collection was undertaken in Autumn 2024 and Spring 2025 when the Long Stratton Bypass was still under construction. The Applicant considers this data remains appropriate for the purposes of the assessment. The Long Stratton Bypass principally provides an alternative route for strategic north-south movements and does not materially alter the wider route choice opportunities available across the study area. The assessments have been undertaken using forecast traffic conditions and are focused on the assessment of development-related changes in traffic rather than the precise distribution of existing traffic flows on individual links. The Applicant considers that the baseline data provides a robust basis for the assessment and that

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			the collection of additional post-opening traffic data would not materially influence the conclusions of the assessment undertaken. Additional traffic surveys are therefore not considered necessary. The Applicant agrees that approved HGV routes for each site will be fixed in the final CTMP. The applicant will continue dialogue with NCC on an appropriate monitoring, community reporting and compliance process.
LIR-NCC-139	Transport and Access (Impacts – Traffic Monitoring and Compliance)	8.18 Further clarification should be provided on whether water for construction use (including welfare and dust suppression) would be delivered by HGV to any site, and whether these deliveries have been included in assessment figures.	Water provision during construction will be provided through tankering. The trip generation estimates provided are inherent of the tankering movements and have therefore been assessed.
LIR-NCC-140	Transport and Access (Impacts – Abnormal Indivisible Loads (AILs))	8.19 The applicant should confirm the number of transformer and cable-drum deliveries for each delivery point. AIL tracking drawings shown at attachment 6 of appendix D of the Transport Assessment15 use an Ordnance Survey base; a topographical survey is required to demonstrate that routes are physically viable for the proposed vehicles. This is a particular concern for The Street and Church Hill in Saxlingham Nethergate including at the moat edge of the Old	The Applicant is not able to provide exact numbers of transformer and cable drum deliveries at this stage. This will be confirmed at detailed design stage once the electrical design is finalised and will be subject to the AIL management measures are set out in **point 6.4 of the Outline Construction Traffic Management Plan [REP1-068].** The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for

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		Hall16 and post-and-rail fencing opposite the school, and the historic boundary wall of the Old Rectory17 which abuts Church Hill.	route through Saxlingham Nethergate. The drawings are provided in **Part 3 of the Transport Assessment, ES Volume 3, Appendix 11.1 [APP-176] pages 58-60.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed response on this issue in **Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083].**
LIR-NCC-141	Transport and Access (Impacts – Abnormal Indivisible Loads (AILs))	8.20 Drawing number 24-1221.SPA08 showing the AIL swept path assessment for Saxlingham Nethergate seems to indicate that trimming and pruning may be required. Norfolk County Council officers observed during a site visit that the original boundary wall is within the hedge immediately abutting Church Hill. Loss of the fabric of the wall would result in substantial harm to a listed building, which is beyond the impact assessed in the ES.	The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in **Part 3 of the Transport Assessment, ES Volume 3, Appendix 11.1 [APP-176] pages 58-60.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed response on this issue in **Q1.8.3 in The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083**].
LIR-NCC-142	Transport and Access (Impacts – Abnormal	8.21 The ES and outline CTMP currently have no information about AIL delivery timing, the duration and frequency of	The Applicant is not able to provide details on timing, duration and frequency of parking restrictions at this stage. The Applicant is aware that for AIL movements

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	Indivisible Loads (AILs))	parking restrictions, and whether movements would occur during the day, overnight or on Sundays. The applicant should provide this information to allow a clearer picture of amenity impacts for those living near proposed AIL routes. Timings are a concern because on the delivery route there is a pedestrian crossing in Saxlingham Nethergate immediately outside a school. The applicant should commit to scheduling AIL deliveries to avoid the most sensitive times for traffic safety including school drop-off or pickup times.	within Norfolk (and Suffolk) there is an embargo against 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 a weekend and during daylight hours to enhance visibility. This will be confirmed at detailed design stage and will be subject to the AIL management measures are set out in **point 6.4 of the Outline Construction Traffic Management Plan [REP1-068].**
LIR-NCC-143	Transport and Access (Impacts – Traffic Vibration Effects on Historic Buildings)	8.22 Where construction routes pass closely by historic buildings including listed buildings, the applicant should ensure that any potential vibration impacts are remediated. The applicant should commit to undertaking condition surveys, including a noise and vibration assessment, for houses and listed buildings on construction routes. Similar provision has been made for other DCOs, including Sizewell C, in which requirement 3518 provides that the applicant must submit a scheme identifying properties along the B1122 (a construction route for that project) where a pre construction survey will be necessary. In	The potential for vibration from construction traffic has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The assessment draws on the guidance referenced in BS 5228-2 and TRL Report 429. It indicates that vibration generated by HGV movements would typically be approximately 1 mm/s peak particle velocity (PPV) at 10 m, reducing to approximately 0.3 mm/s PPV at 50 m. A value of 3 mm/s PPV has been adopted as a conservative threshold for the avoidance of building damage, which is more stringent than the building-damage guidance referenced in BS 5228-2. As reported in Section 12.8 of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, vibration

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		that case the requirement was added at the request of the ExA.	generated by an HGV pass-by is expected to be approximately 1 mm/s peak particle velocity (PPV) at a distance of 10 m, reducing to approximately 0.3 mm/s PPV at 50 m. For standard structures, BS 5228-2 advises that vibration levels above 10 mm/s PPV would be required before building damage would be expected. The assessment nevertheless adopts 3 mm/s PPV as a conservative threshold for the avoidance of building damage, reflecting the potential presence of particularly sensitive or fragile buildings. At distances of approximately 10 m or more from an access road, vibration levels during HGV pass-bys are expected to be 1 mm/s PPV or below. The resulting effects at high-sensitivity receptors have been assessed as short-term, negligible to minor adverse and not significant. The assessment has also considered properties situated particularly close to proposed construction routes. The Old School on The Street and Manor Farmhouse on Broaden Lane have been identified as being within approximately 5 m of the road edge. Traffic surveys undertaken on The Street and Broaden Lane recorded rigid vehicles with four or more axles and articulated vehicles using these roads. Properties fronting these roads are therefore already likely to experience vibration from vehicle types comparable to those required for the Scheme.

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			The assessment of effects of 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 – APP-168]**. These documents note that environmental changes during the Construction Phase of the Scheme, particularly noise and vibration, are not expected to be any more than negligible. Construction vehicle routing has been developed in consultation with NCC 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 [REP1-068]**. Mitigation measures to control noise and vibration during construction are set out within the **Outline CEMP [REP1-058]**. The Applicant therefore considers that pre-and post-construction surveys of Listed Buildings is not required, as these assessments have concluded that there will be no direct impacts upon designated heritage assets (e.g. through vibration) by the Scheme.
LIR-NCC-144	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.23 The outline construction traffic management plan should be amended to secure the site-by-site access changes identified above, including the removal or restriction of unsupported accesses. HGV use of The Krons and general construction	The Applicant notes the comments regarding amending the **Outline CTMP [REP1-068].** The Applicant will continue to engage with Norfolk County Council regarding the proposed construction transport

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		access from the A140 end of Fairstead Lane should not be permitted, and construction sequencing should be revised where necessary to enable use of CRC8, CRC9, CRC10 and CRC13.	strategy and update the Outline CTMP accordingly if required.
LIR-NCC-145	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.24 Before routes can be approved, the Applicant should provide structural assessments for structures TM29302 and TM29303 and any other bridge proposed for HGV or abnormal-load use. An updated topographical survey and vehicle-tracking assessment should be provided for The Street and Church Hill in Saxlingham Nethergate, covering carriageway widths, the moat edge, fencing, highway boundaries and any temporary highway works or parking restrictions. The Applicant should confirm all abnormal load, transformer, cable-drum and water-delivery numbers, dimensions, routes, vehicle types and timings, and coordinate abnormal loads to minimise disruption.	The Applicant can confirm that the structures mentioned have been checked with NCC with the following response received. *TM29301 is a relatively new armco culvert constructed in 2019 as part of the roundabout installation works, TM29302 is a 200mm diameter pipe and TM29303 is a 900mm circular masonry culvert. All assets are in good condition and are capable of carrying normal traffic i.e. C&U and AW traffic up to 40/44 tonnes.* The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in **Part 3 of the Transport Assessment, ES Volume 3, Appendix 11.1 [APP-176] pages 58-60.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed response on this issue in **Q1.8.3 in**

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			The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083].
LIR-NCC-146	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.25 It should also provide current and representative baseline traffic data and assess the reasonable worst-case and cumulative effects on shared routes through villages. Enforceable construction traffic management controls should cover approved routes, vehicle numbers, delivery hours, contractor compliance, monthly monitoring data, investigation of breaches, community liaison, highway condition surveys and reinstatement of roads and verges.	The Applicant has provided representative baseline traffic data and assessed the reasonable worst case and cumulative effects through the assessment presented in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and supported by the **Transport Assessment [APP-174 to 177], Outline Construction Traffic Management Plan [REP1-068], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]** and **Outline O T MP [APP-202].** Together they set out the assessment methodology and the management and mitigation measures for the Scheme. The Applicant will continue dialogue with NCC regarding appropriate management controls. Proposed management and mitigation measures are detailed in section 7 of the **Outline CTMP [REP1-068]** this includes designated vehicle routes, delivery hours, highway condition surveys, monitoring and community engagement.
LIR-NCC-147	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.26 Detailed measures should be agreed with the County Council's public rights of way officer for every crossing or shared section, including safe management, banksmen, warning signs, temporary	The Applicant acknowledges the concerns raised regarding Public Rights of Way and notes the importance of ensuring that mitigation measures are clear, effective and deliverable. An **Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management

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		restrictions, diversions and route reinstatement.	of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme. The Applicant would welcome the opportunity for further engagement with NCC PRoW officers.
LIR-NCC-148	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.27 Noise and vibration at properties and listed buildings should be assessed and, where justified by project effects, mitigated. Pre- and post construction surveys would provide the evidence to determine whether any damage is caused to the fabric of historic buildings by traffic-related vibration and therefore whether remediation is required.	The Applicant refers to the response to LIR-NCC-143. The assessment of effects of 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 – APP-168]**. These documents note that environmental changes during the Construction Phase of the Scheme, particularly noise and vibration, are not expected to be any more than negligible. Construction vehicle routing has been developed in consultation with NCC as the Local Highway Authority, with the principal aim of avoiding sensitive heritage

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			assets and the routing of vehicles through local villages, wherever practicable, as set out in the **Outline CTMP [REP1-068]**. Mitigation measures to control noise and vibration during construction are set out within the **Outline CEMP [REP1-058]**. The Applicant therefore considers that pre-and post-construction surveys of Listed Buildings is not required, as these assessments have concluded that there will be no direct impacts upon designated heritage assets (e.g. through vibration) by the Scheme.
LIR-NCC-149	Transport and Access (Impacts – Requirements, Obligations and Other Measures)	8.28 The DCO should contain protective provisions for the benefit of the local highway authority. If there are no protective agreements, or a highways agreement in place before consent is granted, the powers in articles 8, 10 and 14 would represent an intolerable imposition of risk onto the County Council.	The Applicant will engage with the local highway authority regarding the inclusion of protective provisions for the benefit of the local highway authority in the **Draft DCO [REP1-014]**.
LIR-NCC-150	Hydrology, Land Drainage and Flood Risk (Summary)	9.1 The application is currently considered to be incomplete due to inconsistencies and limited information provided to support the application. The submitted Flood Risk Assessment (FRA) (ES Appendix 9.1: Flood Risk Assessment)19 is not adequate at this time. The application lacks information that demonstrates commitment to ensuring there is no increase in flood	Flood risk from all sources have been assessed within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**. All built infrastructure, temporary construction compounds and stockpiles will be located outside of Flood Zones 2 and 3, outside of major surface water

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		risk on site or elsewhere. In addition, there are a number of instances where the information provided is unclear and clarification is required to understand what is being proposed. 9.2 The County Council is continuing to work with the applicant's flood risk consultant to address the issues set out in our detailed response. However, Norfolk County Council considers that the applicant will need to gather more site specific information and further information will be required.	flow routes and as far as practicable, more localised areas of 'low' to 'high' surface risk. Limited areas of Solar PV Arrays are located within higher surface water flood risk areas due to operational reasons, however their design is such that they are raised up on narrow supports at an appropriate freeboard above external ground level/anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. As such, they will have a negligible impact on local surface water flood risk. The Applicant has applied the Sequential and Exception Tests to both site selection and for the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as possible. For the Exception Test, substantial wider sustainability benefits of the Scheme are summarised in the **Planning Statement [REP1-074],** together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding/operational for its lifetime and will not increase the risk of flooding elsewhere.
LIR-NCC-151	Hydrology, Land Drainage and Flood Risk	9.3 Norfolk County Council has reviewed the relevant ES chapters and supporting appendices. The County Council observes	See the Applicants response to LIR-NCC-150 to LIR-NCC-171.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Summary)	there are frequent inconsistencies in the information provided within the documents and chapters that leaves the County Council unclear about what is proposed to be built and how the associated flood risk will be mitigated.	
LIR-NCC-152	Hydrology, Land Drainage and Flood Risk (Summary)	9.4 The County Council notes that no substantive amendments in relation to flooding issues appear in the section 51 responses dated 28 April 2026 or 01 July 2026 from the applicant. This means the LLFA's previous comments20 in relation to Environmental Statement Chapters 1, 2, 3, 4, 9 and 9 remain unchanged along with those relating to the OLEMP, OCEMP, OEMP, ODEMP and the Design Principles, Parameters and Commitments.	Since the April and July submissions of **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, the Applicant has held meetings with the LLFA to discuss issues and is progressing a Statement of Common Ground with them. Following these meetings and to address requests for further information and inconsistencies between documents, the following documents have been updated at Deadline 1: • **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054];** • **Outline CEMP [REP1-058];** • **Outline OEMP [REP1-060];** • **Outline DEMP [REP1-062];** • **Outline LEMP [REP1-064];**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			• **Design Principles, Parameters and Commitments [REP1-078].**
LIR-NCC-153	Hydrology, Land Drainage and Flood Risk (Summary	9.5 While there are amendments to Appendix 9.1 - Flood Risk Assessment, on review of the updated FRA track changes (Rev 2, April 2026) report the LLFA notes the inclusion of Figure 9.8 in Appendix A which is the EA Historic Flood Mapping along with some textual editing on the cover sheet to Appendix A. No further changes in the FRA Rev 2 were observed. Therefore, all of the LLFA's comments relating to the FRA provided in April 2026 remain relevant.	The Applicant refers the County Council to the response for LIR-NCC-152. The LLFA's Relevant Representations have been responded to within **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authority's [PDA-008]** rows NCC-069 to NCC-192.
LIR-NCC-154	Hydrology, Land Drainage and Flood Risk (Policy Context)	9.6 The principal national policy is contained in EN-1 section 5.8. EN-1 paragraphs 5.8.6, 5.8.14 and 5.8.15 require flood risk from all sources to be considered. 9.7 Paragraphs 5.8.7, 5.8.11 and 5.8.12 require development to be safe for its lifetime without increasing flood risk elsewhere. The sequential approach is addressed in paragraphs 5.8.21 to 5.8.23, while surface-water management and sustainable drainage systems are	**ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** provides an assessment of flood risk from all sources in accordance with EN-1 paragraphs 5.8.6 and 5.8.15, and with consideration of climate change in accordance with EN-1 paragraph 5.8.14. The sequential approach has been applied to the Scheme as far as practicable, the use of surface water drainage measures are proposed for impermeable areas and built infrastructure has been designed to remain safe/operational for its lifetime through location

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		addressed in paragraphs 5.8.24 to 5.8.39, particularly paragraph 5.8.36.	within areas of lowest flood risk as far as reasonably practicable and incorporation of appropriate freeboards for Solar PV Arrays above external ground level/anticipated flood depths, in accordance with EN-1 paragraphs 5.8.7, 5.8.11, 5.8.12 and 5.8.36. Embedded flood risk mitigation is set out and secured within the **Design Principles, Parameters and Commitments [REP1-078]**, the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**.
LIR-NCC-155	Hydrology, Land Drainage and Flood Risk (Policy Context)	9.8 Paragraph 5.8.37 makes clear that approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the SoS. The SoS will therefore need to be satisfied that the proposed drainage system complies with any national standards published by Ministers under paragraph 5(1) of schedule 3 to the Flood and Water Management Act 2010.	The Applicant notes this comment.
LIR-NCC-156	Hydrology, Land Drainage and Flood Risk (Policy Context)	9.9 Solar-specific drainage and watercourse policies are contained in EN-3 paragraphs 2.10.76 to 2.10.80 and 2.10.146 to 2.10.149.	**ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** provides outline surface water drainage arrangements for the impermeable areas of the Scheme in accordance with EN-3 paragraphs 2.10.76-2.10.77 and 2.10.46-2.10.49.

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			Construction compounds will incorporate appropriate surface water management arrangements as secured within the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**. Works will be located at a minimum offset of 10metres away from the tops of banks of watercourses and Avoidance Areas have been identified for trenchless crossings to reduce impact on main river watercourses/fluvial floodplain, with preference given to open features over closed culverts for above ground watercourse crossings in accordance with EN-3 paragraphs 2.10.78-2.10.80.
LIR-NCC-157	Hydrology, Land Drainage and Flood Risk (Policy Context)	9.10 If a flood risk management authority (such as the LLFA) maintains an objection, EN-1 paragraph 5.8.40 requires the Secretary of State to be satisfied that all reasonable steps have been taken by the applicant and the authority to resolve the concerns.	The Applicant notes this comment.
LIR-NCC-158	Hydrology, Land Drainage and Flood Risk (Impacts)	9.11 The County Council's detailed LLFA comments21 identify extensive concerns across the ES, FRA, drainage strategy, control documents, design principles and plans. In short, the submitted Flood Risk Assessment (FRA) is not adequate. The application lacks information that demonstrates commitment to ensuring there is no increase in flood risk on site or	The Applicant refers the County Council to the response for LIR-NCC-151.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		elsewhere. In addition, NCC advised that there are a number of instances where the information provided is unclear and clarification is required to understand what is being proposed.	
LIR-NCC-159	Hydrology, Land Drainage and Flood Risk (Impacts)	9.12 The information in the FRA and the ES is not adequately supported with appropriate technical information, the proposed design does not contain enough information for a drainage strategy to be suitable and the information in the FRA and ES has many inconsistencies, contradictions and gaps. 9.13 There are inconsistencies and contradictions between both the FRA and the various relevant chapters in the ES. All this can be resolved but at the moment both the FRA and the relevant ES chapters need further work to be undertaken including some more consideration of the proposed development design and site-specific data.	The Applicant refers the County Council to the responses for LIR-NCC-151 and LIR-NCC-152.
LIR-NCC-160	Hydrology, Land Drainage and Flood Risk (Impacts)	9.14 Key points would include the lack of design detail relating to the impermeability of the proposed development platforms, access tracks and construction compounds.	The impermeable areas of the Scheme have been assessed and considered within the outlines surface water drainage strategy within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]. Construction compounds will incorporate appropriate surface water management arrangements as secured within the **Outline CEMP [REP1-058]** Tables 3.4 and 4.4, and **Outline DEMP [REP1-062]** Tables 4.4 and 5.4.
LIR-NCC-161	Hydrology, Land Drainage and Flood Risk (Impacts)	9.15 The information supporting the FRA and the drainage is incomplete. At the moment there is no preliminary site-specific infiltration testing in areas of interest.	Targeted ground investigations including infiltration testing will be undertaken at selective locations across the Order Limits during the Examination Period. The Applicant is in dialogue with the LLFA in respect of this matter.
LIR-NCC-162	Hydrology, Land Drainage and Flood Risk (Impacts)	9.16 The drainage strategy is not able to confirm where the surface water drainage would discharge to and is unable evidence whether this would be to the ground or whether discharge to a watercourse is viable.	**ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** has been updated at Deadline 1 to provide InfoDrainage modelling of the Project Substations within Sub-Sites 4B, 5A, 7F and 10C, and for swales along a length of access track within Sub-Site 4B. Conceptual surface water drainage drawings have been provided for the remainder of the access tracks with indicative ditch outfall locations within the wider Scheme.
LIR-NCC-163	Hydrology, Land Drainage and Flood Risk (Impacts)	9.17 There are inconsistencies and gaps in the ES assessment method for considering flood risk from surface water and ordinary watercourses.	Surface water flood risk has been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** using the Environment Agency's Risk of Flooding from Surface Water mapping.

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			The Scheme has been designed so that built infrastructure avoids major surface water flow routes and are located outside of 'low' to 'high' surface water flood risk as far as reasonably practicable. Limited areas of Solar PV Arrays are located within higher surface water flood risk areas due to operational reasons, however their design is such that they are raised up on narrow supports at an appropriate freeboard above external ground level/anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. As such, they will have a negligible impact on local surface water flood risk.
LIR-NCC-164	Hydrology, Land Drainage and Flood Risk (Impacts)	9.18 The County Council is particularly concerned that surface water flood risk is not treated equally with fluvial flood risk. EN-1 and national planning policy require all sources of flooding to be considered. The Environment Agency surface water mapping is relevant to ordinary watercourses and flow paths and should be considered alongside the flood map for rivers and the sea.	The Applicant directs the County Council to the response to LIR-NCC-163. The Applicant has applied the Sequential and Exception Tests to both site selection and for the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as possible. For the Exception Test, substantial wider sustainability benefits of the Scheme are summarised in the **Planning Statement [REP1-074]**, together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
LIR-NCC-165	Hydrology, Land Drainage and Flood Risk (Impacts)	9.19 The application contains repeated uncertainty about whether tracks, haul roads, compounds, laydown areas, substations, BESS platforms, access improvements, drainage features and grid infrastructure are temporary or permanent. The County Council considers many of these features to create impermeable or functionally impermeable surfaces and therefore require clear surface water management, attenuation, viable discharge locations and maintenance commitments.	Upon completion of construction, the temporary construction compounds and laydown areas, and temporary internal haul routes will be removed. As described in **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** when the operation and maintenance phase ends, the Sites would be decommissioned and the land returned to the landowner (the National Grid Substation and the Grid Connection Infrastructure would remain in situ). All infrastructure, including Solar PV Panels, Mounting Structures, above ground cabling, Conversion Units / 33 kV sub-distribution Switch Rooms, Project Substations and BESS would be removed from within the Sites. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface. The National Grid Substation and the Grid Connection Infrastructure would remain in situ. Pollution management and compound surface water management measures are st out in the **Outline DEMP [REP1-062]** Tables 4.4 and 5.4. For the purposes of the outline surface water drainage assessment within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, regardless of permanence of the infrastructure, the surface water attenuation for the impermeable areas for the Scheme have been assessed using the +45%

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			Upper End allowance for the 1 in 100 (1.0%) annual probability event as a worst-case scenario. The impermeable surfaces of the Scheme have been assessed within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**. Discharge locations of the BESS, National Grid Substation, Project Substations and access tracks are identified on the drawings in Appendix D of this report. An allowance for the standalone inverter/converter units has been included in the InfoDrainage modelling for the swale lengths in Sub-Site 4B. Outline maintenance activities for the proposed surface water drainage features are provided within Appendix A of the **Outline CEMP [REP1-058].** Detailed design and maintenance of the proposed surface the drainage systems are secured through DCO Requirement 11. Construction compounds/laydown areas and any access improvements will have appropriate surface water management as set out and secured within the **Outline CEMP [REP1-058]**.
LIR-NCC-166	Hydrology, Land Drainage and Flood Risk (Impacts)	9.20 The County Council also requires clarification regarding the management of fire suppression water, foul water from substations, potential impacts on groundwater recharge, maintenance	Clarifications on the matters raised by the County Council in LIR paragraph 9.20 have been provided by the Applicant within **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authority's [PDA-008]**.

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		during construction and decommissioning phases, watercourse crossings, ordinary watercourse consents, HDD breakout risks, and the consistency of the Works Plans with the ES and Design Principles, Parameters and Commitments document.	Foul water from welfare facilities for all phases of the Scheme will be collected within sealed systems and tankered off-site as set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060] and Outline DEMP [REP1-062]**.
LIR-NCC-167	Hydrology, Land Drainage and Flood Risk (Requirements, Obligations and Other Measures)	9.21 The Applicant should provide a complete and consistent scheme description identifying all temporary and permanent works relevant to flood risk and drainage. Surface water flood risk should be treated as a source of flooding equal in importance to fluvial flood risk, including in the sequential test and constraints assessment.	See the Applicant's response to LIR-NCC-165 regarding temporary and permanent works. The Applicant has applied the Sequential and Exception Tests to both site selection and for the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as possible. For the Exception Test, substantial wider sustainability benefits of the Scheme are summarised in the **Planning Statement [REP1-074]**, together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.
LIR-NCC-168	Hydrology, Land Drainage and Flood Risk (Requirements, Obligations and Other Measures)	9.22 Site-specific drainage strategies should be provided for substations, the BESS, access tracks, haul roads, compounds, laydown areas and other impermeable or functionally impermeable features.	The Applicant refers the County Council to the response for LIR-NCC-107.

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LIR-NCC-169	Hydrology, Land Drainage and Flood Risk (Requirements, Obligations and Other Measures)	9.23 Infiltration testing and site-specific ground investigation should be undertaken where infiltration is either relied upon or dismissed, and viable discharge locations, attenuation volumes, treatment trains and maintenance responsibilities should be identified for each drainage catchment.	The Applicant refers the County Council to the responses for LIR-NCC-161 and LIR-NCC-162. A Preliminary Surface Water Maintenance Plan is appended to the **Outline CEMP [REP1-058]** which contains outline maintenance activities for the anticipated drainage features for the Scheme.
LIR-NCC-170	Hydrology, Land Drainage and Flood Risk (Impacts)	9.24 The Applicant should clarify whether the National Grid substation, grid connection infrastructure, access tracks, culverts and other features would remain after decommissioning and should design retained features as permanent infrastructure.	See the Applicant's response to LIR-NCC-165 regarding temporary and permanent works. The National Grid Substation and connecting access track from Station Road will remain post-decommissioning of the wider Scheme. The surface water drainage systems for these elements have been designed using a +45% allowance for climate change allowance for peak rainfall intensity. In accordance with the **Design Principles, Parameters and Commitments [REP1-078]**, it is intended to prioritise open span structures and avoid culverts as far as possible. and should the use of culverts be required, they will be designed to accommodate flows with appropriate consideration of climate change,
LIR-NCC-171		9.25 A construction surface water drainage strategy, or equivalent control document, should be secured through the DCO.	As secured within the **Outline CEMP [REP1-058]**, a detailed surface water drainage strategy will be prepared prior to construction of the Scheme, with drainage requirements associated with the

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		The indicative masterplan should be augmented with plans which can be interpreted without ambiguity and show relevant environmental constraints, flood extents and watercourses.	construction phase included in the detailed CEMP. Temporary drainage systems will be developed to prevent runoff contaminated with fine particulates from entering surface water drains without treatment.
LIR-NCC-172	Socio-economics, employment and skills (Summary)	10.1 The County Council notes that the Applicant has prepared an outline Employment, Skills and Supply Chain Strategy (oESSCS) and that a detailed Skills Supply Chain and Employment Plan (SSCES) is proposed to be prepared before construction. The County Council will continue to work with the Applicant to develop this plan and secure local benefits.	The detailed Employment, Skills and Supply Chain Strategy (dESSCS) to be prepared as per Requirement 19 of the **Draft DCO [REP1-014]** and will be informed by continuous engagement with relevant stakeholders. The Applicant welcomes the opportunity to continue working with the NCC to develop it. The timeline for development of the detailed ESSCS is set out in Table 7.1 of the **Outline ESSCS [REP1-070]**.
LIR-NCC-173	Socio-economics, employment and skills (Policy Context)	10.2 EN-1 paragraph 5.13.12 provides that the Secretary of State may include a requirement specifying local-authority approval of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges, and training programmes. The broader assessment of employment, training and supply-chain effects is	The Applicant notes the points raised from the National Policy Statement and consider that the scope and content of the **Outline ESSCS [REP1-070]** complies with EN-1.

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		addressed in paragraphs 5.13.3 to 5.13.7, while paragraph 5.13.11 addresses positive provisions and legacy benefits.	
LIR-NCC-174	Socio-economics, employment and skills (Impacts)	10.3 The ES indicates that construction is anticipated to commence in 2028 and last approximately 24 months. The assessment identifies an average workforce and a peak workforce and estimates net direct jobs after displacement. The County Council considers that these potential economic benefits should be treated as benefits only to the extent that they are secured through clear, measurable and enforceable commitments.	The construction employment reported in **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** has been carried through into the **Outline ESSCS [REP1-070]**. The Applicant notes the request for clear, measurable, and enforceable commitments. This will be considered further in the development of the detailed ESSCS, which is secured through Requirement 19 of the **Draft DCO [REP1-014]**.
LIR-NCC-175	Socio-economics, employment and skills (Impacts)	10.4 The oESSCS is intended to promote competition, innovation and skills within communities surrounding the scheme, South Norfolk and the wider county of Norfolk. It describes the anticipated workforce profile, skills, equipment and services required to deliver the scheme and requires engagement with relevant stakeholders.	The Applicant refers to the response provided to LIR-NCC-173.
LIR-NCC-176	Socio-economics, employment and skills	10.6 A detailed Skills Supply Chain and Employment Plan is secured by DCO requirement 19. The plan should contain clear, measurable commitments to local employment, apprenticeships, skills	Norfolk County Council has been consulted in the preparation of the **Outline ESSCS [REP1-070]**, and it is our intention that it will continue to be consulted upon for the preparation of the detailed ESSCS. South

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	(Requirements, Obligations and Other Measures)	development, engagement with education providers and supply-chain opportunities. It should also provide for the County Council to be appropriately involved in the plan's development and discharge. 10.7 The County Council therefore requests that Norfolk County Council (or "the county planning authority") be named as a consultee for the approval of the SSCEP under requirement 19.	Norfolk Council will be required to approve the final ESSCS pursuant to Requirement 19 of the **Draft DCO [REP1-014]**. The ESSCS must be substantially in accordance with the outline version and must be implemented as approved.
LIR-NCC-177	Health and Wellbeing (Summary)	11.1 The County Council notes the Applicant's expanded human health assessment and the inclusion of a more detailed assessment of mental health and wellbeing within the Equality Impact Assessment. However, the County Council considers that residual effects on local populations are likely to remain and should be addressed through clearer, more proactive mitigation and communication.	The Applicant acknowledges the concerns raised regarding the potential residual effects of the Scheme on the mental health and wellbeing of local residents. In response to matters raised during the Examination, the Applicant submitted a **Mental Health and Wellbeing Addendum [REP1-107]** at Deadline 1. The Addendum provides further detail on the assessment of mental health and wellbeing pathways, including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. It is intended to supplement, rather than replace, the assessments submitted with the Application. The Addendum supports the conclusions presented in the Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** and the **Equality Impact**

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
			Assessment [APP-214]. It concludes that, whilst some individuals may experience anxiety, concern or distress in relation to the Scheme, significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups. The Addendum also identifies the mitigation and communication measures relevant to these pathways, including continued community liaison, timely communication regarding construction and access changes, and monitoring and engagement with affected communities and groups. The mechanisms through which these measures are secured are addressed further in the Applicant's response to LIR-NCC-183
LIR-NCC-178	Health and Wellbeing (Policy Context)	11.2 EN-1 recognises that energy infrastructure may have direct and indirect effects on health and wellbeing: see paragraphs 4.4.1 to 4.4.3. Paragraph 4.4.4 requires the Environmental Statement to assess effects on people and identify measures to avoid, reduce or compensate for adverse health impacts. Paragraph 4.4.5 requires cumulative health impacts to be considered where appropriate, while paragraph 4.4.6 addresses mitigation of indirect impacts, including effects on	The Applicant acknowledges the County Council's comments. Consistent with paragraphs 4.4.1 to 4.4.6 of EN-1, the Environmental Statement assesses direct, indirect and cumulative effects on human health, identifies relevant mitigation, and considers potential effects on vulnerable groups and people with protected characteristics. The potential health and wellbeing effects of the Scheme have been assessed within the Human Health Summary Statement contained in **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054].**

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		vulnerable groups and people with protected characteristics.	Sections 18.6.78 to 18.6.91 set out the mitigation measures that will be implemented to manage potential effects on the human health during the construction, operation and decommissioning phases. The WHIASU Population Groups Checklist was used to identify potentially vulnerable and sensitive population groups, as set out in section 18.6.77. These measures include the **Outline Construction Environmental Management Plan [REP1-058], Outline Construction Traffic Management Plan [REP1-068], Outline Operational Environmental Management Plan [REP1-060], Outline Landscape and Ecology Management Plan [REP1-064], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203], Outline Soil Resource and Management Plan [APP-204], Outline Battery Safety Management Plan [REP1-066], Outline Decommissioning Environmental Management Plan [REP1-062], and the Design Principles, Parameters and Commitments Document [REP1-078]**. Together, these documents establish the environmental controls and mitigation measures that will apply throughout the lifetime of the Scheme. Taking these mitigation measures into account, the Human Health Summary Statement contained in **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** assesses the likely health effects of the Scheme across a range of health determinants,

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			including climate change, environmental pollution, landscape and visual effects, transport and severance, socio-economics, agricultural land, and electromagnetic fields. This assessment is presented in sections 18.6.92 to 18.6.230 of **ES Chapter 18 – Other Environmental Matters [APP-054]**. Cumulative effects are also considered in sections 18.6.232 to 18.6.249 of ES Chapter 18. The assessment also considered groups who may be more sensitive to the effects of the Scheme. The WHIASU Population Groups Checklist was used to identify vulnerable and sensitive population groups, which are listed in section 18.6.77. In addition, the potential for the Scheme to affect people with protected characteristics has been assessed within the **Equality Impact Assessment [APP-214].** Together, these assessments conclude that, with the proposed mitigation in place, significant adverse effects on health and wellbeing are not expected.
LIR-NCC-179	Health and Wellbeing (Impacts)	11.3 The Equality Impact Assessment22 recognises concern regarding long term potential mental health impacts, particularly for elderly and more vulnerable populations. Potential pathways include access to nature, visual amenity and attachment to place, concerns regarding fire risk and community safety, cumulative	The Applicant acknowledges the County Council's comments. The potential mental health and wellbeing pathways identified, including access to nature, visual amenity and attachment to place, perceived fire and community safety risks, cumulative development, and concerns relating to property and business interests, are considered in the **Equality Impact Assessment**

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		impacts of concurrent schemes, and concerns about housing and business values.	**[APP-214]** and the **Mental Health and Wellbeing Addendum [REP1-107].** These assessments also consider whether effects may be experienced differently by potentially vulnerable groups, including older people and individuals with existing health or wellbeing vulnerabilities. They recognise that some individuals may experience anxiety, concern or distress in response to perceived environmental change and uncertainty. However, taking account of the nature of the pathways, the population groups affected and the proposed mitigation and communication measures, significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups.
LIR-NCC-180	Health and Wellbeing (Impacts)	11.4 The County Council notes the Applicant's commitment to continued engagement and monitoring of community impacts during construction. However, the County Council considers that the proposed approach should be more proactive and outreach-based, rather than relying primarily on passive channels such as email, registration or phone lines.	Community Liaison Group (CLG) - While noting that the final terms of reference would be subject to the post-consent discharge of the **Draft DCO's [REP1-014]** Requirement 4, the Applicant envisages taking a similar approach to that of its Cottam Solar and West Burton Solar 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. In terms of membership, the Applicant would expect the CLG to include representatives drawn from the

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			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. • Co-opted representatives from construction contractors, where appropriate once construction works begin. The objectives of the group would be to:

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			• 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 corresponding mitigation, and other matters identified in the DCO; • Agree timescales for providing additional technical information where required;

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			• 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.
LIR-NCC-181	Health and Wellbeing (Impacts)	11.5 The County Council also notes predicted operational noise effects at of residential receptors during early morning periods before mitigation. Mitigation for affected receptors should be clearly defined and secured. The County Council further notes that changes to landscape character and visual amenity are identified as the principal pathway through which operational health effects may occur.	The Applicant notes the County Council's comments. The Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054].** identifies operational noise and changes to landscape character and visual amenity as relevant pathways through which health and wellbeing effects could occur. Operational noise effects have been assessed on a worst-case basis. Where the assessment identifies a need for mitigation at residential receptors, this is to be addressed through secured mitigation, including low-noise inverter models, acoustic enclosures, noise barriers and reorientation of plant (see section 4.8 of the **Outline OEMP [REP1-060] and Schedule 2 Paragraph 14 of the Draft Development Consent Order [REP1-014]**. Following mitigation, residual noise effects are assessed as minor adverse or negligible and not significant (see section 18.6.229). The assessment also recognises that landscape character and visual amenity can influence wellbeing through sense of place and connection to nature. However, landscape mitigation and planting are expected to reduce effects over time. The assessment

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			therefore concludes that, whilst landscape and visual change may affect wellbeing, the Scheme is not anticipated to result in significant adverse long-term effects on human health (see sections 18.6.111 to 18.6.124).
LIR-NCC-182	Health and Wellbeing (Impacts)	11.6 No public rights of way are proposed to require long-term closure, but temporary restrictions, sometimes lasting longer than one month, are proposed. These should only be implemented where strictly necessary, with suitable alternative routes and clear communication to affected users. Separately from closures, there is a risk that development can result in the degradation of amenity to public rights of way receptors through the introduction of built elements or inappropriate mitigation planting which creates a sense of enclosure in a previously open route. These concerns are being addressed through design and landscape engagement.	The Applicant acknowledges the concerns raised regarding Public Rights of Way and community wellbeing and notes the importance of ensuring that mitigation measures are clear, effective and deliverable. In relation to transport matters, the effects of the Scheme on Public Rights of Way have been assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**. An **Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme.

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			The Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** and **Equality Impact Assessment [APP-214]** recognise that changes in landscape character, visual amenity and users' experience of recreational routes may affect wellbeing, particularly through sense of place, access to nature and recreation. The assessments also recognise concerns relating to perceptions of enclosure and changes to the visual experience of routes wellbeing (see sections 18.6.11 of the Human Health Summary Statement and section 7.4.5 of the Equality Impact assessment. The Applicant's response to concerns regarding enclosed routes confirms that existing PRoWs would be retained within open corridors with a minimum 15 m buffer from Scheme infrastructure, supported by landscape planting and screening. The Equality Impact Assessment similarly states that all PRoWs would retain a minimum 15 m buffer to infrastructure, including fencing, although users may continue to experience views of security fencing in some locations. The Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]** recognise that the effects of the Scheme on Public Rights of Way (PRoW) users

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			extend beyond route availability and include impacts on recreation, visual amenity, perceived safety, connection to nature and wellbeing. The assessments acknowledge that maintaining the legal availability of a route is not the same as maintaining its existing character or recreational experience and therefore consider landscape, visual amenity, perceived safety and connection to nature alongside access and connectivity. In response to concerns regarding enclosed routes, the existing PRoWs would be retained within open corridors with a minimum 15 m buffer from Scheme infrastructure, supported by landscape planting and screening (see Table 8.2 - Operation phase: Changes in views and landscape character). The Human Health Summary Statement concludes that landscape and visual effects would generally reduce over time as mitigation planting establishes and matures. By Year 15, most landscape receptors, PRoW users and recreational receptors are predicted to experience slight, minor or negligible effects, with significant residual effects remaining only in a limited number of locations (see section 18.6.124).
LIR-NCC-183	Health and Wellbeing	11.7 Community-engagement mitigation should be amended to include proactive outreach to affected groups rather than	The **Green Infrastructure Strategy [REP1-013]** presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. The mitigation & enhancement measures are cognisant of the project

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
	(Requirements, Obligations and Other Measures)	relying only on passive communication channels. 11.8 Mitigation should be defined and secured for all residential receptors affected by operational noise exceedances. Landscape mitigation and management commitments should be sufficient to address health and wellbeing pathways associated with visual amenity, access to nature, sense of place and perceived environmental quality. Restrictions on public rights of way should be implemented only where strictly necessary, with suitable alternatives and clear communication provided.	design principles and best practice, and they respond to the local context and are embedded into the design for managing environmental effects. Areas for mitigation and enhancement on which the Environmental Impact Assessment relies are defined on the Indicative Masterplan as provided in **ES Volume 2, Figure 4.1 – Indicative Masterplan [REP1-025]** and secured by Work No 7 as defined in the **Design Principles, Parameters and Commitment Document [REP1-078].** The Applicant acknowledges the NCC's request for proactive outreach and confirms that engagement would not solely rely on affected individuals raising concerns through passive communication channels. This matter is addressed through secured commitments for ongoing community engagement and liaison during the construction phase of the Scheme. **Requirement 4 of Schedule 2 to the Draft Development Consent Order [REP1-014]** requires the establishment of a Community Liaison Group prior to commencement of development. The Group would provide an accessible mechanism for communicating Scheme information, raising Scheme-related concerns and receiving timely responses during construction, helping to reduce uncertainty and address issues as they arise. In addition, the **Equality Impact Assessment [APP-214]** recommends continued engagement and

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			monitoring throughout construction, including engagement with affected communities, community leaders, active travel groups, local businesses, schools and local attractions, supported by dedicated communication channels (see Table 8.2: Construction Phase, Mental Health related equality effects and Operational Phase: Changes and connectivity to Public Rights of Way and recreational access). It also identifies the need for communication measures tailored to affected users where access restrictions or disruption may occur (see Table 8.2: Construction Phase, Severance and Accessibility Impacts during Construction). With regard to noise, the Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** details that operational noise effects have been assessed on a worst-case basis and, where necessary, are to be addressed through secured mitigation, including low-noise inverter models, acoustic enclosures, noise barriers and reorientation of plant (see section 4.8 of the **Outline Operational Environmental Management Plan [REP1-060]** and **Schedule 2 Paragraph 14 of the Draft Development Consent Order [REP1-014]** Following mitigation, residual noise effects are assessed as minor adverse or negligible and not significant (see section 18.6.229).

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			The Applicant also considers that landscape, visual and access-related wellbeing pathways have been appropriately assessed and mitigated as detailed in the Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054].** Landscape mitigation, habitat enhancement and long-term management are expected to reduce effects over time, with most communities, PRoW users and recreational receptors predicted to experience minor or negligible effects by Year 15. Accordingly, the Scheme is not anticipated to result in significant adverse long-term effects on human health (see section 18.6.124). No long-term PRoW closures are proposed. Any temporary restrictions would be managed through diversions, alternative routes, signage and advance notification in accordance with the **Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]**. The assessment concludes that accessibility, recreation opportunities and perceptions of safety would be maintained at levels that would not materially affect physical or mental wellbeing.
LIR-NCC-184	Minerals and Waste (Summary)	12.1 The County Council is the minerals and waste planning authority for Norfolk. The County Council considers that the ES has appropriately assessed the potential for the scheme to sterilise safeguarded mineral resources, and that embedded	**Ground Conditions (Minerals)** The Applicant notes this comment. Matters will continue to be recorded as part of the SoCG process. **Waste**

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		mitigation and post-consent work should enable the scheme to avoid needless sterilisation. However, the County Council does not accept the assumption that new non-hazardous landfill capacity would necessarily be approved in Norfolk if existing capacity were exhausted.	The Applicant notes this comment and refers to its response to 'NCC-064' in **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authority's [PDA-008]**. This confirms that the assessment of future non-hazardous void capacity in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** considers future capacity across the entirety of the East of England, not just Norfolk, and has taken a precautionary approach to determining the future sensitivity of this receptor: 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. The Applicant will continue to discuss this matter through the SoCG process to ensure the Applicant's and the Council's interpretations of the assessment align.
LIR-NCC-185	Minerals and Waste (Policy Context)	12.2 EN-1 paragraph 5.11.19 requires applicants to safeguard mineral resources on the proposed site as far as possible, taking account of the long-term potential of the land following decommissioning. Paragraph 5.11.28 requires appropriate mitigation where development affects a Mineral Safeguarding Area. EN-1 paragraphs 5.15.1 to 5.15.3 set out the waste hierarchy, while paragraphs 5.15.6	**<u>Ground Conditions (Minerals)</u>** Safeguarding of mineral resources and infrastructure has been assessed within **ES Volume 3, Appendix 16.2 – Minerals Resource Assessment Desk Study [APP-187]** and the **Outline Construction Environmental Management Plan [REP1-058]**. **<u>Waste</u>** The Applicant confirms that the assessment of waste and materials effects in **ES Volume 1, Chapter 18 -**

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		to 5.15.9 address circular economy objectives, sustainable waste management, reuse and recycling, and the effect of development waste on local waste management capacity. 12.3 The Norfolk Minerals and Waste Local Plan also safeguards mineral resources and mineral infrastructure, and requires appropriate assessment where development is proposed within mineral safeguarding areas.	**Other Environmental Matters [APP-054]** has been undertaken in accordance with NPS EN-1 Section 5.15 (and therefore with paragraphs 5.15.1-3 and 5.15.6-9).
LIR-NCC-186	Minerals and Waste (Impacts)	12.4 The Mineral Resource Assessment identifies mineral resources within the sub-sites and cable route corridors and estimates the potential resource within each area. Mineral resources beneath panel areas would be sterilised for the duration of the scheme, but this sterilisation is temporary and would cease following decommissioning. The BESS, National Grid substation and point of connection are not underlain by safeguarded mineral resources.	The Applicant notes this comment. Matters will continue to be recorded as part of the SoCG process.
LIR-NCC-187	Minerals and Waste (Impacts)	12.5 The County Council considers that mineral resource safeguarding has been correctly addressed. There would be limited impact from sterilisation and removal of material along parts of the	The Applicant notes this comment. Matters will continue to be recorded as part of the SoCG process.

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		cable route corridors. Ground investigations can take place post-consent and feed into the construction environmental management process regarding the potential reuse of materials arising during construction.	
LIR-NCC-188	Minerals and Waste (Impacts)	12.6 In relation to waste and materials, the County Council welcomes the inclusion of information on landfill capacity in Norfolk and the commitment to prioritise waste prevention, reuse, recycling and recovery in accordance with the waste hierarchy. However, the County Council disagrees with any assumption that new non-hazardous landfill capacity would necessarily be approved in Norfolk if capacity reached zero. Norfolk's geology makes much of the county unsuitable for hazardous or non-hazardous landfill.	The Applicant notes this comment and refers to its response to 'NCC-064' in **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authority's [PDA-008]**. This confirms that the assessment of future non-hazardous void capacity in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** considers future capacity across the entirety of the East of England, not just Norfolk, and has taken a precautionary approach to determining the future sensitivity of this receptor: 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. The Applicant will continue to discuss this matter through the SoCG process to ensure the Applicant's and the Council's interpretations of the assessment align as far as is practicable.
LIR-NCC-189	Minerals and Waste	12.7 Appropriate ground investigations and material-reuse measures should be secured through the CEMP, SWMP, soils management plan or equivalent control	The Applicant notes this comment and refers to its response to 'NCC-064' in **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authority's [PDA-008]**. This

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	(Requirements, Obligations and Other Measures)	documents. The waste assessment should be amended so that it does not assume that new landfill capacity would necessarily be approved in Norfolk. The waste hierarchy should also be embedded in the construction and decommissioning control documents.	confirms that the assessment of future non-hazardous void capacity in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** considers future capacity across the entirety of the East of England, not just Norfolk, and has taken a precautionary approach to determining the future availability of non-hazardous landfill void capacity. The Outline CEMP and Outline DEMP secure that the principles of the waste hierarchy will be applied. This will include, where reasonably practicable, segregation of construction materials for appropriate re-use, recycling and recovery with landfill as a last resort.
LIR-NCC-190	Fire and Rescue (Summary)	13.1 The County Council is the fire and rescue authority for Norfolk and oversees the operation of Norfolk Fire and Rescue Service (NFRS). The County Council expects compliance with the National Fire Chiefs Council (NFCC) guidance for grid-scale energy storage systems and relevant parts of NFPA 85524 in relation to battery safety management and suitable control measures.	The Applicant's **Outline BSMP [REP1-066]** is fully compliant with the NFCC's Grid-Scale Battery Energy Storage System planning – Guidance for FRS (2026) documentation and NFPA 855 (2026): Standard for the Installation of Stationary Energy Storage Systems. Additional safety standards and guidance used to draft the **Outline BSMP [REP1-066]** are also referenced in Section 1.5.3.
LIR-NCC-191	Fire and Rescue (Impacts)	13.2 The BESS and associated electrical infrastructure create fire safety considerations which require robust design, operational control, emergency response planning and engagement with Norfolk Fire and Rescue Service. The	Section 4.2 of the Applicant's **Outline BSMP [REP1-066]** confirms that two separate access points to the BESS site will be provided for Norfolk Fire and Rescue Service (NFRS) vehicles to ensure that firefighters do

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		County Council also notes that two directions of access are accepted in principle, but detailed access and firefighting arrangements will need to be reviewed as the scheme design develops.	not have to drive through a smoke or gas plume to access the BESS Compound. Section 4 of the **Outline BSMP [REP1-066]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant will agree final NFRS site access details and firefighting requirements at the detailed design stage. NFRS are a Statutory Consultee for the Scheme and must approve the final BESS site design before construction of the BESS begins. The **Outline BSMP [REP1-066]** is secured through a requirement in Schedule 2 of the **Draft DCO** [**REP1-014**]. This stipulates that a detailed BSMP is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with the **Outline BSMP [REP1-066]**.
LIR-NCC-192	Fire and Rescue (Requirements, Obligations and Other Measures)	13.3 The Applicant should demonstrate compliance with National Fire Chiefs Council guidance for grid-scale energy storage systems and the relevant parts of NFPA 855 and should prepare and secure a robust battery safety management plan.	The Applicant's **Outline BSMP [REP1-066]** is fully compliant with the NFCC's Grid-Scale Battery Energy Storage System planning – Guidance for FRS (2026) documentation and NFPA 855 (2026): Standard for the Installation of Stationary Energy Storage Systems.

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		It should engage with Norfolk Fire and Rescue Service on access, water supply, emergency response, isolation, containment and firefighting water management. Fire safety and fire water management should also be integrated with the flood risk and drainage proposals. 13.4 NFRS additionally expects compliance with the following requirements which should be reflected in the Design Principles Parameters and Commitments document25 and the outline Battery Safety Management Plan.	As confirmed in Section 4.1.7 of the **Outline BSMP [REP1-066]**: *"The Applicant has consulted NFCC guidelines and engaged with NFRS during the pre-application stage and will ensure that the detailed BSMP will include any subsequent revisions made to NFCC guidelines. Close consultation will continue with NFRS throughout the planning process."* The **Outline BSMP [REP1-066]** fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 4.5 of the **Outline BSMP [REP1-066]** documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the **Outline BSMP [REP1-066]** is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident.

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			The Environment Agency (EA) is a statutory consultee for the Outline BSMP, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A **Draft Statement of Common Ground [REP1-087]** (SoCG) between the Applicant and the EA was submitted at Deadline 1. As secured in Section 5.1.8 of the **Outline BSMP [REP1-066]**, the detailed design stage will determine the approach to addressing the following specific requirements, which will be updated prior to construction of the BESS and submitted to the relevant planning authority for approval prior to the commencement of construction of the BESS. The final BSMP must include: • The detailed design, including drawings of the BESS; • A statement on the battery system specifications, including fire detection and suppression systems; • A statement on operational procedures and training requirements, including emergency operations; • A statement on the overall compliance of the system with applicable legislation;

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			• An environmental risk assessment to ensure that the potential for indirect risks (e.g., through leakage or other emissions) is understood and mitigated; and • ERPs covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation NFRS, the Environment Agency (EA), and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community. The **Outline BSMP [REP1-066]** is secured through a requirement in **Schedule 2 of the Draft DCO [REP1-014]**. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The detailed BMSP will be substantially in accordance with the **Outline BSMP [REP1-066]**.
LIR-NCC-193	Fire and Rescue	13.5 To ensure any blast is directed upwards away from adjacent enclosures or personnel. Enclosure exhaust systems should be designed to maintain the internal	The Applicant's site design specifications and documentation is compliant with the listed

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	(Requirements, Obligations and other Measures)	environment below an average 25% of the lower flammability limit. All BESS sites should be designed to be open air with discrete purpose designed non-combustible modular container style enclosures. These should be accessed from the outside for maintenance and servicing. The maximum enclosure size must not exceed 16.2m long, 2.6m wide, 2.9m high, as per NFPA 855. Enclosures must not contain any HVAC or other equipment that is not directly connected to battery management, monitoring or fire/explosion suppression.	requirements. A summary of requirements is listed below: **Blast Risk:** Section 3.1.27 of the **Outline BSMP [REP1-066]** stipulates: "*BESS enclosure gas exhaust vents and deflagration panels must direct flaming or toxic gases away from site personnel or first responders in line with NFCC guidance, NFPA 68, and BS EN 14797 standards*." **Gas Exhaust system requirements:** Section 3.1.31 of the oBSMP confirms that: "*As a minimum, a BESS Combustible Concentration Reduction (CCR) system will comply with NFPA 855 (2026) / NFPA 69 guidelines which require activation at no more than 10% of the Lower Explosive Limit (LEL) of the explosive gas(es). The CCR must ensure the prevention of a dangerous build-up of explosive gases (on average 25% LEL within the BESS). The CCR system shall be suitable for its intended use and the temperatures to which it will be exposed to during a thermal runaway event. The CCR is considered a critical safety system and must comply with Section 4.10 of NFPA 855 concerning Emergency Power Supply Systems (EPSS) which requires emergency back-up power and system redundancy*." **BESS enclosure design**

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			Section 4.5.1 of the **Outline BSMP [REP1-066]** confirms the BESS design will not have personnel access into the enclosures. The **Outline BSMP [REP1-066]** stipulates that any HVAC system will only regulate temperature and humidity within the BESS enclosure. Section 3.1.31 stipulates: *"Heating and cooling of the battery modules will be provided by an independent liquid cooling system which will be separate to any HVAC system providing climate control for the BESS enclosure*." The Applicant confirms that any installed HVAC system must be fully compliant with NFPA 855 requirements and not inhibit CCR system (explosion prevention) or fire suppression system performance.
LIR-NCC-194	Fire and Rescue (Requirements, Obligations and other Measures)	13.6 Purpose designed BESS enclosure spacing should be no less than 0.914 metres between blank faces (no access openings). Large Scale Fire Testing must provide evidence that there is no propagation of fire, between enclosures, at this distance. Should test evidence support lesser distances then this may be considered on review of the evidence. If BESS enclosures are not purpose designed or evidence as above is not available, then spacing should be no less	Section 3.1.22 of the Applicant's **Outline BSMP [REP1-066]** confirms that both the illustrative site design and final site design spacing for the Scheme is compliant with this requirement. The illustrative BESS layout conforms to NFPA 855 (2026) standard allowing a separation distance of 2.5m between BESS blocks and 3.8m to ESS equipment (transformers, switchgear, etc.), and 2.5m between adjacent and back-to-back BESS enclosures. This conforms to NFPA 855 (2026) equipment spacing recommendations (if UL 9540A testing shows propagation does not occur), and also in compliance

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		than 3 metres on all faces, minimum requirements of NFPA 855 (current edition), whichever is the greater. Ancillary equipment, such as transformers or switchgear, should be situated at a safe distance to prevent fire propagation to, or from, any BESS enclosure. This should be evidenced by fire and explosion testing data for the relevant equipment, or a minimum of 3 metres from any BESS enclosure.	with equipment spacing integration which exceeds the minimum equipment spacing distances from the illustrative BESS (5 MWh design) validated through Large Scale Fire Testing (LSFT) in 2025. The BESS system selected at detailed design will have undertaken LSFT and utilised rigorous site specific consequence modelling reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS. LSFT of the selected BESS design to establish minimum equipment spacing distances and site specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with NFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third-party test and site-specific consequence modelling data which has been provided.
LIR-NCC-195	Fire and Rescue (Requirements, Obligations and other Measures)	13.7 BESS enclosures must not be stacked vertically due to the increased level of risk of vertical spread of fire and difficulty of access for firefighting.	The Applicant confirms that the Scheme will not integrate a BESS enclosure design that is vertically stacked.

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LIR-NCC-196	Fire and Rescue (Requirements, Obligations and other Measures)	13.8 Access routes between BESS enclosures should be a minimum of 3 metres. All site buildings, structures, storage or exposure hazards not connected with electrical grid infrastructure shall be no less than 3 metres from BESS enclosures. There should be 3 metre clearance between BESS enclosures and the outer perimeter of the compound, this should be kept clear of any combustible vegetation or any other fire risk to prevent the risk of fire spread. In rural locations, where vegetation may promote fires in the open, additional clearance distances may be required to reduce the risk of fire spread to BESS enclosures or increase of ambient temperature beyond safe operating conditions.	Section 3.1.22 of the **oBSMP [REP1-066]** confirms that: "*Areas within 10m of BESS enclosures do not contain combustible vegetation and would not be planted with any new combustible vegetation wherever possible. Where this is not feasible, a full risk assessment would be conducted, and mitigation features applied if required by the NFRS. Any other vegetation on in close proximity to the BESS area would be kept in a condition such that they do not increase the risk of fire*." Additionally, Section 4.5.2 of the oBSMP stipulates: "*The selected BESS design will have undertaken LSFT to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate equipment spacing distances, and demonstrate that deflagrations do not occur and / or can be safely constrained. In accordance with NFCC guidance, the Order limits will be maintained to prevent a fire spreading to the BESS or inadvertently fire loading, by providing a 'bridge' or path between BESS enclosures to transmit flaming or radiant heat*." The Applicant notes the requirement for a minimum 3 metre spacing to access routes, structures, and the compound perimeter. The illustrative Compound design conforms to these parameters.

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			As outlined in several sections of the oBSMP, LSFT of the selected BESS design to establish safe minimum spacing distances and site-specific consequence modelling (fire and explosion risk) will provide a clear, evidence-based case for the final BESS Compound installation plans at the detailed design phase and will be agreed with NFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third-party test and site-specific consequence modelling data which has been provided.
LIR-NCC-197	Fire and Rescue (Requirements, Obligations and other Measures)	13.9 The minimum distance between any BESS enclosure and occupied buildings, outside the perimeter of the compound, must be no less than 30 metres. This may be reduced if blast walls are installed and evidenced to ensure equivalent safety levels.	As confirmed in Section 3.1.18 of the **oBSMP [REP1-066]**, the site layout will conform to NFPA 855 requirements in that no occupied building / structure will be located within 30.5m of any BESS enclosure. Any occupied building within 61m of a BESS enclosure fire would be automatically evacuated.
LIR-NCC-198	Fire and Rescue (Requirements, Obligations and other Measures)	13.10 All Battery Management Systems (BMS) should be configured to monitor potential failure conditions, such as abnormal cell and/or rack voltage, temperature and current, which could lead to thermal runaway. The BMS shall initiate safety actions on any potential failure conditions.	As stipulated in Section 3.3.3 of the **oBSMP [REP1-066]**, the BESS system selected at the detailed design stage must integrate the following minimum system requirements: "*Energy Management Systems (EMS) / BMS controls should as a minimum incorporate NFPA 855 (2026) monitoring and control features and conform to the IEEE 2686 (2025) standard: Recommended Practice fo*

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			Battery Management Systems in Stationary Energy Storage Applications." NFPA 855 (2026) minimum safety functions include: High cell temperature trip to isolate the module or rack when detecting cell temperatures that exceed limits; Thermal runaway trip to isolate the battery system whe a cell is detected to have entered a thermal runaway condition; Rack switch fail-to-trip to disconnect the rack if any failure is detected. Inverter / charger fail-to-trip to isolat the BESS enclosure at the breaker if the inverter / charger fails to respond to a trip command; and Inverter / charger fall-to-trip (supervisor level): This function initiates a trip command to an upstream breaker to isolate the ESS if the inverter / charger fails to respond to a trip command. The 'supervisor' level control system controls the entire system, including the combination of racks, the environmental support systems, and the charging / discharging status. The supervisor level should isolate the ESS if the inverter / charger fails to trip on an appropriate signal, or if communication is disrupted between the inverter / charger and the supervisor control. Furthermore, as confirmed in Section 3.3.4 of the oBSMP the Applicant has stipulated that:

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			"*If data analytics are not directly integrated by the BES Original Equipment Manufacturer (OEM) or BESS integrator, the Applicant will ensure a data analytics package is integrated to provide a greater range of performance and safety data i.e. predict ageing of the cells in battery systems, alert BMS faults or malfunctions, identify electrical abuse during operations, alert the operator when modules need maintenance or decommissioning. Data analytics facilitate more accurate assessment of operating temperature variations, voltage anomalies, State of Charge (SOC) and State of Health (SOH). Data analytics can also monitor complimentary BESS safety features i.e. smoke and gas sensors, BESS multi-sensor equipment, ground fault detectors, etc.*"
LIR-NCC-199	Fire and Rescue (Requirements, Obligations and other Measures)	13.11 All BESS enclosures shall have smoke, flammable gas and heat detection systems that comply with relevant design standards which shall be interfaced to the BMS to ensure suitable safety actions are triggered in the event of activation.	Section 3.1.30 of the **oBSMP [REP1-066]** stipulates: "*The fire and gas detection system for the BESS will comply with NFPA 855 (2026) and NFPA 69 standards. This means that smoke, fire and gas detection equipment will be installed on the BESS Site. BESS multi-sensor equipment which measures combinations of air temperature, hydrogen, volatile organic compounds, overpressure, shock and vibration, and moisture ingress will also be considered if fully tested with the specific BESS design. The gas detection systems should have external BESS beacon and audible alert facility and annunciate at an approved remote 24/7 control centre. All fire detection*

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			systems should be installed and commissioned to BS EN 54, BS EN 9999, NFPA 855 and NFPA 850. The final BESS failure detection design will be validated by an independent Fire Protection Engineer under the responsibility of the Operations, Engineering and Maintenance Contractor prior to construction, and will be approved by NFRS." As also stipulated in Section 3.1.30 of the oBSMP: "*If the BESS design does not integrate internal fire and gas detection equipment in alignment with NFPA standards and instead monitors failure parameters through a local Supervisory Control and Data Acquisition (SCADA) system, then fire and explosion mitigation protection systems must be validated through full scale destruction testing and deflagration modelling i.e. Tesla Megapack 2XL design. The final fire detection design (BESS enclosure and BESS Site) should be validated by an independent Fire Protection Engineer prior to construction and will be approved by NFRS*."
LIR-NCC-200	Fire and Rescue (Requirements, Obligations and other Measures)	13.12 If fitted, suppression systems must be appropriate to the battery technology contained within the enclosure and designed to ensure efficient operation. Generally, suppression systems will be intended to prevent fires in ancillary equipment spreading to battery modules and should be designed accordingly. They	The Applicant has defined key suppression system specifications and performance criteria required for the Scheme in Section 3 of the **oBSMP [REP1-066]**, namely: • BESS enclosure single use (noncontinuous operation) fire protection systems or systems without applicable codes and standards will be

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		must be interfaced to the BMS and any other safety monitoring systems to ensure suitable safety actions are triggered in the event of suppression system activation.	tested to UL 9540A installation level testing or through significant scale third party fire and explosion testing. The system design must be capable to control or fully suppress a fire, without the direct intervention of NFRS. Fire suppression system performance will be benchmarked against free burn testing. An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results plus any additional fire and explosion test data which has been provided and validate the suppression system design. • If a BESS automatic fire suppression system or TRPP system (engineered to directly access cells within battery modules) is integrated within each BESS enclosure, this will conform to NFPA 855 standards and be tested to UL 9540A installation level protocols or through significant scale third party fire and explosion testing. The suppression or TRPP system will be capable of operating effectively in conjunction with a gas exhaust / ventilation system to minimise deflagration risks. The system design must be capable to control or fully suppress a fire, without the direct intervention of NFRS. Fire suppression system performance should be benchmarked against free burn testing. An independent Fire Protection Engineer specialising in BESS will

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			review all UL 9540A test results plus any additional fire and explosion test data which has been provided and validate the suppression system design. System design and water supply requirements must be fully agreed with NFRS; • If a BESS enclosure design does not integrate automatic fire suppression systems and a dry pipe sprinkler or spray system is integrated, then NFCC (2026) guidance will be followed. Connections to any dry pipe systems that are required to be installed on the BESS Site should installed in accordance with BS 9990 Non-automatic firefighting systems in buildings code of practice (Current Edition) and should be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition). If a dry pipe system is integrated for the BESS, NFRS instantaneous connection points will be located at a safe distance from BESS enclosures and clearly signed for NFRS response, in accordance with NFCC guidelines. Water supply for this type of system will be separate from the water supply designated for NFRS boundary cooling requirements; • If the BESS enclosure is a walk-in design (this is a very low probability because most BESS designs are cabinet systems that can be fully

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			serviced without entering the enclosure), an automatic water fire suppression system must be installed. The suppression system must be capable to operate effectively in conjunction with a gas exhaust / ventilation system to minimise deflagration risks. System design and water supply requirements will be fully agreed with NFRS. NFPA 855 (2026) prohibits the use of clean agent or aerosol Fire Suppression Systems (FSS) within the BESS enclosures, unless a sprinkler or spray system is also integrated into a BESS enclosure. Clean agent and aerosol FSS cannot be the primary fire suppression method unless fire and explosion testing with the specific BESS design can demonstrate that use of such systems does not present a deflagration hazard. If an aerosol FSS is integrated into each BESS enclosure, then the system must be designed and certified to discharge specifically for an 'electrical fault' fire and shall not discharge in any thermal runaway scenario ensuring a gas exhaust system can remain in operation.
LIR-NCC-201	Fire and Rescue (Requirements, Obligations and other Measures)	13.13 The BMS, and other safety systems, must be able to raise the alarm to a continuously staffed monitoring station for immediate attention. It must place in a safe state and isolate, affected battery cells, racks or full enclosures from the electricity	As stipulated in Section 3.3.3 of the **oBSMP [REP1-066]**, the BESS system selected at the detailed design stage must integrate the following minimum system requirements: "*Energy Management Systems (EMS) / BMS controls should as a minimum incorporate NFPA 855 (2026)*

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		grid, or other power supply. This action must occur autonomously, but also be able to be remotely triggered, where any safety conditions are detected or identified by the BMS, or concern is raised at the monitoring station. There should also be visual and audible indicators linked to the BMS and addressable identification and control equipment on site to assist operational fire crews identify any enclosure which may be posing a risk and what the risk is.	*monitoring and control features and conform to the IEEE 2686 (2025) standard: Recommended Practice for Battery Management Systems in Stationary Energy Storage Applications*." The BESS will be monitored by a control facility within the BESS Compound, as well as 24/7 monitoring by a remote control facility provided by the BESS manufacturer or operator. Details and specifications of on-site addressable Firefighter Control Panels (FCP) will be provided once the BESS system is selected at the detailed design stage. The 24/7 remote control facility will monitor the security of the BESS Compound, monitoring and detection systems will be repurposed in an emergency to support first responders. NFPA 855 (2026) defines the minimum monitoring and control standards. The gas detection systems will have external BESS beacon and audible alert facility and annunciate at the approved remote 24/7 control centre and on-site FCPs. The 24/7 remote control facility will have the capability to immediately shut the system down should an incident occur, and the need arise. In some circumstances it will be necessary to discharge the batteries to enable the first / second responders to deal with the incident. This capability could potentially be achieved through the 24/7 remote

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			control facility. The precise methodology in this regard will be agreed in the ERP once the detailed design of the BESS is known. This will be prepared in conjunction with NFRS and is secured through the oBSMP.
LIR-NCC-202	Fire and Rescue (Requirements, Obligations and other Measures)	13.14 All safety systems, including the BMS, must be subject to routine testing in accordance with any industry guidance or manufacturers specification.	The Applicant notes this comment; this requirement is stipulated in Sections 3.3.10 and 3.3.11 of the **oBSMP [REP1-066]**.
LIR-NCC-203	Fire and Rescue (Requirements, Obligations and other Measures)	13.15 All BESS enclosures are required to have purpose designed and installed deflagration protection, or deflagration venting, as appropriate to the hazard and battery technology contained therein. This should be designed in accordance with British or NFPA Standards. Where venting is provided this should be mounted in the top panels of the enclosure to allow the safe release of any gas mixture to mitigate the risk of deflagration.	The Applicant confirms that as defined in Section 3 of the **oBSMP [REP1-066]**: • The BESS enclosure will be designed to withstand overpressures generated by the battery system during thermal runaway. As a minimum, an explosion prevention system to NFPA 69 standards will be integrated which should be complimented by an explosion protection system to NFPA 68 and BS EN 14797 standards. • If the BESS design integrates hybrid systems, sparker system, Active Ignition Mitigation System (AIMS), or performance design explosion, protection systems should be validated through BESS full-scale destruction testing, lean gas mixture testing and requisite

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			pressure testing required by NFPA and EN standards. Full-scale destruction testing validates all active and passive protection system integrated into a BESS enclosure. • Most LSFT test programs do not performance test BESS active protection systems. Therefore, any BESS explosion prevention or control / protection system will be validated through additional full scale BESS destruction testing, lean gas mixture testing and requisite pressure testing required by NFPA and EN standards. An independent Fire Protection Engineer specialising in BESS should review all UL 9540A test results and any additional fire and explosion test and modelling data which has been provided. Section 3.1.27 stipulates BESS enclosure gas exhaust vents must direct flaming or toxic gases away from site personnel or first responders in line with NFCC guidance.
LIR-NCC-204	Fire and Rescue (Requirements, Obligations and other Measures)	13.16 The site design should include safe access routes for fire appliances to manoeuvre within the site (including turning circles where necessary). An alternative approach route and access point, preferably opposite the main approach route and access point, should be provided where practicable to enable	Section 4.2 of the Applicant's **oBSMP [REP1-066]** confirms that two separate access points to the BESS site will be provided for Norfolk Fire and Rescue Service (NFRS) vehicles to ensure that firefighters do not have to drive through a smoke or gas plume to access the BESS Compound.

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		fire appliances to approach from an up-wind direction. 'Loop' access around the curtilage of the BESS compound will only be considered if it is not practicable to provide a suitable alternative approach route and access point. If a single access route into the compound is agreed then the route will generally be required to approach and enter from the South of the compound, to account for prevailing wind conditions, but this must be agreed with NFRS. The NFCC guidance document provides information on access routes and refers to Building Regulations Approved Document Volume 2 for further information.	A swept path analysis for emergency vehicles has been undertaken, and the roads have been confirmed as suitable for emergency vehicle access. The proposed access-route within the BESS Compound will be 4.5m with passing places integrated. There will be no dead-end access routes or extremes of grade. The Applicant will agree final NFRS site access details and firefighting requirements at the detailed design stage. NFRS are a Statutory Consultee for the Scheme and must approve the final BESS site design before construction of the BESS begins.
LIR-NCC-205	Fire and Rescue (Requirements, Obligations and other Measures)	13.17 The applicant should consult NFRS at the earliest opportunity to discuss response times to ensure that emergency plans are adequately developed. All site management procedures should be regularly reviewed and any changes to the emergency response plan communicated to NFRS as soon as possible. This consultation should include training and tours of the facility for NFRS operational staff on an ongoing basis, at an agreed	The Applicant will consult with NFRS to establish emergency response times during the early period of the detailed design stage. The Applicant through early NFRS engagement will establish and agree site familiarisation and training requirements (training schedules, required training drills, site familiarisation schedules, etc.) Section 5.1.8 of the **oBSMP [REP1-066]** confirms: "*ERPs covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in*

ID	Theme(s)	Norfolk County Council Comments	Applicant's Response
		schedule period, to ensure effective firefighting response is maintained.	*consultation NFRS, the Environment Agency (EA), and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community*." Also, as stipulated in Section 4.4.5 of the oBSMP: "*The Applicant, during design development, will work closely with NFRS to provide all relevant information on BESS and site design features to inform all necessary hazard and risk analysis studies and assist in the development of a comprehensive Risk Management Plan (RMP) and ERPs*." As specified in the oBSMP Section 5.1.2, the detailed BSMP (including ERPs) will be updated should the battery technology change during the operational replacement period. Existing control measures and mitigation will not be amended without prior agreement with NFRS. The Applicant must consult with NFRS and the Environment Agency before making any changes to any ERP.
LIR-NCC-206	Fire and Rescue	13.18 Sufficient water supply, for effective operational firefighting, is to be provided on BESS sites even where enclosure manufacturers indicate that a full burn out	The Applicant confirms that all requirements are satisfied, firefighting water requirements are stipulated in Section 4.3 of the **Outline BSMP [REP1-066]**, namely:

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	(Requirements, Obligations and other Measures)	strategy should be adopted. This will ensure adequate water for boundary cooling the vicinity of the affected enclosure to reduce the potential of fire spread to adjacent enclosures or beyond the BESS compound. A fire hydrant should be a minimum of 10 metres from BESS containers but be situated in close proximity to the compound. The water flow rate from any hydrant fed by a potable water main, or on-site pumped supply, should be a minimum of 25l/sec for at least 2 hours. If fire fighting water provision is to be achieved using static stored water on site then the storage should be no less than 180,000 litres. If necessary, due to the compound size, further hydrants should be strategically located across the compound. If stored water supplies are to be the only provision then advice and agreement on their location and access should be discussed with NFRS. All water supplies and infrastructure shall be tested and regularly serviced by the operator in accordance with BS9990 and all hydrant, outlets or hard suction points must be physically protected from mechanical damage.	• The BESS area will be designed to integrate firefighting to integrate pressure fed (pump driven) fire hydrants fed from water tanks. Hydrants will be located in consultation with NFRS to provide redundancy and safe operating distances for firefighters. They must be clearly marked with appropriate signage. They will be easily accessible to NFRS vehicles, and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with NFRS. Any outlets and hard suction points should be protected from mechanical damage (e.g. through use of bollards); • Water storage volumes will be fully agreed with NFRS. The BESS area will contain a minimum of two firefighting water storage tanks of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours; • The firefighting water requirement will be fully assessed at the detailed design stage based upon based upon analysis of LSFT of the BESS design, plus any additional fire and explosion test data provided by an independent Fire Protection Engineer; • Fire hydrants and connections to any dry pipe systems that are installed in the BESS area will

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			be in accordance with BS 9990 Non-automatic firefighting systems in buildings code of practice (Current Edition) and should be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition); and • If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures, a dedicated water supply from separate water tanks and separate containment arrangement will be provided. Runoff from internal suppression systems has the potential to contain elevated pollutant concentrations and will therefore be managed independently of the external surface water system. Backflow prevention measures, including check valves or equivalent devices, will be incorporated to prevent contamination of potable water supplies in accordance with relevant regulations. Pollution analysis will be conducted before removing and treating offsite.
LIR-NCC-207	Fire and Rescue (Requirements, Obligations and other Measures)	13.19 Specification of BESS enclosures detailing Ingress Protection (IP) rating should be provided to NFRS to ensure that any firefighting activities do not introduce further risk to adjacent containers. A minimum rating of IP55 is required for all enclosures.	The Applicant notes this comment; this commitment is confirmed in Sections 3.1.25 and 3.1.26 of the **Outline BSMP [REP1-066]**. Ingress protection testing of BESS enclosures will be conducted under UL9540 and/or IEC62933-5-2 certification of the BESS system.

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			IEC Factory Acceptance Testing (FAT) or an independent manufacturing audit will be carried out to ensure the supplied BESS enclosures comply with the requisite certified ingress protection levels.
LIR-NCC-208	Fire and Rescue (Requirements, Obligations and other Measures)	13.20 Fire water run off should be contained using drainage systems, interceptors and bunded tanks or lagoons, to ensure it can be tested and disposed of safely, without contaminating the ground on which the BESS compound is located. This should be considered and documented within the environmental risk assessment and plan in accordance with any guidance issued by the Environment Agency.	Section 4.4.1 of the **Outline BSMP [REP1-066]** confirms that: "*The BESS Site will have a robust and validated emergency response plan (ERP), developed in consultation with NFRS. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the site operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters*." Section 4.5 (4.5.5 – 4.5.9) of the oBSMP documents the firefighting water capture and drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the oBSMP is to contain and isolate

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			firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process.
LIR-NCC-209	Fire and Rescue (Requirements, Obligations and other Measures)	13.21 Site location plans, having a compass rose showing north and the prevailing wind condition, should identify sensitive receptors, which could be affected by a fire, within a 1km radius of the BESS compound. Please refer to the NFCC guidance which contains details of sensitive receptors. These plans should support discussion with planners and other stakeholders regarding site suitability and emergency planning. Assessment of potential risk should consider battery technology, expected fire and rescue response (as detailed in the fire strategy for the site) and proximity of transport infrastructure and public buildings. A gas plume model may also be used to	Section 4.2.4 of the **Outline BSMP [REP1-066]** confirms the detailed BSMP will include a plan that shows all sensitive receptors within a 1km radius of the BESS Compound that could be affected by a fire. The plan will have a compass rose showing north and the prevailing wind direction. As recommended in National Fire Chiefs Council (NFCC) guidelines (2026), the Applicant commissioned a Plume Analysis Study (BESS Fire Emissions Modelling) which is included as Appendix B to the **Outline BSMP [REP1-066]** . The assessment has been conducted using the concept design to assess the air quality impact of a BESS thermal runaway incident to sensitive human receptors within a 1km radius of the BESS area. Concentrations of carbon monoxide (CO),

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		evidence level of risk to nearby sensitive receptors.	formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be adverse effects at the closest residential receptor locations because of a BESS fire incident. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulate matter concentrations to determine the effect of BESS fire emissions on visibility to local transport links i.e. road network and railway. The predicted visibility distances are greater than safe stopping distances for roads and rail within a 1km radius of the BESS area. The listed NFRS / NFCC requirements for the detailed design stage are secured through the oBSMP in Sections 4.4.2 – 4.4.7 and a BESS design and site-specific Plume Analysis Study are secured in Section 4.5.13.

3 The Applicant's Responses to South Norfolk Council's Local Impact Report

Table 3.1 Applicant's responses to South Norfolk Council's Local Impact Report [REP1-213]

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
LIR-SNC-001	Introduction – Purpose of this Local Impact Report	1.2.1 This Local Impact Report (LIR) has been prepared by South Norfolk District Council in accordance with the Planning Act 2008, which requires local Authority to submit a written report detailing the likely impacts of a proposed Nationally Significant Infrastructure Project (NSIP) on their administrative area. The purpose of the LIR is to assist the Examining Authority by presenting an evidence-based assessment of the localised environmental, social and economic effects of the East Pye Solar Project as it relates specifically to South Norfolk. 1.2.2 The report provides an impartial evaluation of the development's anticipated benefits and harms, with particular reference to the adequacy of proposed mitigation measures and the extent to which the project aligns with relevant planning policy. While the	The Applicant welcomes the Local Impact Report (LIR) submitted by South Norfolk District Council (SNDC) as the host authority for the Scheme. The Applicant has provided detailed responses to each point raised within the LIR herein. A draft **Statement of Common Ground with SNDC** has been submitted at Deadline 1 **[REP1-086]** which reflects discussions between the Applicant and SNDC across the topics covered by the Local Impact Report. An updated Statement of Common Ground is being produced with SNDC, to be submitted at Deadline 3 in line with the timetable set out within the Rule 8 Letter [PD-007]. The SoCG, to be submitted at Deadline 3, will set out an update on discussions on each of the matters raised within the Local Impact Report.

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		Council recognises the national importance of renewable energy generation and associated electricity network infrastructure, it has a responsibility to ensure that the local implications of the scheme are fully and transparently understood.	
LIR-SNC-002	Introduction – Legislative and policy context	13.1 In preparing this LIR, the Council has had regard to the requirements of the Planning Act 2008 and followed the approach set out in the Department for Communities and Local Government's Guidance for the Examination of Applications for Development Consent (2015). In addition, the report has been informed by the Planning Inspectorate's Advice Note One: Local Impact Reports (2012). 1.3.2 The assessment reflects relevant national policy, including the National Planning Policy Framework (NPPF) (2026) and associated guidance and is grounded in the statutory development plan for South Norfolk, comprising the Greater Norwich Local Plan (2024) and the South Norfolk Local Plan Development Management Policies (2015). Where appropriate, reference is	The Applicant has considered the Scheme's compliance with national policy and the local relevant local policy, including the Greater Norwich Local Plan (2024), the South Norfolk Development Management Policies (2015) and relevant supplementary guidance, which is set out within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**.

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		also made to emerging supplementary planning documents and strategies. 1.3.3 In accordance with section 104 of the Planning Act 2008, the Secretary of State's decision on the Application will be taken principally in accordance with the relevant National Policy Statements (NPSs) unless one of the statutory exceptions applies. The Council therefore recognises that the primary policy framework for the determination of the Application is provided by NPS EN-1 (Overarching National Policy Statement for Energy) and NPS EN-3 (Renewable Energy Infrastructure), both of which establish the need for nationally significant energy infrastructure and provide the principal framework for the assessment of its impacts. The Council's assessment in this Local Impact Report has therefore been prepared having regard to those NPSs and is directed towards assisting the Examining Authority in understanding the nature, extent and significance of the local impacts arising within South Norfolk.	

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		1.3.4 While development plan policies do not determine the Application in the same manner as a Town and Country Planning Act decision, the Council considers that the Greater Norwich Local Plan (2024), the South Norfolk Development Management Policies (2015) and relevant supplementary guidance provide important locally specific evidence regarding landscape character, heritage significance, biodiversity, environmental quality, local distinctiveness and community impacts within South Norfolk. Reference is therefore made to those documents throughout this Report insofar as they assist in identifying, describing and evaluating the significance of local impacts arising from the Proposed Development.	
LIR-SNC-003	Introduction – Scope of the report	1.4.1 This LIR considers only those impacts expected to arise within the administrative area of South Norfolk District. The proposal site covers a significant area of the district consisting of 10 sites with cable route corridors connecting these over 2,700 acres. As such, the report focuses on environmental, heritage, landscape,	The Applicant notes the scope of the Local Impact Report and has provided detailed responses, or cross references to where previous responses have been provided, herein.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		ecological, amenity, socio-economic and cumulative effects as they relate to local communities, land uses, designated assets and the rural landscape. 1.4.2 The Council recognises that national need is established principally through the relevant NPSs. The LIR does not therefore assess the national need for the project or examine alternative strategic options, as these matters fall outside the remit of the local authority within the DCO process. Instead, the focus is on the extent and significance of local impacts and the adequacy of mitigation measures proposed by the applicant. 1.4.3 The remainder of this LIR is structured as follows: • Section 2 summarises the key local harms that should be considered throughout the Examination. • Section 3 summarises the proposed development and its specific components within South Norfolk.	

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		• Section 4 identifies other relevant NSIPs and major planning proposals in the district. • Section 5 outlines the applicable planning policy framework • Section 6 describes the local environmental, social and economic context. • Section 7 presents the topic-based assessment of impacts, covering heritage, landscape, ecology, noise and other relevant disciplines. • Section 8 sets out the Council's comments on the Draft Development Consent Order. • Section 9 summarises the principal issues for the Examination. provides the Council's overall conclusions. • Section 10 provides the Council's overall conclusions. • Section 11 lists supporting appendices.	

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LIR-SNC-004	Key Local Impacts - Heritage	2.1 The proposal involves sites containing solar panels, substations, and a BESS in a rural landscape containing numerous designated heritage assets, including listed buildings, scheduled monuments and conservation areas. The Council's Relevant Representation (Appendix D) includes detailed assessments of the harm to heritage assets across the sites, noting that the ES identifies only indirect minor adverse effects and generally negligible effects which equates to less than less than substantial harm. 2.2 The Council however disagrees with the level of harm assessed for two heritage assets, Grade II Moulton Farmhouse (1373270) and Grade II Hillside House (1050216). SNDC maintain that these should be assessed as experiencing a moderate degree of harm given the medium sensitivity of the assets and low magnitude of impact on their settings using the matrix in APP-046.	The Applicant agrees that **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** identifies only indirect minor adverse effects and generally negligible effects, which equates to less than substantial harm. The Applicant acknowledges the disagreement in level of harm with SNDC regarding the Grade II Moulton Farmhouse (NHLE 1373270) and Hill House (NHLE 1050216) and notes that detailed responses regarding both Designated Heritage Assets have been provided within the **Statement of Common Ground with South Norfolk District Council [REP1-086]** (SNDC CH-10 – SNC CH-11), as well as within **8.6 The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authority's [PDA-008]** (SNC-015, SNC-021-SNC-022, SNC-025 – SNC-029).
LIR-SNC-005	Cultural Heritage	2.3 The Council also notes that historic paths and routes have not been	As defined within the Planning Practice Guidance (PPG) (MHCLG 2016; updated 2024), 'Non-

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		identified as non-designated heritage assets in accordance with Policies HE5 and HE7 of the NPPF (2026). They together with dispersed designated heritage assets, which are often located in isolated positions away from settlements, form important components of the historic agricultural landscape experienced when moving through the area. Therefore, cumulative effect of the solar PV sites, project substations, national grid substation, and BESS will erode the rural character and settings of dispersed heritage assets, resulting in a meaningful reduction in their contribution to local sense of place.	Designated Heritage Assets' are *"buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets"* (Paragraph: 039 Reference ID: 18-039-20190723). The Applicant notes that 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 associated appendices, and mitigated where potential impacts were identified.
LIR-SNC-006	Landscape and Visual	2.4 The Proposed Development would result in extensive and, in a number of locations, significant adverse effects on local landscape character and on the visual and recreational experience of a well-used network of PRoWs. The present parameters permit panels up to 4.5 metres high and do not consistently provide adequate offsets from routes. Planting would soften or filter some views, particularly at distance, but would not restore the open rural context	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 integration and visual screening of the Scheme. Embedded mitigation measures include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate

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		or remove the enclosure created along paths.	the Scheme into the surrounding context and reduce adverse effects. The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances within the design for the affected PRoW, a minimum 15m offset is applied to the PRoW from the Scheme elements. Further mitigation measures are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014].** Mitigation planting is itself a component of the Scheme and has been assessed. It may alter openness, enclosure, landscape pattern and the composition of views. However, an identifiable change is not automatically an adverse effect of the same scale as the infrastructure it mitigates. The planting reinforces characteristic landscape features, responds to published landscape objectives and reduces the prominence, contrast and perceived influence of energy infrastructure.
LIR-SNC-007	Landscape and Visual	2.5 At the scale of the host fields and development parcels, conversion from agricultural countryside to extensive energy infrastructure would ordinarily represent a large or major change to landscape character. Planting may reinforce selected features, but it does	The Applicant acknowledges that the Scheme would introduce a change to the character of the host fields and wider district landscape character areas during its operational lifetime, these are assessed and presented as significant effect within the **ES Volume**

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		not reverse the loss of the open rural land use. 2.6 The effects extend beyond individual field parcels. The scale and distribution of Sites 1–10 would alter the perceived character of Landscape Character Areas B1 and E2 and would be experienced from numerous routes by high-susceptibility recreational receptors.	**1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices. The Applicant agrees that landscape effects are not necessarily confined to individual host fields. This is reflected in the **ES Volume 3, Appendix 7.1 LVIA Methodology [APP-118]**, which assesses the geographical extent of effects at Site, adjacent landscape, Landscape Character Area and wider landscape scales, as appropriate. When assessing the magnitude of change, the geographical extent of change should be considered in the context of the much broader extent of the LCAs within which the Sites are located. The host fields form only discrete parts of the wider LCA B1 and E2, as presented in **ES Volume 2, Figure 7.2 Landscape Character Plan [APP-067].** The extent of LCA B1 and E2 extend further north and west than the Scheme search area. Therefore, the Scheme would not result in the loss or alteration of the defining characteristics across those LCAs as a whole. This distinction between effects at Site or adjacent landscape level and effects extending across an entire LCA is expressly recognised within the LVIA methodology, which requires geographical extent to be considered separately when determining the magnitude of landscape effect. The Applicant therefore considers that the landscape effects should be understood as effects upon

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			particular parts of the LCAs during the operational lifetime of the Scheme, rather than as the permanent replacement or loss of the open rural character of B1 and E2 in their entirety. The landscape strategy would retain and reinforce characteristic landscape features, and mitigation planting would establish over time which would reduce the perception of the Scheme.
LIR-SNC-008	Landscape and Visual	2.7 The existing descriptions of Landscape Character Assessments B1 and E2 would no longer fully describe the affected landscape if the scheme were built at the maximum parameters. The new concentration of solar arrays, substations, BESS infrastructure, fencing and enclosing planting would become a material characteristic. This is an indicator of the scale of landscape change.	The Applicant does not agree that the Scheme would result in the published descriptions of LCAs B1 and E2 no longer being applicable, or that the Scheme infrastructure and proposed planting would necessarily become defining characteristics of those LCAs as a whole. In addition to the response given in LIR-SNC-007, landscape character is derived from the interaction of a range of characteristics and features, rather than openness or agricultural land cover alone. As presented in the **ES Volume 3, Appendix 7.2 Landscape Baseline [APP-119]**, whilst both LCA B1 and E2 are described as being open in character LCA B1 is described as containing "small blocks of deciduous woodland" and LCA E2 is described to have "a landscape of both openness and enclosure". The baseline demonstrates that the landscape within the areas affected by the Scheme already contains a varied pattern and structure with fields, hedgerows, hedgerow trees, tree belts and woodland blocks. These features create local enclosure and framed or

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			wooded views. For example, Sites 3, 7, 8 and 9 are influenced by woodland blocks, tree belts and hedgerows that create varying degrees of enclosure and intimacy within the wider agricultural landscape. At Site 1 specifically, hedgerows, hedgerow trees, linear tree belts and woodland blocks are already observable features which limit visibility within this otherwise open, large-scale landscape. LCA E2 Great Moulton Plateau Farmland in which Site 1 is located is also influenced by tall structures including masts and poles, disused airfields and other human influences. The proposed landscape measures, as presented on the **Green Infrastructure Strategy [REP1-013]**, include strengthening of hedgerows, tree belts and woodland planting, and should therefore not be regarded simply as introducing an entirely new landscape feature. Instead, the proposed mitigation would reinforce existing landscape elements that are already present within the receiving landscape, albeit with their influence varying locally.
LIR-SNC-009	Landscape and Visual	2.8 Year 15 planting should not automatically be treated as removing or materially reducing an effect where it replaces an open outlook with a vegetated corridor. Screening the infrastructure can itself increase	The Applicant agrees that the establishment of mitigation planting at Year 15 should not automatically be assumed to remove a landscape or visual effect. Mitigation planting is itself a component of the Scheme and has been assessed as such. It may alter openness, enclosure, landscape pattern

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		enclosure, interrupt long views and create a tunnel effect. The resulting route experience may remain substantially changed and adverse.	and the composition of views. However, an identifiable change is not automatically an adverse effect of the same scale as the infrastructure it mitigates. Where the planting reinforces characteristic landscape features, responds to published landscape objectives and reduces the prominence, contrast and perceived influence of energy infrastructure, the overall magnitude of effect can reasonably reduce effects. The Applicant does not agree that the establishment of planting would necessarily result in a substantial adverse change. The existing landscape is not uniformly open. The baseline identifies numerous locations where hedgerows, tree belts and woodland already contain, frame or interrupt views. The effect of planting is therefore considered on a location-specific basis. The fact that a route experience would be different from the baseline at Year 15 does not, of itself, mean that the effect would remain substantially adverse; the significance of the residual effect is a matter of professional judgement taking account of the resulting landscape and visual composition.
LIR-SNC-010	Landscape and Visual	2.9 The visual evidence does not consistently illustrate the reasonable worst case. Additional views are needed where PRoWs cross or closely adjoin development, together with clearer evidence of the kinetic	**Figure 7.5.1 Zone of Theoretical Visibility with View Locations [REP1-030]** present the view locations selected for the assessment. The view location selection considers the element of the Scheme and visual screening elements on Site. The selection includes numerous locations on PRoWs that

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		experience. The Type 3 visualisations do not provide the level of geometric and locational certainty that would be expected where fine judgements depend on panel height, path alignment and planting position.	either cross, pass through, or lie immediately adjacent to the Scheme areas. These view locations were identified to represent the range of likely visual experiences and were developed through consultation with South Norfolk District Council. To provide further evidence regarding the experience of users travelling through the landscape, the Applicant prepared the PRoW Visual Amenity Assessment is included in **ES Volume 3**, **Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]** and is submitting a sequential assessment of key PRoWs and recreational routes at Deadline 2. This will supplement the representative view locations assessment and provide additional information on the changing ('kinetic') visual experience along routes where users pass through or alongside the Scheme. With regard to the visualisation methodology, whilst the visualisations are classified as Type 3 in accordance with Landscape Institute Technical Guidance Note 06/19, the Applicant adopted a more rigorous approach to camera positioning and model verification than the minimum requirements of a Type 3 output. A detailed visualisation methodology is presented in the **Landscape and Visual Methodology [APP-118]** which meets many of the requirements of Type 4 output**.** Camera locations

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			were established using GPS and verified using aerial imagery and reference features, with viewing positions typically accurate to within ~1 metre. The 3D model was aligned against identifiable features visible within the baseline photography to provide a robust representation of the scale, extent and location of the Scheme. The Applicant therefore considers that the visualisations provide an appropriate and proportionate level of geometric and locational accuracy for the purposes of the LVIA. The Applicant is keen to establish common ground on this particular point through the Statement of Common Ground process. In woodland locations such as at BESS VL1 and Site 7 VL13, where extensive tree cover limits the availability of fixed reference features, there is a greater degree of uncertainty; however, this does not materially affect the visualisations which demonstrate that views of the Scheme would be filtered through the intervening vegetation at these locations.
LIR-SNC-011	Landscape and Visual	2.10 The district already hosts major energy and infrastructure schemes. The combined visual and landscape effects of the proposed route, together with existing and consented NSIPs, are expected to intensify the landscape	The cumulative assessment included within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** considers a number of committed developments which have the potential to result in cumulative effects on Landscape and Visual receptors within the associated Study Area. The list

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		harm as a result of industrial-scale infrastructure incompatible with rural character of South Norfolk district.	has been formed by considering those committed developments which are located within the same identified published landscape character areas (considered within the LVIA), and / or that interact with visual receptors in relation to the Scheme within the Study Area, which include residents, recreational users of PRoW / long-distance routes, and road users. A number of short-listed committed developments which lie beyond the Study Area have been discounted, as these developments are not shown to have intervisibility with the Scheme based on the ZTVs and / or are located in a different district landscape character area, and therefore unlikely to result in significant cumulative landscape and visual effects.
LIR-SNC-012	Landscape and Visual	2.11 To support clarity, an area where additional examination or discussion may assist the Examining Authority is the landscape and visual impacts (as set out in 'section 6 (Landscape and Visual)' of South Norfolk's Relevant Representation). 2.12 Attention is also drawn to the various Town and Country Planning Act (TCPA) applications for solar farms and BESS situated nearby to the draft order limits.	The Applicant previously responded to these points in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008].** These principally included Arboricultural matters, the approach to hedgerow assessments, and detail within the Outline LEMP.

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LIR-SNC-013	Noise and Vibration	2.13 The Council has significant concerns regarding the adequacy of the noise and vibration assessment. In particular, the absence of baseline noise monitoring limits confidence in the predicted effects, especially in quiet rural locations. The reliance on percussive piling for installation of solar panels creates risk of notable construction nuisance.	The Applicant does not agree that the noise and vibration assessment is limited by an absence of baseline sound monitoring. Environmental sound surveys were undertaken at 51 measurement positions across the Scheme, and the results are presented in **ES Volume 3, Appendix 12.1 – Baseline Sound Survey Report [APP-178]**. The survey results informed the construction, operational and decommissioning assessments presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The Applicant understands that the Council's concern relates more specifically to the absence of a separately reported assessment for the evening period, rather than the absence of a night-time assessment. Night-time and early morning operational noise were assessed in the ES. In response to the Council's request, a separate assessment of the evening period from 19:00 to 23:00 has subsequently been undertaken and is presented in the **Evening Noise Assessment [REP1-101]**. This supplementary assessment does not identify any significant operational noise effects or alter the overall conclusions of the ES. Construction noise has been assessed using the methodology in BS 5228-1:2009+A1:2014. The measured ambient sound levels were used to establish the applicable construction noise

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			assessment thresholds, including for Horizontal Directional Drilling activities. The assessment therefore takes account of the quiet rural sound environment. Percussive piling has been assessed as a reasonable worst-case installation method. The assessment identifies where the applicable construction noise thresholds may be exceeded and considers the anticipated duration of the works when determining significance. **The Outline CE MP [REP1-058]** requires construction works to be undertaken in accordance with Best Practicable Means, including the selection of less noisy equipment and working methods where practicable. The Applicant therefore considers that the assessment provides an appropriate basis for identifying and mitigating likely noise and vibration effects.
LIR-SNC-014	Noise and Vibration	2.14 The project appears to rely entirely on percussive piling, which is a major source of noise and vibration nuisance. A justification for this approach should be provided and a geo-environmental or geotechnical investigation undertaken to confirm whether percussive piles are appropriate for site conditions. Without this information, the suitability of pile types cannot be established, and this	**Ground Conditions** The detailed design of the Scheme, including detailed foundation design will be informed by the interpretative geotechnical assessment that will be prepared following completion of the post-consent ground investigation. The ground investigation will include boreholes to at least the full depth of the proposed PV array foundations, and mechanically excavated trial pits

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		method is not in accordance with Best Practicable Means (BPM).	throughout the Order Limits to investigate the ground conditions, alongside in-situ geotechnical analyses and geotechnical laboratory analyses of soil samples. Percussive piles are used routinely across the UK in solar developments and are geotechnically appropriate for use in both cohesive and granular soils and have been included for assessment as a reasonable worst-case method (see below). Furthermore, as described in the **Outline CEMP [REP1-058]** a Foundation Works Risk Assessment will be undertaken post-consent for structures requiring deep foundations and/or piling such as the Project Substations, BESS and National Grid Substation. **Noise and Vibration** Percussive piling has been assessed as a reasonable worst-case method for the installation of the Solar PV Panel mounting structures. Assessment of this method does not constitute a commitment that percussive piling will be used throughout the Scheme. As reported in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, the assessment identified that piling noise may exceed the Significant Observed Adverse Effect Level at one receptor, NSR29, when works are undertaken in close proximity. At that receptor, the effect was assessed as short-term, moderate adverse and not significant, because piling

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			works at that proximity are not expected to exceed the temporal threshold for a significant effect. At other receptors, piling noise was assessed as giving rise to short-term, negligible to minor adverse effects, which are not significant. For vibration, the assessment predicted a level of approximately 1.0 mm/s PPV at NSR29, which is approximately 45 m from the nearest potential solar PV piling works, with lower levels predicted at receptors further from the works. The resulting vibration effects from piling of the Solar PV Panel supporting structures were assessed as short-term, negligible to minor adverse and not significant. The design of the Scheme will be informed by the post-consent ground investigation. The **Outline CEMP [REP1-058]** requires construction works to be undertaken in accordance with Best Practicable Means, as stipulated in the Control of Pollution Act 1974 and BS 5228-1:2009+A1:2014. This includes the selection of less noisy equipment and working methods where practicable. The detailed foundation and installation method will therefore be determined having regard to ground conditions, engineering requirements, environmental effects and the application of Best Practicable Means. The Applicant does not agree that the assessment of a reasonable worst-case percussive piling method

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			demonstrates that the Scheme is inconsistent with Best Practicable Means.
LIR-SNC-015	Noise and Vibration	2.15 Evening time noise levels are currently absent from the Noise Impact Assessment in the Environment Statement which is essential as there is a distinct drop off in noise levels in the evening in rural locations which could impact the ability of the applicant to meet their agreed noise levels. Failure to assess the noise levels in this manner, acknowledging the differing background noise levels at different times of the day, would result in the evening noise levels being emitted at a significantly higher level than the agreed background noise level limit which could result in a statutory nuisance being declared.	The Applicant acknowledges the importance of considering the evening period in the quiet rural sound environment. The suggestion that evening background sound levels have not been considered is, however, no longer current. **The Evening Noise Assessment [REP1-101]**, submitted at Deadline 1, presents an assessment of operational noise during the evening period from 19:00 to 23:00. The Evening Noise Assessment confirms that no additional significant effects are identified and that the conclusions and mitigation presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** remain unchanged. Operational noise is controlled through the **Outline OE MP [REP1-060]**, which is secured by **Requirement 14 of the Draft DCO [REP1-014]**. The Applicant therefore does not agree that operational noise would be permitted to occur at an uncontrolled level or that the omission alleged by the Council remains outstanding.
LIR-SNC-016	Noise and Vibration	2.16 There is currently uncertainty and inadequacy in the information available as insufficient details of the National Grid Substation have been provided or	The National Grid Substation has been included in the operational noise assessment. As the final equipment selection is not yet available, the assessment adopts representative and conservative

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		are known at this time. As such, whilst the noise levels from the National Grid Substation have been stated in the Noise Impact Assessment to be at or below the background noise level, there is ambiguity in how this conclusion was reached.	source data, including four transformers, each with a sound power level of 85 dBA. This provides a reasonable worst-case basis for the assessment and detailed design. The final National Grid Substation equipment and layout will be subject to the noise controls secured through the **Outline OEMP [REP1-060]**. The National Grid Substation must be located or, where this is not practicable, mitigated so that the predicted façade-incident rating level at the nearest residential receptors does not exceed the applicable committed level. The **Outline OEMP [REP1-060]** is secured through Requirement 14 of the **Draft DCO [REP1-014]**. An operational noise assessment will be undertaken once the design and equipment selection have been finalised to demonstrate compliance with the secured noise requirements. The Applicant therefore does not agree that the assessment omits the National Grid Substation or that the proposed controls depend solely on the indicative assessment-stage equipment data.
LIR-SNC-017	Ecology and Biodiversity	2.17 The Council acknowledges the applicant's commitment to Biodiversity Net Gain (BNG) and its inclusion within the DCO Requirements.	The potential impacts on arboricultural assets including ancient or veteran trees and ancient woodlands are assessed in **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]**.

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		SNDC remains concerned about potential impacts on bats (notably barbastelles), County Wildlife Sites and Roadside Nature Reserves, arboricultural assets including veteran/ancient trees and ancient woodlands. SNDC is also concerned about the potential losses as a result of decommissioning.	The likely effects on ecology and biodiversity, including the receptors named here,are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document** [**APP-212**]. Where impacts cannot be avoided then appropriate mitigation measures have been proposed with these to be secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064]** and **Outline Protected Species Mitigation Strategy [REP1-050]**. With regard to bats, bat activity surveys undertaken are reported in **ES Volume 3, Appendix - 8.6 Bat Activity Survey Report [APP-157]** with an assessment in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** where the colony in Little Wood and Spring Wood are considered. During the design process, the Cable Route Corridor was refined and moved as far away from Tyrells Wood as reasonably practicable. Minimum design offsets would be applied to watercourses, hedgerows,

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			trees and woodland, as set out in the **Design Principles, Parameters and Commitments [REP1-078]**, which would protect opportunities for bat activity and foraging. There would be no loss of veteran/ancient trees and ancient woodlands as secured through the **Outline CEMP [REP1-058]**. As set out in the **Outline DEMP [REP1-062]**, the National Grid Substation and the Grid Connection Infrastructure would remain in situ. The management of all planting for the National Grid Substation will be the responsibility of National Grid Electricity Transmission, and this will remain in place post decommissioning of the Scheme. Regardless of any future ownership, the undertaker as defined in the **Draft DCO [REP1-014]** will remain bound by the legally enforceable requirements of the DCO. A detailed DEMP will be prepared substantially in accordance with the **Outline DEMP [REP1-062]** and must be submitted to and approved by the relevant planning authority prior to the commencement of decommissioning. This is secured through Requirement 21 in Schedule 2 of the **Draft DCO [REP1-014]**. The Applicant confirms that none of the land for solar development will be brownfield after decommissioning as the land will be reinstated and soils restored to the previous condition as far as

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			practicable. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
LIR-SNC-018	Cumulative Impacts	2.18 South Norfolk faces an unprecedented concentration of energy-related NSIPs, major grid reinforcements and associated infrastructure. The Council is concerned about cumulative impacts and in-combination effects across environmental, visual, heritage, ecological and socio-economic domains.	The Applicant is aware of other projects in the region. The **ES [APP- 042 to 054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. A comprehensive Cumulative Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA Methodology [APP-038]. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES. The Applicant will continue to discuss the list of cumulative schemes with SNC as the examination progresses. Each topic chapter within the **ES [APP-042 – APP-054]** sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or Scheme. A summary of all cumulative effects is provided within Table 20.4 of **ES Volume 1, Chapter 20 Summary of Residual Significant Effects [APP-056].**

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			As set out in response to Action Point 45 in **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action** Points [REP1-098] the Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on an Interrelationships document, which considers large scale energy infrastructure proposals in Norfolk (and beyond its borders if relevant), including the Norwich to Tilbury project. A meeting was held jointly between the Applicant and both local authorities on 28 September 2026, the Interrelationships report being an agenda item. Ongoing dialogue will take between the parties with further meetings scheduled shortly after Deadline 1. The Applicant proposes to submit the Interrelationships report into the Examination once the approach is agreed.
LIR-SNC-019	Key Issues for Examination	2.19 The Council identifies the following matters as most significant for the Examining Authority: 1. The scale and significance of adverse landscape and visual effects; 2. The level of less-than-substantial harm to heritage assets and	The Applicant welcomes SNDC's engagement on these matters, and notes that updated positions subject to further discussion will be presented within the SNDC SoCG to be submitted at Deadline 3. Detailed responses have been provided to each of the matters raised by SNDC herein: • Landscape and visual – comment IDs LIR-SNC-059 to 073;

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		whether public benefits justify this harm; 3. The adequacy of the noise and vibration assessment, including the need for baseline monitoring and justification for piling methods; 4. The sufficiency and enforceability of ecological mitigation and the justification for compensation measures; 5. The scope and mitigation of cumulative effects, particularly in combination with other NSIPs; 6. The suitability, clarity and enforceability of Draft DCO Requirements, including removal of any immunity from prosecution.	• Cultural heritage – comment IDs LIR-SNC-044 to 058; • Noise and vibration – comment IDs LIR-SNC-074 to 077; • Ecology and biodiversity – comment IDs LIR-SNC-080 to 088; • Cumulative effects – comment IDs LIR-SNC-089 to 093; • DCO Requirements – comment IDs LIR-SNC-149 to 154.
LIR-SNC-020	Policy and compliance	2.20 South Norfolk District Council acknowledges the national importance of meeting net zero targets and large-scale renewable energy projects such as solar farms. However, based on the information presented within the application, the Council considers that the project will result in substantial	The Applicant notes this comment. The Applicant's position on the planning balance is set out within the **Planning Statement [REP1-074]**, which concludes that the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible. The residual significant adverse

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		localised harm, particularly in relation to heritage, landscape character, and residential amenity. 2.21 The Council's position is that these local harms must be given significant weight in the planning balance and that further work is required to refine mitigation, address evidence gaps and strengthen the Draft DCO Requirements to ensure effective protection of local communities and environmental assets.	effects in relation to landscape and visual, BMV quality land are considered to be outweighed by the substantial benefits of the Scheme, including the contribution to Clean Power 2030, and localised benefits to biodiversity, green infrastructure strategy, and employment and training. The Applicant has provided detailed comments against matters raised by the Council in respect of the evidence provided within the ES within this response, specifically at comment IDs LIR-SNC-010, SNC-039, SNC-040, SNC-064, and SNC-108.
LIR-SNC-021	Scheme Description	3.1 The East Pye Solar Project seeks development consent for a new 500MW solar farm in addition to associated electricity infrastructure including three 132KV substations, three 400KV substations, and a new National Grid substation alongside a Battery Energy Storage System (BESS). The proposed site extends to approximately 2,700 acres across the South Norfolk District affecting multiple parishes. 3.2 Within South Norfolk District, the proposal would introduce 28 sub-sites containing solar panels, approximately	The Applicant notes this comment.

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		up to 4.5 metres in maximum height of rotation, together with associated cable route corridors, access tracks, works areas, temporary construction compounds and ancillary infrastructure.	
LIR-SNC-022	Scheme Description	3.3 Key elements of the project affecting South Norfolk include: 1. Construction and operation of new 500MW solar panel sites and associated substations; 2. Construction and operation of a new BESS; 3. Construction and operation of new National Grid Substation; 1. Removal or modification of existing 132kV infrastructure where required; 4. Creation of temporary access routes, construction compounds and laydown areas; 5. Earthworks, foundation construction and associated enabling works.	The Applicant notes this comment.

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		6. Vegetation clearance, including removal of some hedgerows and veteran trees; 7. Long-term vegetation management within the sites to maintain safety clearances. 3.4 The proposal traverses predominantly rural agricultural land, interspersed with dispersed settlements, farmsteads, heritage assets, ecological features and areas of recognised landscape sensitivity.	
LIR-SNC-023	Construction	3.5 Construction activities are expected to include: 2. Establishment of temporary compounds and access tracks; 3. Foundation installation for multiple substations and the BESS; 4. Erection of solar panels and driven pile ground mounts; 5. Underground cabling works in certain locations; 6. Removal of existing infrastructure where applicable.	The Applicant notes this comment. As set out within **ES Chapter 4 – The Scheme [REP1-022],** subject to being granted development consent and following a final investment decision, the construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. On this basis, it is expected that the Scheme could be completed by the end of 2030 and energised in 2031. However, the construction period will vary depending on detailed layout design and potential environmental constraints on the timing of construction activities.

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		3.6 Construction would occur over two-three years, with works progressing across the district. The Council asks the Examining Authority to note that the district is also host to several other NSIPs and large-scale developments, raising the potential for overlapping construction periods and associated cumulative disruption. The significance of these cumulative construction effects will depend on the extent of temporal overlap between projects and the effectiveness of proposed mitigation and coordination measures.	As set out in response to Action Point 45 in **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]** the Applicant is continuing to engage with Norfolk County Council and South Norfolk Council on an Interrelationships document, which considers large scale energy infrastructure proposals in Norfolk (and beyond its borders if relevant), including the Norwich to Tilbury project. A meeting was held jointly between the Applicant and both local authorities on 28 September 2026, the Interrelationships report being an agenda item. Ongoing dialogue will take between the parties with further meetings scheduled shortly after Deadline 1. The Applicant proposes to submit the Interrelationships report into the Examination once the approach is agreed.
LIR-SNC-024	Operational Phase	3.7 Once constructed, the solar panels will have a generating capacity of 500MW and will include substations that are also likely to host other renewable energy grid connections and will form a permanent feature of the local landscape. Operational activities include routine inspection, maintenance and vegetation management. No significant operational traffic is	The Applicant notes this comment.

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		anticipated, though periodic access will be required for inspection or repair. 3.8 The height and prominence of the solar panels at approximately 4.5 metres tall will have the visual and landscape effects and impacts on the setting of heritage assets for the duration of the development. Some operational constraints, particularly relating to vegetation clearance and tree management within the various sites, will continue throughout the lifetime of the infrastructure.	
LIR-SNC-025	Scheme Description	3.9 Temporary land take is required for construction compounds, access routes and materials handling areas. Permanent land requirements are required for the solar array sites, BESS site, and substation sites as well as any easements and access for maintenance. 3.10 Construction may require the alteration or temporary closure of public rights of way and minor roads. Further detail on access management and traffic impacts is expected to be	The Applicant notes this comment. The land required for the Scheme is long term but reversible with only the National Grid substation and grid connection infrastructure being permanent.

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		secured through DCO Requirements and supporting management plans.	
LIR-SNC-026	Cumulative and In-Combination Effects	3.10 The district hosts several major energy projects, including substations, onshore wind farm connections, solar farm connections and battery energy storage systems, as well as overhead line upgrades through the Norwich to Tilbury DCO currently awaiting recommendation by the ExA. The interaction between the proposed scheme and this existing and emerging infrastructure base is addressed further in Section 7 of this LIR.	The Applicant notes this comment.
LIR-SNC-027	Cumulative and In-Combination Effects	4.1 South Norfolk District hosts a substantial number of NSIPs and major planning applications that are either consented, operational, under construction, or at pre-application stage. These developments provide essential context for understanding the cumulative environmental, landscape, heritage and socio-economic impacts associated with the East Pye Solar Project. 4.2 The projects listed below vary in scale and function, including major road infrastructure, solar farms, BESS, wind	The Applicant notes this comment and refers to LIR-SNC-023 in respect of the Interrelationships Report. The effects of the Scheme, in cumulation with other developments, is assessed in the **ES [APP-036 to APP-195]**.

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		farm grid connections and significant residential or employment developments. Their spatial and temporal overlap with the proposed development is a key factor in the Council's assessment of cumulative effects.	
LIR-SNC-028	Cumulative and In-Combination Effects	4.3 Several NSIPs within or near the district interact with the proposed overhead line corridor. These include: 1. A47 – A11 Thickthorn Junction (TRO10037): Consent granted October 2022 and now under construction; 2. Hornsea Three Offshore Wind Farm (EN010080): Consented December 2020; construction underway including the converter station; 3. Norwich to Tilbury Overhead Lines Project (EN020027): Examination closed early August 2026 and is pending recommendation by the ExA; 4. Sheringham and Dudgeon Offshore Wind Farm Extensions (EN010109): Consented April	The Applicant confirms that the NSIP Schemes listed within Appendix C of SNC's response are included within the cumulative schemes list provided within **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** and have therefore been assessed within the cumulative assessments presented within the respective topic chapters and summarised within **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056].**

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		2024 and pre-commencement surveys underway; 4.4 These NSIPs collectively form a major part of the region's transition toward renewable energy generation and transmission. Their proximity to the draft Order Limits increases the potential for cumulative impacts on landscape character, ecological resources, local amenity and construction-phase disruption.	
LIR-SNC-029	Cumulative and In-Combination Effects	4.5 Alongside NSIPs, the district has a high volume of significant planning applications under the TCPA, many of which are located near the corridor or associated substations. These include large residential schemes, commercial and employment hubs, solar farms, BESS installations and supporting energy infrastructure. The applications range from outline permissions to reserved matters and variations to existing consents, with many approved and others pending consideration. 4.6 Alongside this, a full list is included at Appendix C and examples include:	Several of the TCPA schemes provided within Appendix C of the LIR are already included in cumulative schemes list provided within **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116].** The Applicant will review the remaining TCPA schemes provided in Appendix C and provide an update at Deadline 3.

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		1. Major housing and employment development west of the A140 in Long Stratton (2018/0112); 2. Multiple employment, logistics and industrial phases at Ipswich Road, Keswick (2021/1034–1039); 3. Numerous solar farm and BESS applications across the district (e.g., 2021/2495, 2021/2645, 2023/0617, 2023/1055). 4. Grid connection infrastructure for consented NSIPs (e.g., Hornsea Three, Sheringham Shoal and Dudgeon); 5. Battery storage and grid reinforcement infrastructure adjacent to Norwich Main Substation, including the 2024 substation extension; 6. A broad range of residential developments across villages including Diss, Roydon, Newton Flotman, Bracon Ash, Aslacton and others.	

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		4.7 Many of these developments introduce additional landscape change, construction activity, traffic generation and ecological pressures. When considered alongside the solar project, they illustrate cumulative capacity issues, particularly around the proposed Norwich to Tilbury Overhead Line route where multiple energy-related schemes converge.	
LIR-SNC-030	Cumulative and In-Combination Effects	4.8 The concentration of NSIPs and large-scale TCPA developments within South Norfolk is unusually high. Several projects are spatially clustered along strategic corridors or around key substations. This increases the probability of cumulative environmental effects, including: 1. Intensification of energy infrastructure in sensitive landscapes; 2. Combined visual impacts from multiple tall structures and extensive land use; 3. Overlapping construction timeframes extending the duration of disruption for	See the Applicant's response to LIR-SNC-018, LIR-SNC-039, LIR-SNC-072, LIR-SNC-091, and LIR-SNC-092. .

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		residents, businesses and transport networks; 4. Increased pressure on ecological receptors, particularly where grid related schemes interface with designated habitats. 4.9 These interactions are addressed in more detail in the topic-based assessments within Section 7 of this LIR. The breadth and scale of associated development underline the importance of a robust cumulative impact assessment for the DCO application. 4.10 The volume and scale of relevant NSIPs and major TCPA applications within South Norfolk mean that the proposed East Pye Solar project does not exist in isolation. Rather, it forms part of a wider and growing body of energy and infrastructure development. Understanding this wider context is essential to assessing the significance of impacts on landscape, heritage, ecology and community amenity.	
LIR-SNC-031	Policy Compliance	5.1 This section summarises the national and local planning policies that	The Applicant notes this comment. An appraisal of the Scheme's compliance against the relevant local

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		inform the assessment of the East Pye Solar Project as it affects South Norfolk District. The policies listed here provide the basis for evaluating the acceptability of impacts on heritage, landscape, ecology, amenity, design and environmental quality. 5.2.1 The statutory development plan for South Norfolk consists of: 1. The Greater Norwich Local Plan (GNLP), adopted March 2024, covering Broadland, South Norfolk and Norwich; The South Norfolk Local Plan – Development Management Policies (2015). 2. National Planning Policy Framework (NPPF), revised 17 August 2026. 5.2.2 These documents provide the principal expression of planning objectives and local environmental sensitivities within South Norfolk and therefore remain relevant in the assessment of local impacts arising from the proposed development.	policies is set out within the **Planning Statement [REP1-074]** and the **Policy Compliance Document [REP1-076].** This includes the relevant policies of the Greater Norwich Local Plan (2024) and the South Norfolk Local Plan – Development Management Policies (2015). Both documents were updated at Deadline 1 to reflect the updated version of the NPPF published in August 2026.

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LIR-SNC-032	Policy Compliance	5.3.1 The GNLP establishes strategic spatial planning and environmental objectives for the district. The following policies are particularly relevant to the proposed development: 1. GNLP Policy 2 – Sustainable Communities: Requires development to support strong, healthy communities and contribute positively to environmental quality; 2. GNLP Policy 3 – Environmental Protection and Enhancement: Seeks to safeguard and enhance landscape character, biodiversity, natural assets and environmental quality. 5.3.2 These policies provide the basis for assessing the project's effects on environmental quality, landscape character and biodiversity and its compatibility with sustainable development objectives.	The Applicant notes the relevance of the GNLP Policies 2 and 3, and has set out the Scheme's compliance with these policies in the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**.
LIR-SNC-033	Policy Compliance	5.4.1 The South Norfolk Development Management Policies (2015) set out detailed criteria for assessing environmental, heritage, landscape and	The Applicant notes the relevance of the South Norfolk Development Management Policies (2015) and has set out the Scheme's compliance with these policies in the **Planning Statement [REP1-074] and**

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		amenity impacts. Relevant policies include: 1. DM1.4 – Environmental Quality and Local Distinctiveness; 2. DM3.8 – Design Principles; 3. DM3.13 – Amenity, Noise and Quality of Life; 4. DM3.14 – Pollution, Health and Safety; 5. DM4.4 – Natural Environmental Assets; 6. DM4.5 – Landscape Character Areas and River Valleys; 7. DM4.8 – Protection of Trees and Hedgerows; 8. DM4.9 – Incorporating Landscape into Design; 9. DM4.10 – Heritage Assets 5.4.2 These policies are central to evaluating the effects of the proposed project on: 1. The setting of heritage assets; 2. Local landscape character and long views;	**Policy Compliance Document [REP1-076]**. The Applicant's consideration of compliance with planning policy has been informed by the assessments in the ES and in particular relating to - the setting of heritage assets; Local landscape character and long views; noise, vibration, air and water; trees, hedgerows and irreplaceable habitats; residential amenity and local distinctiveness.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		3. Environmental quality, including noise, vibration, air and water; 4. Trees, hedgerows and irreplaceable habitats; 5. Residential amenity and local distinctiveness.	
LIR-SNC-034	Policy Compliance	5.5.1 The NPPF (2026) introduced National Development Management Policies (NDMP's) and set out further criteria for assessing environmental, heritage, landscape and amenity impacts. Relevant policies include: • DP3 – Key Principles for Well-Designed Places; • DP4 – The Design Process; • P2 – Ground Conditions; • P3 – Living Conditions and Pollution; • N2 – Improving the Natural Environment; • HE5 – Assessing Effects on Heritage Assets; • HE6 – Proposals Affecting Designated Heritage Assets;	The Applicant has updated the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]** at Deadline 1 to reflect the NPPF published in August 2026.

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		• HE7 – Decisions on Non-Designated Heritage Assets.	
LIR-SNC-035	Policy Compliance	5.6.1 The following supplementary guidance is relevant to understanding local sensitivities to major energy infrastructure: • South Norfolk Landscape Susceptibility in Relation to Energy Generation, Storage and Transmission SPD, adopted February 2026. 5.6.2 This SPD identifies areas within the district particularly sensitive to large scale energy infrastructure and therefore provides important context for assessing the scheme's potential landscape and visual impacts and is appended as Appendix B.	The Applicant draws attention to the position in the **Statement of Common Ground with South Norfolk District Council [REP1-086]** at SNDC LV2. SNDC has previously confirmed that the SPD is not relevant to the Scheme. Nevertheless the Applicant is seeking to provide further detail with regard to the determination of susceptibility for landscape receptors at a future deadline in response to LIR-NCC-038.
LIR-SNC-036	Policy Compliance	5.7.1 Across the development plan and supplementary guidance, a consistent theme emerges of the need to protect South Norfolk's landscape character, heritage assets, biodiversity and residential amenity, while ensuring that development contributes positively to environmental quality and local distinctiveness.	The Applicant notes the Councils comment.

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		5.7.2 These policies, taken together, form the basis for the topic-based assessments set out in Section 7, in which the Council evaluates how the proposed solar farm and BESS project aligns or conflicts with specific policy requirements.	
LIR-SNC-037	Landscape and Visual	6.1.1 South Norfolk is a predominantly rural district characterised by gently undulating farmland, tributary valleys, woodland, dispersed villages, traditional market towns and an extensive network of public rights of way. The landscape is generally perceived as open and expansive, with long views across plateau farmland and river valleys. These characteristics are central to the district's sense of place and underpin its landscape sensitivity. 6.1.2 The district contains numerous designated heritage assets, including listed buildings, scheduled monuments and conservation areas. Many of these assets are associated with historic agricultural landscapes, traditional farmsteads and small settlements. Their settings are often defined by open rural surroundings and long-distance views,	The Applicant acknowledges those characteristics of the South Norfolk landscape, which contribute to the rural character. These characteristics, together with the historic landscape pattern and the relationship of the Site to the surrounding landscape, have been considered within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**. The Applicant further acknowledges the designated heritage assets the presence of numerous Designated Heritage Assets within the District, with such assets identified and discussed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is, in turn, 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 – AS-021]**.

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		which contribute significantly to their significance and local distinctiveness.	
LIR-SNC-038	Landscape and Visual	6.2.1 The district is structured around several historic market towns i.e. Diss, Harleston, Loddon and Wymondham which serve as centres for employment, cultural activity, education and services. Beyond these towns, the district comprises numerous villages and hamlets, many of which feature heritage assets, rural amenities and strong community identities. 6.2.2 South Norfolk's rural communities are sensitive to change arising from large-scale infrastructure due to their reliance on high-quality landscape, local tranquillity and access to recreational assets such as walking and cycling routes. Tourism and small local businesses also form part of the local economy, benefitting from the area's environmental and cultural qualities.	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred will be addressed through compensation; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry. The Applicant does not therefore consider that the Scheme would make the area unattractive to visitors. The **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** follows recognised guidance and considers effects on the landscape resource and

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			tranquillity, and visual amenity (including recreational experience on affected PRoW's).
LIR-SNC-039	Landscape and Visual	6.3.1 Land use across the district is dominated by agriculture, interspersed with woodland, hedgerows, isolated dwellings and small clusters of historic buildings. There is a growing concentration of energy and grid-related infrastructure throughout the district, primarily along the overhead line route from Norwich Main including wind farm grid connections, solar farm cabling routes and battery energy storage systems. 6.3.2 Significant new infrastructure has been consented or is proposed in close proximity to the draft Order Limits, including, Bloy's Grove Solar Farm (49.9MW), Wacton Road BESS (228MW), FIELD Long Stratton BESS (400MW), Tasburgh Solar Farm (15MW), Stoke Holy Cross Solar Farm (70MW) and other NSIPs and TCPAs. This contributes to a cumulative intensification of energy infrastructure in the local area.	See the Applicants response to LIR-SNC-018 regarding the assessment of cumulative effects. Baseline evidence which provides information on land use is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**. The cumulative assessment included within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** considers a number of committed developments which have the potential to result in cumulative effects on Landscape and Visual receptors within the associated Study Area. The list has been formed by considering those committed developments which are located within the same identified published landscape character areas (considered within the LVIA), and / or that interact with visual receptors in relation to the Scheme within the Study Area, which include residents, recreational users of PRoW / long-distance routes, and road users. A number of short-listed committed developments which lie beyond the Study Area have been discounted, as these developments are not shown to have intervisibility with the Scheme based

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			on the ZTVs and / or are located in a different district landscape character area, and therefore unlikely to result in significant cumulative landscape and visual effects.
LIR-SNC-040	Landscape and Visual	6.4.1 The proposed route intersects several South Norfolk landscape character areas, including: • B1 Tas Tributary Farmland; • E2 Great Moulton Plateau Farmland; 6.4.2 These areas feature open agricultural landscapes, valley landforms and broad skyscapes that are particularly susceptible to visual intrusion from industrial energy infrastructure. 6.4.3 The district hosts an extensive network of PRoW's and users of these are generally of high susceptibility because of their attention directed towards the landscape and experiences of the routes. Visual assessments should therefore address both representative views and the sequential experience of walking or riding through and between development parcels.	The Applicant notes the Councils comment. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices provide a detailed overview of the landscape and visual baseline**.** Baseline landscape evidence is detailed in **ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119]**. The Applicant considers **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]** provides detailed reporting and transparency in how professional judgments have informed the overall effects reported for each phase of the Scheme which consider effects on the key characteristics of the district LCA. The visual assessment within **ES Volume ,: Appendix 7.7 – Visual Assessment Tables [APP-147]** considers visual effects arising from visual receptors including the PRoW network as a result of the Scheme. Furthermore, the PRoW Visual Amenity Assessment is included in **ES Volume 3**, **Appendix 7.9 - Public Right of Way Visual Amenity**

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		6.4.4 The change from an open route to one flanked by arrays, fencing, and dense mitigation planting is not merely a change in visibility; it changes scale, enclosure, light, perceived safety, tranquillity, and the relationship with the wider countryside. These effects may arise even where the development itself is partially screened from view.	**Assessment [APP-149]**. The assessment relates to the effects on users of recreational resources within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. In response to the ExA Q1.11.4 the Applicant has submitted a sequential route assessment of commonly used circular and combined routes which connect to the local settlements and are used by the local population at Deadline 2 to aid understanding of effects on these.
LIR-SNC-041	Ecology and Biodiversity	6.5.1 The district hosts a range of sensitive ecological assets, including numerous ancient woodlands, veteran trees, hedgerows, watercourses, lowland fens, and grassland habitats. These features create a mosaic of valuable ecological habitats that are potentially vulnerable to hydrological disturbance, vegetation loss and other construction-related impacts.	The likely effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. The potential impacts on trees, hedgerows and woodlands are assessed in **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]**, with mitigation measures set out in the **Outline CEMP [REP1-058]**. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design

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			principles, design buffers and design evolution, as set out in the **Design Approach Document** [**APP-212**]. Where impacts cannot be avoided then appropriate mitigation measures have been proposed with these to be secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064]** and **Outline Protected Species Mitigation Strategy [REP1-050]**.
LIR-SNC-042	Socio-Economics	6.6.1 Tourism, leisure, and heritage contribute to the district's economy, with attractions such as the Waveney Valley, Boudicca Way, museums, churches and extensive public footpaths drawing visitors each year. Construction-phase disruption and long-term changes in landscape character may influence visitor behaviour and local business performance. 6.6.2 The district is also shaped by ongoing housing and employment growth, reflected in numerous major planning applications. These developments contribute to economic vitality but also increase sensitivity to additional cumulative construction	Regarding impacts on local tourism, the Applicant refers to the response provided to LIR-SNC-038.

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		impacts associated with proposed sites for solar panels, BESS, project substations, and National Grid substation	
LIR-SNC-043	Landscape and Visual	6.6.2 The local context forms the baseline for the detailed topic-based assessments presented in Section 7.	The Applicant notes this comment.
LIR-SNC-044	Cultural Heritage	7.1.1 Government Guidance on good design for NSIPs states that design principles should respond positively to the four elements – climate, people, place and value. 7.1.2 Under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give special regard to preserving listed buildings and their settings as well as conservation areas. HE6 of the National Planning Policy Framework (NPPF) requires that substantial weight be given to the asset's conservation, irrespective of whether any potential effect amounts to positive effect, harm, substantial harm, or total loss of significance. While the harm identified is not substantial, it nevertheless should carry considerable	The Applicant is in agreement with the cited sections of 'Design principles, parameters and codes' within *Nationally Significant Infrastructure Projects: Advice on Good Design* (PI 2024; updated 2026), the *Planning (Listed Buildings and Conservation Areas) Act 1990*, the *National Planning Policy Framework* (NPPF) (MHCLG 2026), and 'Policy DM4.10 Heritage Assets' within the *South Norfolk Local Plan. Development Management Policies Document* (SNDC 2015). Please refer to the **Policies Compliance Document [REP1-076]** and **Planning Statement [REP1-074],** updated at Deadline 1 to reflect the NPPF published in August 2026. The Design Approach Document [APP-212] sets out how good design has been integrated into the

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		importance and weight in the decision-making process, as required by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Accordingly, the Council considers that any identified harm to the significance of heritage assets, including harm arising through changes to setting, should be given considerable importance and weight when undertaking the overall planning balance. 7.1.3 Policy DM4.10 of the South Norfolk Development Management Plan is also of relevance however, where there are any inconsistencies and areas of conflict with the more recent revised NPPF (2026), greater weight should be afforded to the latter.	Scheme in line with national guidance, and how good design outcomes have been secured.
LIR-SNC-045	Cultural Heritage	7.1.4 Beyond their immediate settings the identified designated heritage assets are situated within a much wider but still very localised historic environment described in the South Norfolk and High Suffolk Claylands National Character Area with five sub areas affected. These have been carried through to character	The Applicant acknowledges the sensitivity of the South Norfolk Claylands landscape, which contribute to the area's distinctive rural character. These characteristics, together with the landscape pattern and the relationship of the Scheme to the surrounding landscape, have been considered within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**.

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		assessments that have been adopted as part of the South Norfolk Design Code (2026). Common character attributes of the areas include small village settlements and hamlets with more isolated scattered farm buildings and labourers' cottages. Within the wider setting and context, it is the relationship between these historic buildings within their surrounding agricultural landscape as well as the historic connections through trackways and footpaths that will be impacted upon and affect how the character of the local area is experienced. 7.1.5 The areas affected are largely characterised by layers of historic rural landscape and agricultural development including ancient and more modern managed woodland, established hedgerows and trees, and a network of historic trackways and paths between settlements and dwellings. As identified in the descriptions of heritage assets many dwellings are closely associated with their wider rural surroundings, both through the dwellings being built for and lived in by people who worked the fields and managed the surrounding rural	The Applicant agrees that **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** identifies 1 Scheduled Monument and 46 Listed Buildings, but notes that the assessment identifies 4 Conservation Areas (Fritton, Brooke and Kirstead, Saxlingham Green and Saxlingham Nethergate).

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		landscape or being constructed from local natural materials drawn from the surrounding landscapes with localised vernacular design character. 7.1.6 Within the study area, the Environmental Statement identifies: • 1 Scheduled Monument; • 46 listed buildings; • 3 conservation areas; • Open, rural settings and long views strongly contribute to the significance of many of these assets.	
LIR-SNC-046	Cultural Heritage	7.1.7 Construction activity, including temporary access routes, vegetation removal and compound installation, will introduce noise, movement and visual disruption. This is likely to erode the rural setting of heritage assets close to the Order Limits. It is also noted that alterations are required to landscaping within the settlement of Saxlingham Nethergate for the commissioning phase and transport movements. Some of this landscaping is associated with the grade II* Saxlingham Rectory by Sir	The Applicant notes that effects from vibration from traffic were scoped out of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. However, an assessment of construction noise and vibration for receptors up to a distance of 100m is presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, with an assessment of effects of heritage assets, including listed buildings, also provided in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. These documents note that environmental changes during the Construction Phase of the Scheme, particularly noise

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		John Soane, which is of high significance. 7.1.8 With such a high-status house, the landscaping at the entrance point would be part of the designed setting. Damage or harm to the landscaping within the conservation area and to the front by heavy vehicles navigating a rural village road would likely result in a loss of significance although this is likely to be temporary until the landscaping is reestablished.	and vibration, are not expected to be any more than negligible. Construction vehicle routing has been developed in consultation with NCC 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 [REP1-068]**. Mitigation measures to control noise and vibration during construction are set out within the **Outline CEMP [REP1-058]**. The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in **Part 3 of the Transport Assessment, ES Volume 3, Appendix 11.1 [APP-176] pages 58-60.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed response on this issue in Q1.8.3 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]**.

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LIR-SNC-047	Cultural Heritage	7.1.9 It is agreed that there are no direct impacts to designated heritage assets, however the proposals will have an indirect impact on various designated heritage assets through changes to their setting which affects how the settings contribute to the overall significance of the heritage assets and which can be considered harmful.	The Applicant agrees that there will be no direct impacts to designated heritage assets. The Applicant disagrees that there will be indirect impacts upon various designated heritage assets through changes to their setting. In **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and its appendix **ES Volume 3, Appendix 10-1 – Heritage Statement [APP-165 – APP-168]** identify only one such designated heritage asset, the Grade II Listed Moulton Farmhouse (NHLE 1373270). These assessments conclude that the Scheme will result in a minor adverse impact upon the significance of this asset, which equates 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).
LIR-SNC-048	Cultural Heritage	7.1.10 It is agreed that there will not be any substantial harm, however in some cases the harm has been identified as being moderate adverse and significant. The Council has set out in its relevant representation where it considers there to be a higher degree of harm than that identified in the EIA and which should be taken into consideration and given considerable importance and weight in the planning balance.	The Applicant notes that low adverse impact is defined as: • Slight loss of the significance of a heritage asset. This could include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance (e.g. the demolition of later extensions/additions of little intrinsic value). • Some harm to the heritage asset's setting, but not to a degree that it would materially compromise the significance of the heritage asset.

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			• Perceivable level of harm, but insubstantial relative to the overall interest of the heritage asset. Medium adverse impact is defined as: • Partial loss or alteration of the significance of a heritage asset. Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This equates to less than substantial harm in terms of the NPSs EN-1 and EN-3 and a 'low level of harm' in NPPF (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 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**

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			[APP-046] and **ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 – APP-168].**
LIR-SNC-049	Cultural Heritage	7.1.11 The introduction of solar panels, associated substations, and fencing over a substantial area of countryside will introduce an industrial and alien character to a wide area of countryside. This will result in a harmful impact to the rural and agricultural character of the local area and the sense of place that has evolved over time and that is also contributed to by the heritage assets that are situated within it.	The Applicant acknowledges that the introduction of energy infrastructure would result in a change in land use. These effects have been transparently assessed and reported within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, including the identification of significant effects where appropriate. However, the Applicant does not agree that the presence of energy generation and transmission infrastructure necessarily equates to the creation of an industrial landscape. While the Scheme would introduce solar infrastructure into a predominantly agricultural landscape, it would not result in the industrialisation of the countryside. The Site would remain largely undeveloped in character, with the vast majority of land retained as open grassland and available for continued agricultural management, including grazing. Unlike conventional industrial development, the solar arrays are low in height, non-permanent, and do not involve extensive built form, large buildings, or significant areas of hardstanding. The assessment of landscape and visual effects has considered the existing landscape character and the extent to which the Scheme would alter it.

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			The Applicant further acknowledges the concern over cultural heritage effects as a result of the Scheme. **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** presents an assessment of direct and indirect impacts to the setting of heritage assets, which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**, as well as historic landscape and below-ground archaeological remains, which 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].**
LIR-SNC-050	Cultural Heritage	7.1.12 The countryside is experienced through a network of footpaths and trackways, many of which are long established and can be considered part of the historic environment, and which link designated historic assets, in many cases giving public access and contributing to views of historic assets within their wider setting and how they are experienced.	The Applicant has addressed comments regarding footpaths and trackways in LIR-SNC-005.

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LIR-SNC-051	Cultural Heritage	7.1.13 The applicant has considered and proposed ways in which the impact of the proposals on the setting of designated heritage assets can be mitigated through setbacks from listed buildings and conservation areas, removal of panels from areas closely associated with heritage assets and where views would be affected, and landscape planting to screen views to and from assets and the solar panels.	The Applicant agrees with the SNDC that mitigation measures incorporated into the Scheme's design do include setbacks, removal of Solar PV Panels, and landscape planting.
LIR-SNC-052	Cultural Heritage	7.1.14 As set out in the relevant representation, these measures do not entirely remove harm, or in some cases where landscape planting as screening is proposed, result in harm through removing views and the ability to appreciate assets within their wider settings. This includes how they contribute to the wider character of the local environment, including views from public footpaths and bridleways used by local people for recreation and to move between isolated dwellings and villages.	**ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices, consider the landscape and visual matters associated with the Scheme including the effectiveness of deciduous planting, both with regard to the time required to establish and reduced screening during the winter months. The Applicant considers that this embedded mitigation has been appropriately reflected in the assessment of effects. Mitigation planting is itself a component of the Scheme and has been assessed as such. Whilst it may alter openness, enclosure, landscape pattern and the composition of views the identifiable change is not automatically an adverse effect of the same scale as the infrastructure it mitigates. Where the planting reinforces characteristic landscape features, responds to published landscape

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			objectives and reduces the prominence, contrast and perceived influence of energy infrastructure, the overall magnitude of effect can reasonably reduce effects. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the **Outline LEMP** **[REP1-064]** have been carefully sited with regard to existing characteristic landscape features. Furthermore, embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation, alongside the incorporation of landscape proposals. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The **Outline LEMP [REP1-064]** includes details on planting proposals for each landscape typology including planting densities and outline management regimes. 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 [REP1-014]**.
LIR-SNC-053	Cultural Heritage	7.1.15 The ability to experience the countryside including the heritage assets within it is important, including	The Applicant acknowledges that the experience of the countryside, including its historic environment, contributes to health and wellbeing through

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		for the health and well-being of the people who live in the area or use the local area for recreation and attach great importance to a sense of place. This will be adversely affected by seeing overly prominent fields of solar panels due to the extent, coverage and size of the panels being visually dominant within their surroundings. As well as introducing features which are alien and of incongruous character, enclosing areas and changing existing views will also have an adverse impact including how the historic attributes which contribute to the sense of place are experienced.	landscape character, visual amenity, recreation, connection to nature and sense of place. The Human Health Summary Statement within **ES Volume 1, Chapter 18: Other Environmental Matters [APP-054]** recognises that changes to landscape and views can affect how people experience their surroundings, particularly nearby residents and users of Public Rights of Way and recreational routes (see section 18.6.111). The **Equality Impact Assessment [APP-214]** similarly recognises that changes in views, landscape character, neighbourhood character and attachment to place may affect some individuals differently, particularly those who rely on the local countryside and outdoor spaces for recreation, wellbeing and connection to the local environment (see sections 7.3.17 to 7.3.19 and section 7.4.5). The Applicant acknowledges that, in some locations, the presence of solar infrastructure, security fencing and associated development may alter existing views and the way the landscape is experienced (see sections 18.6.115 and 18.6.124 of Human Health Summary Statement). However, both assessments identify embedded mitigation, including landscape buffers, screening, reinforcement of existing field boundaries, new planting and long-term landscape management, to reduce visual effects and support the integration of the Scheme into the surrounding

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			landscape over time (see sections 18.6.115 to 18.6.119 of the Human Health Summary Statement and Table 8.2: Operational Phase: Changes in views and landscape character). The Human Health Summary Statement concludes that, whilst landscape character and visual amenity represent pathways through which wellbeing effects could occur, landscape mitigation would reduce effects over time, with most communities, PRoW users and recreational receptors experiencing minor or negligible effects by Year 15. Overall, the Scheme is not anticipated to result in significant adverse long-term effects on human health (see sections 18.6.123 to 18.6.124). The Equality Impact Assessment similarly concludes that, notwithstanding potential changes to views and landscape character in some locations, significant negative equality impacts are unlikely at a population level (see Table 8.2: Operational Phase: Changes in views and landscape character). A detailed landscape and visual assessment is reported **in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Further, a visual amenity assessment of **Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149]** and on residential properties in **ES Volume 3, Appendix 7.8 [APP-148].**

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LIR-SNC-054	Cultural Heritage Landscape and Visual	7.1.16 NPS EN-3 2.10.63 states "Applicants should set out a range of options based on different panel numbers, types and layouts with and without storage." The proposals should also be sensitive to the wider historic environment characteristics of the area and the contribution that the various heritage assets make to this character so as to ensure more sensitive design solutions can be achieved. This is especially important in terms of the relationship of heritage assets to the historic routes and trackways which are now footpaths and bridleways or their situation within, and contribution to, the wider historic landscape character and environment. It is considered by the Council that the Applicant has failed to demonstrate a range of options as required.	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility sought by the Applicant is described in **ES Volume 1, Chapter 4 - The Scheme [REP1-022]**. It is important to note that the exact design details of the Scheme cannot be confirmed until consent is granted and the detailed design has been completed. The local planning authorities would be required to approve the detailed design in advance of works commencing, should development consent be granted. The detailed design must be approved by the relevant planning authority pursuant to the requirements in the **Draft DCO [REP1-014]** and must be in accordance with the **Works Plan [REP1-005 and REP1-006]** and the **Design Principles, Parameters, and Commitments [REP1-078]**. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the Secretary of State, the Scheme has adopted the Rochdale Envelope approach, which involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has

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			therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme. The Scheme would utilise either Single-Axis Tracker Panels (Option A) and/or Fixed Panels (Option B). For the purposes of the EIA, technical topics have assessed either Option A or Option B dependent on which option assumes a worst-case scenario. The iterative evolution of the design in response to heritage sensitivities is set out in the **Design Approach Document [APP-212]**, which describes the progressive refinement of panel locations, extents and layouts across all three design stages. The Applicant confirms that further details will be at the detailed design stage in accordance with the parameters and commitments secured through Requirement 5 of Schedule 2 to the **Draft DCO [REP1-014]**.
LIR-SNC-055	Cultural Heritage Landscape and Visual	7.1.17 The proposals seek flexibility with maximum design parameters to apply across the scheme including the height of solar panels to be 4.5m tilting panels. This is sought to apply across all areas whether or not they are within the setting of designated heritage assets (both listed building and	See the Applicants response to LIR-SNC-054 regarding the Rochdale Envelope approach.

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		conservation areas). The Council is concerned that the assessment of effects has been undertaken on the basis of parameters which permit materially different outcomes at detailed design stage. The ExA should therefore satisfy itself that the reasonable worst case has been properly assessed and that any mitigation relied upon in the assessment is capable of being secured through the DCO.	
LIR-SNC-056	Cultural Heritage Landscape and Visual	7.1.18 Lower height panels would be closer in height to historic hedgerows (typically 3m for example) and therefore lower height panels should be a consideration within the design parameters where they are in more sensitive locations. Setting parameters for lower height panels in certain locations at least should be part of a package of measures to reduce the overall level of impact and resulting harm though better preserving the setting of heritage assets rather than relying solely on landscape mitigation which can in itself be harmful. Areas where lower panels would be more appropriate should be identified on a parameters plan, at least where this	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 The Scheme [REP1-022]** as a worst case. Option B Fixed South facing PV arrays have not been assessed. Option B Fixed South facing PV arrays have a reduced height at 3.5m and could reduce the theoretical envelope in which visual effects could occur, however it is considered that at 3.5m high Option B would still be visible above managed hedgerows within the landscape. Furthermore, in considering the worst-case scenario the assessment of the Option A: Single-Axis Tracker Panels has considered these at maximum tilt and the maximum height at 4.5m. However, during the midday period (and hours either side) when the sun is

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		would be the preferable option in terms of design flexibility so that it can inform reserved matters at a later stage of approval.	at its highest in the sky, the Option A arrays would be horizontal (to maximise their solar gain) and at a reduced height, therefore the scale and visual complexity of the solar arrays would be reduced from that reported. This reduced height would also occur during the hours of darkness. The introduction of solar development into the views represents a visual change and the Applicant considers the degree of difference between Option A and Option B is limited. The Applicant considers the limitation of an Option B scenario would not reduce the reported effects set out within the **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices.
LIR-SNC-057	Landscape and Visual Cumulative and In-Combination Impacts	7.1.19 Cumulative impacts arise from the interaction between the proposed solar panel sites, BESS, and substations with other major energy and grid-related developments, including solar farms, BESS schemes and substations. Combined, these effects intensify the perceived industrialisation of the rural landscape and affects the sense of place and character of the area in which these heritage assets are experienced within.	Technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** which includes all components of the Scheme. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation.

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LIR-SNC-058	Landscape and Visual	7.1.20 SNDC would welcome more comprehensive mitigation proposals that seek to result in the lowest level of impact achievable through appropriate design measures such as lowering solar panels heights or omitting some areas of panels to maintain views and historic connections between historic routes and historic building and settlements, and also looking for opportunities for landscape planting to be consistent with historic landscape planting so that it does in itself not appear incongruous but contributes positively and enhances landscape character, including those elements which are historic. The Council notes that even where harm falls below the threshold of substantial harm (as set out in the application documents), such harm should nevertheless be afforded considerable importance and weight in the planning balance. Accordingly, the Council considers that any identified harm to the significance of heritage assets, whether arising from direct effects or changes to setting, should be given considerable importance and	The Applicants notes the Councils comment. The Applicant considers that environmental matters have been a key consideration throughout the design evolution and the siting of infrastructure has been defined through a detailed constraints led exercise to minimise adverse effects. The developed **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Measures proposed 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 provide visual screening. The Applicant considers the proposed mitigation also performs legitimate landscape, ecological and green infrastructure functions. It supports the restoration and reinforcement of historic hedgerows, strengthens habitat connections through the farmed landscape, creates native woodland and field-edge habitats, and responds to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy.

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		weight when undertaking the overall planning balance.	
LIR-SNC-059	Landscape and Visual	7.2.1 Relevant policies include GNLP Policy 3 and SNLP DM4.5, DM4.8 and DM4.9, which collectively require protection of landscape character, trees and hedgerows and the integration of development into the landscape. These policies are broadly consistent with the revised NPPF whereby Landscape character protection remains aligned but should be applied proportionately and with recognition that landscapes can accommodate appropriately designed change. South Norfolk District Council also recently adopted in February 2026 the Landscape Susceptibility SPD, included in Appendix B, in relation to renewable energy and electricity transmission projects which is a material planning consideration. 7.2.2 NPPF Policy N2 requires proposals to consider landscape character and the natural beauty of the countryside, conserve and enhance valued natural features where possible, and use appropriate landscaping to	The Applicant note GNLP and SNLP Policies. The Applicant considered the protection of landscape character, trees and hedgerow and the integration of the Scheme into the landscape. A detailed landscape and visual assessment is included in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. 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 [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristic features. The proposed mitigation performs legitimate landscape, ecological and green infrastructure functions. It supports the restoration and reinforcement of hedgerows, strengthens habitat connections through the farmed landscape, creates native woodland and field-edge habitats, and

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		integrate development. Policy TR8 also requires development to protect and enhance the PRoW network and to take opportunities to improve route quality and countryside access. The design policies require a context-led response and safe, inclusive public space and movement routes.	responds to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through a Requirement in the **Draft DCO [REP1-014]**. With reference to the Landscape Susceptibility SPD, please see the Applicants response to LIR-SNC-035.
LIR-SNC-060	Landscape and Visual	7.2.3 The route crosses several sensitive landscape character areas, including: • Tas Tributary Farmland (B1); • Great Moulton Plateau Farmland (E2); These areas are characterised by open views, skyline prominence and rural tranquillity.	The Applicant notes the character of the Landscape Character Area, full description the landscape baseline is presented in [APP-119].
LIR-SNC-061	Landscape and Visual	7.2.4 Although viewpoint locations were agreed with the Landscape Officer, the submitted set does not adequately illustrate all reasonable worst-case effects. More viewpoints should have been located where PRoWs pass through or directly alongside arrays,	The Applicant undertook considerable consultation with the Authority in establishing and agreeing an appropriate number and range of view locations to inform the LVIA and associated appendices. The selection was intended to provide a representative range to cover receptor experiences and viewing circumstances across the study area, rather than

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		particularly where development would occur on both sides. Notable omissions include WA- FP43 and Via Beata north of Site 2C and School Road/Boudicca Way at Site 5. This reduces confidence in conclusions about route-based and residual effects.	sampling every section of individual PRoWs. The Applicant therefore considers that the existing view location set provides sufficient information to assess route-based and residual visual effects and the Applicant does not agree that the view location coverage is insufficient to assess reasonable worst-case effects on route-based receptors. For Site 2, **VL2/Site 2** is located at the junction of **Wacton FP43 and RB31**, directly capturing views experienced by users of FP43 and representing the northern section of the route adjacent to the proposed arrays. In addition, views from the **Via Beata Way** are represented by both **VL2/CRC** and **CL1/Site 2**, which assess views from the recreational route in the vicinity of Site 2 and the Cable Route Corridor. These view locations were selected to provide representative coverage of the route rather than duplicating similar viewing experiences along its length. Moreover, views of Sub-Site 2C are captured from the west of the Site which is not screened by an existing hedgerow with tree north of the Site, therefore presenting the worst case. With regard to Site 5, the assessment includes a number of view locations to the south of the site, including **VL5/Site 5**, **VL6/Site 5** and **VL7/Site 5**, which are representative of views experienced from the direction of **School Road/Boudicca Way**. Collectively, these view locations assess the

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			relationship between the Scheme and receptors travelling along this part of the route / network, including locations where the development would be experienced in close proximity.
LIR-SNC-062	Landscape and Visual	7.2.5 The visualisations are understood to be Type 3 rather than Type 4. Type 3 material can assist assessment, but it is not adequate on its own where the judgement depends on precise relationships between the route, maximum panel height, proposed planting and topography. There is therefore a risk that the visual effects are greater than portrayed.	Please refer to response LIR-SNC-010.
LIR-SNC-063	Landscape and Visual	7.2.6 At VL1/Site 9, there appears to be a conflict between AVR2 and AVR3: the panel height does not appear consistent with the maximum parameter block and proposed woodland may be shown on the wrong side of the PRoW. It is also unclear whether the relevant AVR images show the 4.5 m maximum PV height. The applicant should provide a schedule for every visualisation confirming the modelled panel height.	The Applicant's visualisations and maximum parameters shown align with Table 4.1 in **ES Volume 1, Chapter 4 The Scheme [REP1-022]** as a worst case. These include parameters as follow: • Solar: 4.5 m • BESS: 4.5 m • Nat Grid Sub: 15 m • 400 kV Sub: 13 m • 132 kV Sub: 7 m

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			In accordance with **ES Volume 3, Appendix 7.1 Landscape and Visual Methodology [APP-118**] the photorealistic outputs are based on the illustrative concept layouts and provide an illustrative representation the Schemes appearance. The solar arrays shown are illustrative as ultimately they could be built anywhere within the maximum parameter which accords with Work No 1 which is represented by a single-coloured outline. The proposed mitigation as shown on the **Green Infrastructure Strategy [REP1-013]** includes hedgerow tree planting to reinforce the existing feature at this location. The existing PRoW is located to the west of the existing hedge, and the proposals are accurately shown.
LIR-SNC-064	Landscape and Visual	7.2.7 The Council consider that the provided visualisations are inadequate in assessing the full impact of the project and propose the below additional points for further investigation and evidence to be submitted as part of the examination: • BESS VL2, VL3, and VL4: Photo sheets and visualisations; • The 4-metre acoustic barrier at the BESS has not been	**Volume 3, Appendix 7.5 Photosheets - BESS [APP-123]** has been updated at Deadline 2 to include the highlighted missing view location photos. Visualisations have not been included for these locations. The 4m acoustic barrier has been considered as part of the maximum development parameters for the BESS. The landscape mitigation presented in the **Green Infrastructure Strategy [REP1-013]** has taken account of the required offsets associated with the realigned pylon line.

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		adequately included in the LVIA assessment or visual material; • The interaction between the realigned pylon line (Works 5), required tree-free easement, and proposed screening at Site 1B is unclear; • The purpose and landscape effects of CRC 6 are unclear now that Site 6 is retained in agricultural use; • The Environmental Measured ID references on the Green Infrastructure Strategy Plans are not clearly explained in the OLEMP; • The AIA description of 'partial removal' does not quantify the length, area, or proportion removed from each affected tree group and hedgerow.	CRC6 connects Site 5 to Site 3 and then to the southern portion of Site 7. The landscape effects resulting from CRC 6 are presented in the **Landscape Assessment Tables [APP-120].** The Environmental Measure ID is included to reference individual mitigation measures and provide reasoning for the measures inclusion. They are not specifically included within the Outline LEMP. The Applicant is committed to undertaking a further pre construction survey and Arboricultural Method Statement in advance of the construction works. The Applicant will submit the final AIA, Arboricultural Method Statement, Tree Protection Plans and hedgerow impact schedules to the relevant local authority arboricultural officer and affected parish Tree Wardens for approval. The **Outline CEMP [REP1-058]** states (Table 3.2): • 'A pre-construction tree survey will be undertaken prior to construction in accordance with BS 5837:2012 (or in line East Pye Solar The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties EXAM/8.8 Planning Inspectorate Reference: EN0110014 1271 ID Theme Representation Applicant's Response construction-ready, tree-by-tree and hedgerow by-hedgerow

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			assessment of all works, all access routes, all visibility splays, all AIL routes, all compounds, all haul roads and all root protection incursions. with most recent adopted standard and industry guidelines). This survey will inform the tree protection zones to be applied during construction; • An Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works; • All tree work operations will be carried out in accordance with BS3998:2010 'Recommendations for Tree Work'; current arboricultural industry guidelines and best practice; and all relevant Health & Safety standards.'
LIR-SNC-065	Landscape and Visual	7.2.8 Construction compounds, access tracks, vegetation removal and the movement of large machinery will introduce temporary but notable landscape disruption along the route.	The temporary landscape effect during construction, construction effects are assessed in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].**
LIR-SNC-066	Landscape and Visual	7.2.9 Mitigation that screens solar panels may also block long views and	The Applicant notes the potential loss of longer-distance views as a result of the proposed landscape

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		should not be credited as restoring baseline visual amenity. At Year 15, the infrastructure may become less visible, but the open rural outlook will remain lost. 7.2.10 Both 3 m and 4.5 m arrays would be large and potentially overwhelming when experienced at close range by walkers. The benefit of a 3 m limit is most material in middle- and longer-distance views: a lower array can be more effectively filtered by existing and proposed hedgerows, including in winter, and is less likely to project above boundary vegetation or appear on higher ground.	mitigation measures. Mitigation planting is itself a component of the Scheme and has been assessed as such. It may alter openness, enclosure, landscape pattern and the composition of views. However, an identifiable change is not automatically an adverse effect of the same scale as the infrastructure it mitigates. Where the planting reinforces characteristic landscape features, responds to published landscape objectives and reduces the prominence, contrast and perceived influence of energy infrastructure, the overall magnitude of effect can reasonably reduce effects. The Applicant considers the landscape in which the Scheme is located has varying degrees of visual openness. Landscape and visual matters have been a key consideration throughout the design evolution and the **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. Measures proposed 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 provide visual screening. Where proposed mitigation could result in an adverse effect these have been acknowledged in **ES Volume**

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			1, Chapter 7 - Landscape and Visual [APP-043] and its associated appendices. The Applicant notes the preference of 3m panels by the Council. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices**,** consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 The Scheme [REP1-022**] as a worst case only. Option B Fixed South facing PV arrays have a reduced height at 3.5m and could reduce the theoretical envelope in which visual effects could occur, albeit this reduced height is still taller than the typical height of field bounding hedgerow and would therefore still remain visible above these features. The assessment has been undertaken on a robust worst-case basis using a maximum solar array height of 4.5 m within the Zone of Theoretical Visibility (ZTV) modelling and visual assessment. This assessment confirms that visibility is generally concentrated within the short to medium distance from the Sites, with field boundary vegetation, woodland blocks and the generally flat topography substantially restricting views and limiting significant visual effects beyond the defined study area. The Applicant considers that, at close range, where arrays are visible, the difference in perceived visual effect between a 3 m and 4.5 m array would not

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			necessarily alter the significance of effects, as the development would remain apparent within the view. The Design Principles, Parameters and Commitments [REP1-078] sets out a minimum offset distance of 15 metres between Scheme elements and Public Rights of Way (PRoW), helping to maintain separation between development infrastructure and recreational users.
LIR-SNC-067	Landscape and Visual	7.2.11 The planting strategy should respond to local pattern rather than apply continuous linear tree belts as a generic screen. New belts can appear artificial, obstruct long views and increase enclosure. Hedgerows with occasional trees should generally be used where they reflect field boundaries. Where a more substantial screen is justified and adequate land is available, small woodland or coppice blocks with irregular, organic edges are more likely to integrate with local character than uniform strips. Planting should filter and integrate the development without unnecessarily enclosing routes or fields that contain no development.	The Applicant discussed the **Green Infrastructure Strategy [REP1-013]** and the design approach with the Council prior to the Application being made, and is open to continued discussion through the process, these facilitated by the SOCG process. The Applicant agrees that mitigation planting should be informed by local landscape character and existing vegetation patterns. The **Green Infrastructure Strategy [REP1-013]** has sought to reinforce characteristic field boundary features through the retention and enhancement of existing hedgerows, supplemented by hedgerow tree planting where appropriate, rather than relying solely on continuous screening belts. Where more substantial mitigation is required, woodland planting has been designed to respond to local field pattern and reflect the established pattern of shelterbelts, plantations and woodland blocks within the local landscape. In addition to its landscape function, woodland planting has been proposed to improve habitat connectivity

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			and deliver biodiversity benefits, thereby responding positively to both landscape character and relevant environmental policy objectives. Linear tree belts have been included at a number of limited locations to aid visual screening and often connect to existing features thus improving habitat connectivity and structural diversity of habitats across the landscape.
LIR-SNC-068	Landscape and Visual	7.2.12 As set out in the Outline Landscape and Ecological Management Plan (OLEMP), a 75% or 80% planting establishment target is too low where planting is relied upon to provide necessary screening or filtering. A minimum 90% successful establishment threshold should be secured, with timely replacement and an outcome-based obligation to achieve the intended density, height and continuity.	The Applicant notes that establishment success is influenced by a range of factors including species selection, landscape character objectives, seasonal conditions and site-specific constraints. A blanket 90% survival requirement would not necessarily represent good practice across all habitat types and planting proposals. Instead, the Applicant considers that the appropriate measure of success is whether the approved mitigation delivers its intended landscape and visual function through appropriate management, monitoring and replacement of failures where required. The Applicant however welcomes the opportunity to discuss this further with the Authority.
LIR-SNC-069	Landscape and Visual	7.2.13 Furthermore, maintaining hedgerows at 3.5m would not reliably screen panels permitted up to 4.5m. This reinforces the need for a 3m panel height limit in the identified fields and for the hedge specification to match the claimed visual outcome. Management	Please refer to LIR-SNC-066.

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		of these should retain selected views and avoid continuous high hedges or tree belts beside PRoWs where these would create a tunnel effect. Route safety, seasonal light and perceived enclosure should form part of detailed landscape approval.	
LIR-SNC-070	Landscape and Visual	7.2.14 The Council notes that the South Norfolk Landscape Susceptibility in Relation to Energy Generation, Storage and Transmission SPD does not impose an automatic prohibition on development. Rather, it is a design and assessment tool intended to inform the siting, layout and design of energy infrastructure. Applied to the East Pye Solar Project, the SPD supports an approach which seeks to utilise lower and more enclosed fields, avoid arrays on higher and route-sensitive land, minimise panel heights where practicable, and ensure that substations and BESS infrastructure are sited and designed to reduce their prominence. The SPD also supports the use of locally characteristic landscape treatments, including hedgerows, hedgerow trees and organically shaped woodland blocks, whilst avoiding	With reference to the Landscape Susceptibility SPD, please see the Applicants response to LIR-SNC-035. The Applicant agrees that the South Norfolk Landscape Susceptibility in Relation to Energy Generation, Storage and Transmission SPD is intended as a landscape planning and design tool rather than a policy-based prohibition on development. The Applicant considers that the Scheme reflects many of the principles advocated by the SPD. The SPD identifies openness, opportunities for long and framed views, and variations in the sense of enclosure as relevant characteristics when considering landscape susceptibility. The Applicant has sought to ensure that mitigation responds to existing landscape characteristics, and that the layout responds to the characteristics of the receiving landscape, through the commitments to retain and protect existing hedgerows, hedgerow trees, tree belts and woodland features.

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		mitigation that unnecessarily blocks long-distance views, increases enclosure or creates tunnel effects along public rights of way.	
LIR-SNC-071	Landscape and Visual	7.2.15 The conclusion that cable route corridors (CRCs) would have no residual landscape or visual effects depends on successful reinstatement. The DCO and OLEMP should confirm whether the same planting type and alignment can be restored over each CRC, identify any restrictions on deep-rooting vegetation, and secure an alternative locally appropriate solution where exact reinstatement is not possible.	The Applicant notes this comment. Temporary vegetation removals (hedgerows) associated with the Cable Route Corridors (CRCs) are limited in extent and will be reinstated following completion of cable installation. The **Outline LEMP [REP1-064]** confirms that temporary hedgerow removals along CRCs will be replanted/reinstated once installation is complete, with the detailed approach to reinstatement secured through the final LEMP required under Requirement 7 of the **Draft DCO [REP1-014].** The detailed LEMP will identify the location, species, planting specifications, implementation programme, management and monitoring requirements for reinstated landscape features. Where hedgerow or other vegetation is temporarily affected by CRC works, reinstatement will seek to restore the landscape character and function of the affected feature using locally appropriate species and planting mixes, having regard to existing vegetation and site-specific constraints.
LIR-SNC-072	Landscape and Visual	7.2.16 The proposed scheme forms part of a wider cluster of energy infrastructure within the South Norfolk district with connections along the	The Applicant notes the Council's comments regarding cumulative landscape and visual effects. A cumulative assessment has been undertaken as part of the **ES Volume 1, Chapter 7 - Landscape and**

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	Cumulative and In-Combination Effects	overhead line routes from Norwich Main. When combined, these developments result in substantial cumulative landscape change and industrialisation of a rural setting. The significant adverse effects identified for East Pye would remain and, in relation to Landscape Character Areas B1 and E2, the perceived increase in human and infrastructural influence would be reinforced by the wider concentration of energy development. 7.2.17 The Council also considers that cumulative effects should be assessed by reference to the different pathways through which such effects may arise. In particular, distinction should be made between operational cumulative effects arising from the long-term presence of multiple energy infrastructure projects within the landscape, construction cumulative effects arising from overlapping construction programmes and associated disruption, and the cumulative experience of users of the public rights of way network where multiple schemes may be experienced sequentially across a wider area. Such distinctions assist in understanding the	**Visual [APP-043]** and its associated appendices and considers the interaction of the Scheme with other relevant existing, consented and reasonably foreseeable developments in accordance with established assessment guidance. This assessment identifies significant cumulative landscape and visual effects where these are predicted to occur and acknowledges that the Scheme would contribute to cumulative change within the wider landscape. The Applicant has developed the **Green Infrastructure Strategy [REP1-013]** which identifies a range of proposed landscape measures including reinforcing existing features. Once established these measures will provide visual screening of the Scheme elements, and aid integration of the Scheme into the landscape. Whilst no landscape mitigation measures are proposed to respond to cumulative effects reducing visibility of the Scheme through measures shown on the **Green Infrastructure Strategy [REP1-013]** would support reduction in perception of human and infrastructural influence across the landscape. In addition the cumulative schemes also include a range of landscape mitigation measures to reduce their own adverse effects which would have a similar effect in reducing overall perception.

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		full extent of cumulative effects on landscape character, visual amenity and the experience of the countryside.	
LIR-SNC-073	Landscape and Visual	7.2.18 Residual adverse effects on landscape character and visual amenity are expected to remain significant, even after mitigation. The Council's concern is not limited to the visual visibility of infrastructure. Rather, it extends to the fundamental change in the character, appreciation and experiential qualities of the affected landscape, including changes to openness, tranquillity, enclosure, long-distance views and the way in which the countryside is experienced by residents and users of the public rights of way network.	The Applicant acknowledges the Council's position that significant residual effects on landscape character and visual amenity remain following mitigation. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices recognises that the assessment of landscape effects extends beyond the visibility of Scheme infrastructure and considers effects on landscape character, perceptual qualities and the way in which the landscape is experienced. This includes consideration of changes to characteristics such as openness, tranquillity, enclosure, landscape pattern, views and the experience of users of the Public Rights of Way network and other recreational receptors.
LIR-SNC-074	Noise and Vibration	7.3.1 Key policies include SNLP DM3.13 (amenity, noise and quality of life) and DM3.14 (pollution, health and safety). These policies are relatively consistent with the revised NPPF in respect of protecting residential amenity however, assessments of harms and mitigation have a degree of change in the NPPF. As such, Policies P2 and P3	The Applicant acknowledges that the August 2026 NPPF has restructured and, in some respects, clarified the national decision-making policies concerning living conditions and pollution. However, the Applicant does not consider that it materially changes the established policy approach to the assessment of noise. Policy P3 continues to require adverse noise effects to be mitigated and reduced to a minimum, significant observed adverse effects to be

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		of the NPPF (2026) are of relevance when assessing pollution and amenity.	avoided, and the character of tranquil areas to be maintained. The reference to Policy P2 in this context appears to be misplaced, as Policy P2 relates to ground conditions. Policy P3 is the principal national decision-making policy relevant to noise and residential living conditions. For this nationally significant infrastructure project, the relevant National Policy Statements remain the primary policy framework, with the NPPF considered where important and relevant. The **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]** were updated at Deadline 1 to reflect compliance with the NPPF published in August 2026.
LIR-SNC-075	Noise and Vibration	7.3.2 The district includes many quiet rural areas with low ambient noise levels. The absence of evening background noise monitoring in the ES makes it difficult to quantify impacts accurately. In considering the nature of the rural locations for the proposal sites, these are often dark and naturally lit during the day, offering dark skies at night for residential enjoyment and wildlife.	The Applicant acknowledges that parts of the Scheme are situated in quiet rural sound environments. This context has been expressly considered in the assessment. The claim that evening background sound monitoring is absent is not accurate. The environmental sound surveys included continuous measurements covering the evening period. These measured data have been analysed in the **Evening Noise Assessment [REP1-101]** to derive representative background sound levels for the period from 19:00 to 23:00.

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			The Evening Noise Assessment considers operational noise from the BESS, Project Substations, National Grid Substation and Solar PV infrastructure, together with potential effects in external residential amenity spaces. It concludes that the assessment of the evening period does not identify additional significant effects and does not alter the conclusions or mitigation set out in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. With regard to the comment on dark skies, no permanent operational lighting is proposed within the Solar PV Sites. Motion-sensing security lighting is proposed within the 132kV Substations, 400kV Substations, National Grid Substation and BESS Compound only, to maintain safe working conditions in winter months, for security purposes and for maintenance activities. Temporary construction lighting will be used during the construction phase, with mobile lighting towers (8 kVa) deployed for safe working. Key commitments include: • Directional fittings with hoods/cowls to minimise outward light spill and glare (angled greater than 20° from horizontal) • Lighting directed towards the middle of the Order Limits rather than towards the boundaries

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			• CCTV utilises night-vision technology to avoid the need for night-time lighting of the Solar PV Site
LIR-SNC-076	Noise and Vibration	7.3.3 The ES relies on percussive piling for the installation of the solar panels without geotechnical justification. This method generates substantial noise and vibration.	The Applicant refers to its response to LIR-SNC-014.
LIR-SNC-077	Noise and Vibration	7.3.4 In the absence of sufficient information regarding the National Grid Substation and assessment of evening time background noise levels, the operational impacts arising from the BESS, National Grid Substation, and all Project Substations may have a detrimental noise effect on amenity given the quiet and tranquil rural location of the Project.	The operational assessment uses representative plant sound power data obtained from example manufacturers and potential suppliers, as set out in Table 12-21 of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** and Table 3.14 of **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**. The assessment adopts conservative operating assumptions, including simultaneous and continuous operation of the modelled plant at maximum output, subject to the period-specific BESS fan-duty assumptions identified in the assessment. Conservative propagation assumptions have also been applied. The final plant selection and layout will be required to comply with the operational noise limits secured through the **Outline OEMP [REP1-060]**.
LIR-SNC-078	Lighting	7.3.5 The ES classifies all the proposal sites as E2 following the GN01/26 Avoidance of Obtrusive Light guidance however, given the isolated and rural	The recommendation for the lighting design to adopt the criteria associated with an E1 ELZ is acknowledged.

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		nature of the district, a significant portion of the site could be classified as E1. As such, lighting schemes should be designed as worst case scenario in E1 and should use 2,700K lights to protect the dark skies for amenity and ecological conservation rather than 3,000K lighting.	**ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151]** currently specifies a CCT of 3,000K or less, which allows 2,700K lighting to be adopted in more sensitive locations. It is considered appropriate to retain this flexibility, as certain construction and operational activities may require 3,000K lighting to provide greater visual clarity for safe working. Any such lighting would nevertheless be subject to the measures set out in the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]** to minimise potential effects on external receptors and the night sky.
LIR-SNC-079	Noise and Vibration	7.3.6 Given incomplete assessments and uncertainties around piling methods and operational noise generated by components of the Project, on the basis of the information currently available, the Council cannot conclude that the development complies with SNLP noise and pollution policies nor the NPPF (2026). Residual adverse impacts remain possible. 7.3.7 The Council therefore consider that further information is required to assess the Noise impacts of the Project and these were set out in the submitted Relevant Representation, attached in Appendix D.	The matters raised by the Council are addressed in the Applicant's responses to LIR-SNC-075 to LIR-SNC-077 above. In summary: LIR-SNC-075 addresses the baseline sound survey data and the subsequent assessment of the evening period in the **Evening Noise Assessment [REP1-101].** LIR-SNC-076 addresses the assessment of percussive piling as a reasonable worst-case installation method and the application of Best Practicable Means; and LIR-SNC-077 addresses operational noise from the BESS, Project Substations and National Grid Substation, together with the controls secured through the **Outline OEMP [REP1-060]**.

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			The Applicant therefore does not agree that the noise and vibration assessment remains incomplete. The assessment, supplementary information and secured mitigation provide sufficient information to assess the likely noise and vibration effects of the Scheme. Following application of the secured mitigation, the residual noise and vibration effects are not significant. A review of the Horizontal Directional Drilling (HDD) construction noise assessment has identified that the baseline sound data applied at CRC9, described as the dwelling north of Springwood, were taken from measurement position MP45. The baseline sound environment at CRC9 is more appropriately represented by measurement position MP14. MP14 is also used for residential receptors in the Springwood Lane area in **ES Volume 1, Chapter 12: Noise and Vibration [APP-048]**. The HDD calculations have therefore been reviewed using the MP14 baseline data. The calculated HDD construction sound level at CRC9 remains 48 dB LAeq,TLAeq,T, as the correction relates only to the baseline measurement position and does not alter the source assumptions, propagation calculation or receptor distance presented in the assessment. The original calculation used a daytime ambient sound level of 50 dB, whereas the appropriate daytime ambient sound level from MP14 is 43 dB LAeq,TLAeq,T.

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			During daytime HDD works, the calculated construction sound level of 48 dB LAeq,TLAeq,T is above the corrected ambient sound level of 43 dB but remains below the applicable SOAEL threshold of 65 dB. The corrected assessment therefore identifies a low magnitude of impact and a minor adverse effect, rather than the negligible impact and negligible effect previously reported. During night-time HDD works, the calculated construction sound level remains 48 dB LAeq,TLAeq. The original calculation used a night-time ambient sound level of 40 dB, whereas the appropriate night-time ambient sound level from MP14 is 41 dB LAeq,TLAeq,T On the basis of the Category A night-time threshold of 45 dB LAeq,TLAeq,T applied in the submitted assessment, the result remains above the SOAEL threshold and continues to represent a medium magnitude of impact and a moderate adverse effect. The correction therefore does not change the night-time assessment outcome at CRC9.
LIR-SNC-080	Ecology and Biodiversity	7.4.1 Relevant policies include EN3, NPPF (Policies CC1, F8, N2, N3, N6), GNLP Policy 3 and SNLP DM4.4, which require developers to safeguard	The Applicant notes this comment and confirms that the Scheme design is in adherence to relevant ecological policy and legislation.

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		ecological interests and deliver biodiversity enhancements. The applicant has committed to meeting Biodiversity Net Gain (BNG) obligations. The local plan policies are broadly consistent with the NPPF with respect to protection and enhancement of designated sites, biodiversity, and valued open spaces aligned. Statutory habitats and biodiversity duties operate in addition to policy protection.	Policy CC1 of the NPPF (August, 2026) is aimed at plan-making policies so has not been addressed directly. Policies F8, N2, and N6 have been addressed within the updated **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**. The Applicant notes the relevance of Policy N3, the **Green Infrastructure Strategy [REP1-013]** supports the Governments' legally binding target to increase the tree canopy through the provision of approximately 25ha of new tree planting (in addition to hedgerow tree improvements). The landscape and ecological management of the Scheme and proposed landscape measures including tree planting during construction and operation of the Scheme is set out in the **Outline LEMP [REP1-064]**. Therefore, the Applicant considers that the Scheme is in compliance with the relevant national and local policies.
LIR-SNC-081	Ecology and Biodiversity	7.4.2 Natural England (NSIP Relevant Representations Template) have agreed with the conclusions of the Shadow Habitats Regulations Assessment [APP-7.25] – subject to securing measures there will be no significant adverse effect. SNDC defers to Natural England with regards to potential impacts on internationally designated sites.	The Applicant notes this comment.

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LIR-SNC-082	Ecology and Biodiversity	7.4.3 The proposal potentially affects 2 CWS located within the order limits and 5 CWS located immediately adjacent to the order limits. The CRC will be constructed beneath Fritton Grange Meadows CWS and Lower Spring Wood CWS (and adjacent to ancient hedge H52) via Horizontal Directional Drilling (HDD).	Please note the Applicant's response at LIR-SNC-083 below.
LIR-SNC-083	Ecology and Biodiversity	7.4.4 SNDC does not currently agree with the ES with regard to construction impacts. The reasons for designating the CWS should be considered by the Applicant on a site-by-site basis (with copies of the citations provided for examination), so that the proposal can demonstrate that all potential impact pathways have been considered.	The Applicant notes these comments, and the matter will remain under discussion and an updated citations will be provided within an updated **ES Volume 3, Ecological Desk Study and Extended Habitat Survey [APP-152]** at Deadline 3.
LIR-SNC-084	Ecology and Biodiversity	7.4.5 Four Roadside Nature Reserves (RNRs) are partially located within the limits, SNDC is concerned that RNRs are not specifically mentioned within the documents secured by the DCO and consideration has not been given to vehicles overrunning the RNRs which is a risk given the RNRs are located on single track roads. SNDC has	It is considered unlikely that existing RNR's will be impacted by 'overrunning'. The existing single-lane roads are regularly used by large agricultural vehicles with no avoidance measures currently in place, therefore, any damage associated with overrunning will have impacted and shaped road verges in line with the current baseline. However, the Applicant acknowledges these comments, and the matter will remain under discussion and an updated RNR's

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		requested that further consideration is given to the potential impacts on RNRs and any unidentified RNRs.	locations will be provided within an updated **ES Volume 3, Ecological Desk Study and Extended Habitat Survey [APP-152]** at Deadline 3.
LIR-SNC-085	Ecology and Biodiversity	7.4.6 Lowland Fen is present within the Fritton Meadows CWS and SNDC notes that an additional assessment is being undertaken by the Applicant regarding the potential for thermal effects on the lowland fen during operation which may affect this conclusion. SNDC defer to the Environment Agency in this matter.	The Applicant notes this comment, and the matter will remain under discussion with the EA.
LIR-SNC-086	Ecology and Biodiversity	7.4.6 SNDC have several concerns about the arboricultural impact of this scheme including on potentially unidentified ancient woodland and veteran trees. There remains potential to impact irreplaceable habitat which will not be resolved until the detailed design stage. The AIA also fails to identify the location of all trees within the order limits so the scale of potential impacts on trees has not been adequately considered. SNDC has also requested that notable trees/overmature trees are treated as veterans as they will likely become	All recorded ancient woodlands in the DEFRA 'Magic map' and veteran trees in the Ancient Tree Inventory, including additional trees found in surveys, have been identified in the **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]**. The Applicant acknowledges SNDC request on the notable trees/overmature trees, and the AIA will be updated at deadline 3 to apply veteran tree buffer zones for these notable trees. The Applicant will review whether all trees have been surveyed within the Order Limits in the pre-construction tree survey and provide a detailed arboricultural impact assessment prior to construction

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		future veterans given the 60-year lifespan of the proposed development.	as outlined in Table 3.2 in the **Outline CEMP [REP1-058]**.
LIR-SNC-087	Ecology and Biodiversity	7.4.8 The proposal will deliver at least 44.22% biodiversity net gain in habitat units, a minimum of 34.71% biodiversity net gain in hedgerow units and a minimum of 17.52% biodiversity net gain in watercourse. SNDC is seeking to secure these gains within the DCO as these will have a signifying benefit for biodiversity in the area. SNDC is however concerned that at the end of the scheme's lifespan these habitats will be returned to arable use. SNDC considers that this potential loss will have a significant negative impact on a host of species including bats, badgers, newts and birds. SNDC is keen to avoid this and is seeking commitment to retain habitats where possible. The Council therefore seeks assurance that the biodiversity gains relied upon in the assessment are adequately secured through the DCO and are not capable of falling materially below those presented within the application.	The Scheme will deliver Biodiversity Net Gain greater than 10% as presented in the **Biodiversity Net Gain Report [APP-218]** and supported by the **Biodiversity Net Gain Statutory Metric [APP-219]**. This is secured through Requirement 9 of the **Draft DCO [REP1-014]**. 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 [REP1-013]** (as secured within **the Outline LEMP [REP1-064]**), the Scheme will deliver BNG in excess of 10% BNG. The minimum % BNG the Applicant has committed to for each unit type is the following: • +30% Habitat Units • +25% Hedgerow Units • +10% Watercourse Units

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			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, a lower percentage has been included in the Draft DCO in order to retain design flexibility and account for any adjustments as a result of detailed design, and also to account for any potential future changes to either the published Statutory Metric or the application of BNG which may affect the figures at the detailed design stage. It is considered unlikely that the reversion of the Sites back to agricultural practices would result in an extensive loss of existing or created habitats of ecological importance. Such habitats are primarily associated with field margins and the existing farmland landscape, such as hedgerows, rivers, lowland deciduous woodland, ponds; there are no plans to remove such features. Following from 60 years of favourable management, these habitats would be in an ecologically favourable condition compared to the baseline. Any works to remove habitats as part of the decommissioning of the Scheme or by the landowner following decommissioning would need to comply with the legislative requirements that apply to such habitation at that point in time.
LIR-SNC-088	Ecology and Biodiversity	7.2.9 The baseline surveys identified the presence of important species	The likely effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and**

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		including barbastelle bats, badgers (and larger mammals) and skylarks. The proposal could have negative impacts on the movement and foraging of these species, and on setts and nesting (skylark)	**Biodiversity [APP-044]** which concludes no significant construction and decommissioning effects, and moderate (local-scale) beneficial effects during the operational phase upon these ecological receptors together with mitigation/avoidance measures provided within the **Outline Protected Species Mitigation Strategy [APP-161REP1-050]**.. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document** [**APP-212**]. Where impacts cannot be avoided then appropriate mitigation measures have been proposed with these to be secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064]** and **Outline Protected Species Mitigation Strategy [REP1-050]**.
LIR-SNC-089	Cumulative and In-Combination Effects	7.5.1 The cumulative impact of this project with other NSIPs, solar farms, BESS schemes and grid reinforcements is a major concern. South Norfolk is hosting a substantial concentration of large-scale infrastructure.	See the Applicant's response to LIR-SNC-018.

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		7.5.2 A strategic approach to the implementation of the energy infrastructure projects in the area would align with strategic planning and would avoid piecemeal harm. However, in the absence of any such measures, the cumulative burden on South Norfolk is inconsistent with sustainable development and should not be underestimated.	
LIR-SNC-090	Landscape and Visual Cumulative and In-Combination Effects	7.5.3 Multiple solar PV sites, project substations, National Grid substation, and BESS alongside many other energy schemes will create a heavily industrialised rural environment and significantly alter the experiences and sense of place in the setting of heritage assets.	This comment has been addressed within LIR-SNC-018 and LIR-SNC-057.
LIR-SNC-091	Ecology and Biodiversity Cumulative and In-Combination Effects	7.5.4 Multiple projects increase pressure on habitats, hydrological systems and species, with overlapping works creating a risk of incremental degradation.	The Applicant is aware of other projects in the region. The **ES [APP-042** to **APP-054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The assessment in **ES Volume 1, Chapter 9 – Water Environment [APP-045]** concludes that with the incorporation of embedded mitigation for flood risk, surface water runoff and pollution management, the

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			impacts are 'Not Significant', with the exception of the cessation of agricultural use/fertiliser use which is 'Significant Major Beneficial'. The assessment in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** concludes that the Scheme will not result in a cumulative effect on those receptors which have been identified within the chapter.
LIR-SNC-092	Socio-Economics Cumulative and In-Combination Effects	7.5.5 Extended construction periods and overlapping project timelines will exacerbate disruption to residents, road networks and local businesses.	The Applicant has assessed the reasonable worst case and cumulative effects through the assessment presented in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and supported by the **Transport Assessment [APP-174-177], Outline Construction Traffic Management Plan [REP1-068], Outline PRoWPPMP [APP-203]** and **Outline Operational Traffic Management Plan [APP-202].** Together they set out the assessment methodology and the management and mitigation measures for the Scheme.
LIR-SNC-093	Socio-Economics	7.6.1 The Council recognises the essential national role of generating renewable energy including solar and the need to reinforce the National Grid with an additional substation. However, localised harms are substantive. 7.6.2 The district's tourism offer i.e. market towns, historic churches,	Regarding impacts on local tourism, the Applicant refers to the response provided to LIR-SNC-038. In addition, with regard to landscape character the Applicant acknowledges that the Scheme would introduce a change to the character of the host fields and in part the wider district landscape character areas during its construction and operational lifetime. These are assessed and presented as significant

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		Waveney Valley, Boudicca Way, museums and walking routes may experience reduced visitor appeal due to landscape and construction impacts. 7.6.3 Disruption during construction and changes to landscape character could affect hospitality, retail and cultural sectors. The Council also notes that despite hosting extensive infrastructure, there is no direct local benefit. The widespread nature and scale of residual harms gives rise to the potential for in combination effects, including through the adverse consequences of any proposed mitigation (e.g. effects of landscape mitigation on the setting of heritage assets as raised in sections 8.1 and 8.2 above). In order to assist the Examining Authority, the Council has prepared the below site-specific recommendations to reduce the level of harm for the project.	effect within the **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices. However, when assessing the magnitude of change, the geographical extent of change is considered, and this is in the context of the Sites being within a small part of the much broader landscape character areas. The host fields form only discrete parts of the wider landscape, as presented in **ES Volume 2, Figure 7.2 Landscape Character Plan [APP-067]** therefore, the Applicant considers the Scheme would not result in the loss or alteration of the defining characteristics across those broader geographies as a whole.
LIR-SNC-094	Site Specific Considerations – Site 1 (7.7.1)	a) Limit PV to 3m in the field east of GM-FP18. The existing hedgerow would not provide meaningful filtering of a 4.5m array, particularly in winter.	The Applicant considers the hedgerow along PRoWGM-FP18 to be intact and with trees and therefore able to provide filtering of views from the west including the PRoW. With reference to the PRoW given the height of the hedgerow the Applicant considers the reduction in height from the fixed

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			panels (Option B) of 1m would not result in a betterment of the assessed effect. The Applicant also highlights that in considering the worst-case scenario the assessment considers the Option A: Single-Axis Tracker Panels at full tilt and the maximum height of these at 4.5m. However, during the midday period (and hours either side) when the sun is at its highest in the sky, the Option A PV arrays would be horizontal (to maximise their solar gain) and at a reduced height, therefore the scale and visual complexity of the solar arrays would be reduced from that reported. This is also the case during hours of darkness.
LIR-SNC-095		b) Provide at least a 10m offset from GM-FP18, where panels would otherwise closely adjoin the route without planting mitigation.	In accordance with the **Design Principles, Parameters and Commitments [REP1-078],** a 15m offset from the PRoW is provided to the solar parameter.
LIR-SNC-096		c) Remove the field west of the National Grid Substation to preserve an open rural outlook to the west of GM-FP18/Narrowgate Way and GM-FP14. Consider removal of Site 1A as the clearest means of retaining the outlook from the memorial bench at the GM FP18/GM-FP14 junction.	Sub – Site 1A represents only a limited geographical area and for users of Narrowgate Way (GM-FP18) only a small percentage of the wider route in which recreational users' traverse would be directly affected. The Applicant acknowledge that users of GM-FP14 would be directly affected between Frith Way and Broadgate Lane, albeit the development parameters offset has been increased for users west of Narrowgate Way. The Applicant does not consider

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			removal of Sub-Site 1A would reduce the perception of the Scheme in the wider landscape.
LIR-SNC-097		d) Limit PV to 3m in the northern field of Site 1B to mitigate impact on the views from VL4 Site1.	VL4 Site 1 is located to the east of Site 1 and experiences filtered views of the Sites. The Applicant considers reducing the height of the panels would not reduce the adverse effects reported from this receptor. Please also see the Applicants response to LIR-SNC-094.
LIR-SNC-098		e) The rural context of GM-FP14 would be substantially lost through the combined effect of panels, the substation and enclosing planting.	The Applicant notes the effects resulting from the Scheme on this receptor, which has been accounted for in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices.
LIR-SNC-099		f) The LVIA appropriately identifies a significant effect at local VL2/Site1, but the effect at VP4/Site1 should also be significant because of the introduction of industrial/energy detracting features.	A significant effect is concluded for VL4 Site 1, however this reduces overtime with the implementation of mitigation measures as shown on the **Green Infrastructure Strategy [REP1-013]** which include tree planting within and adjacent to existing field hedgerows and help filter visibility of the Scheme and integrate the Scheme into its context.
LIR-SNC-100		g) Effects on GM-FP14, GM-FP19 and GM-FP18 should not be shown as materially diminishing at Year 15 merely because planting establishes. No additional planting is proposed along GM-FP18, so its close-range effect would remain. Along GM-FP19, the tree	As represented by VL2 Site 1 users of GM-FP14 and GM-RB18 would experience significant effects throughout all stages of the Scheme due to the proximity and visual influence of the Scheme on these routes. The Applicant considers visual effects reduce over time as the proposed mitigation establishes and increases the perceived separation of

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		belt would itself create enclosure, reduce glimpses into the countryside and make the route darker, particularly in winter.	the infrastructure from the receptor through increased filtering of views. However, it is acknowledged that the visual change will be more notable for users of GM-FP14 / GM-FP13 / GM-FP15 who currently traverse through relatively open fields with limited intervening features adjacent to the route. For users of GM-RB18 a well-established hedgerow is already present on the eastern side of the route between the route and Sub-Site1B. Where this feature is less robust an additional hedgerow with trees has been proposed. Users of GM-RB19 as represented by VL1 and VL2 BESS are already heavily filtered by existing vegetation along either side of Hundred Lane and overtime as the proposed linear tree belts establish adjacent to the existing vegetation views of the Scheme will become further restricted.
LIR-SNC-101		h) Clarify how the pylon-line easement, within which tree planting may be restricted, affects the deliverability of screening at Site 1B.	The proposed overhead line would pass across Frith Way south of the proposed linear tree belt (S1b-3) as shown on the **Green Infrastructure Strategy [REP1-013]**. As a result, it would cross the proposed hedgerow with trees (S1b-6) located along Frith Way. As part of the detail design the exact overhead line location and associated easement would be confirmed, and trees will be excluded from the proposed hedgerow for this section.

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LIR-SNC-102	Site Specific Considerations – BESS and National Grid Substation Site (7.7.2)	a) Provide the missing photo sheets and visualisations for VLs 2, 3 and 4.	**ES Volume 3, Appendix 7.5 Photosheets - BESS [APP-123]** has been updated at Deadline 2 to include the highlighted missing view location photos. Visualisations have not been included for these locations.
LIR-SNC-103		b) Assess the potential 4m acoustic barrier as part of the reasonable worst case. From TSM-FP3 and GM-FP19 it would be an overtly urban feature, visible in winter through planting, increasing enclosure and diminishing tranquillity.	Work No 2 includes for the provision of acoustic barriers to support noise attenuation the BESS. This will be delivered in accordance with the established parameters and not exceed the maximum height parameter of 4m for this work area. The exact requirements and locations are to be determined during detail design and secured by Requirement5 of the **Draft DCO [REP1-014]. ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices consider the introduction of built form as part of Work No 2 with a maximum height of 4m and this considers the provision for noise barriers in this area.
LIR-SNC-104		c) The proposed linear tree belt may obscure lower BESS and substation elements but is not characteristic of the local landscape and would itself have an adverse effect on local character.	The **Green Infrastructure Strategy [REP1-013]** identifies a range of proposed landscape measures including reinforcing existing features through new tree belt planting to the northeast and south of the BESS Site and extension to the woodland to the west. Once established these measures will provide visual screening of the Scheme elements at this location, and aid integration of the Scheme into the landscape. These measures would reinforce woodland belt features already present in the locality

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			and should therefore not be regarded simply as introducing an uncharacteristic new landscape feature. The Applicant considers the proposed mitigation also performs legitimate landscape, ecological and green infrastructure functions. It supports and strengthens habitat connections and biodiversity gains, through the farmed landscape, creates native woodland and field-edge habitats, and responds to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy.
LIR-SNC-105		d) The tree belt would not wholly screen structures up to 13m high. An urban and infrastructural influence would remain at Year 15.	In accordance with the **Design Principles Parameters and Commitments [REP1-078]** Work No 3A includes for a maximum height up to 13m to the top of the busbars. However other apparatus is lower with buildings limited to 4.2m, therefore not all elements within the work area will be built to this maximum parameter. Nevertheless, in taking a worst-case approach **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices acknowledge that in the year 15 scenario the proposed substation would be visible in a worst case above the proposed mitigation measures. In accordance with the Applicant's Project Level Design Principles the substation has been located adjacent to existing vegetation to aid integration.
LIR-SNC-106		e) The local residual effect should remain significant and adverse because	The Applicant considers the landscape in which the Scheme is located has varying degrees of visual

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		the loss of openness and rural context is not reversed by screening.	openness. Landscape and visual matters have been a key consideration throughout the design evolution, and the **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristics. As set out in LIR-SNC-104 the introduction of these features into this landscape are not incohesive with existing features and wider perceptions of openness would be retained.
LIR-SNC-107		f) The PRoW assessment should not treat the effect on TSM-FP3 as materially diminishing at Year 15 where the route experience changes permanently from open to enclosed.	The PRoW is located on the western boundary of the adjacent agricultural field outside of the Order Limits. The Scheme includes the introduction of a new linear tree belt within the Order Limits to the west of the PRoW, and on the opposing side of an existing hedgerow which is currently gappy in its form. The Introduction of trees will only affect the western portion of the available view and views in this direction are already intermittently obscured by the existing hedgerow, with further features including a woodland belt to the west and trees along Hundred Lane to the north affecting perceived openness in these directions. The Applicant considers the provision of further trees adjacent to the existing hedgerow will help reduce visibility of the Scheme for receptors using this route thus reducing the perception of the Scheme in the longer term and leading to a reduced visual effect. Views to the east will be preserved with open views maintained.

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LIR-SNC-108	Site Specific Considerations – Site 2 (7.7.3)	a) Add assessment viewpoints on WA-FP43 and Via Beata north of Site 2C; their omission leaves an important gap in the evidence.	Please see the Applicants response to LIR-SNC-061
LIR-SNC-109		b) Replace uniform tree belts around Sites 2B and 2C with hedgerows and hedgerow trees, or locally appropriate woodland/coppice blocks where adequate space exists.	Proposed linear tree belts within Site 2 would be planted in random formation, to support natural colonisation, resulting in a varied and locally appropriate landscape framework rather than a uniform belt of vegetation. It will also provide a form which integrates with the local vegetation structure. Planting will consist of a range of pioneer, successional and long-lived tree species. The detailed design of landscape mitigation will be refined through the final Landscape and Ecology Management Plan and detailed landscape proposals. The Applicant will continue to consider opportunities to vary planting structure through the detailed design process and discuss these with SNC through consultation.
LIR-SNC-110		c) Identify significant adverse visual effects at VPLs 2 and 4 as a result of increased enclosure and loss of rural vistas.	VL2 and VL4 Site 2 are representative of users of Wa-RB31 with VL4 adjacent to the Scheme and VL4 within the wider landscape and not immediately adjacent to the Scheme. The existing view from VL2 is influenced by intervening vegetation and tree features which already restrict visibility towards the Site. With the proposed mitigation measures as shown on the

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			Green Infrastructure Strategy [REP1-013], the Applicant considers the visibility of the Scheme will be further reduced and effects would represent only a small-scale change to the south and east with wider views to the north and west preserved. The existing view from VL4 is located between two fields on a track which is abutted by hedgerows and hedgerows with trees which are relatively well defined and create a sense of enclosure for users of the route. The introduction of linear tree belt will reinforce this vegetative structure and reduce visibility of the Scheme and whilst considered as a visual change is not incompatible with existing visual characteristics, this representing only a small change in the year 15 scenario.
LIR-SNC-111		d) Limit panels to 3m in Sites 2A and 2B to reduce effects on TSM-RB6, TSM-BR9, TSM FP8, TSM-BR7 and motorists on the A140.	Please see the Applicants response to LIR-SNC-056.
LIR-SNC-112		e) Treat the effect on TSM-FP8/VL6a as significant and adverse at Year 15: no planting mitigation is proposed, and the array would remain visible to the north along the route.	As noted in the Relevant Representations this omission has been rectified at Deadline 1 and the **Green Infrastructure Strategy [REP1-013]** updated to include a proposed hedgerow with trees along with southern boundary of Sub-Site 2A. This would reduce visibility of the Scheme in accordance with the assessment conclusions.

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LIR-SNC-113		f) Do not assume that the effects on WA-RB31, TSM-RB6 and TSM-BR9 materially diminish at Year 15 where planting replaces open views with enclosure.	The Applicant does not agree that the reduction in effects at Year 15 should be discounted on the basis that mitigation planting introduces a greater sense of enclosure. The purpose of the proposed landscape mitigation is not solely to screen views but also to facilitate the long-term integration of the Scheme within the existing landscape structure through reinforcement of hedgerows, tree planting and woodland creation. These measures would reinforce existing characteristic features present in the locality and should therefore not be regarded simply as introducing an uncharacteristic new landscape feature. The Applicant considers the proposed mitigation also performs legitimate landscape, ecological and green infrastructure functions. It supports and strengthens habitat connections and biodiversity gains, through the farmed landscape, creates native woodland and field-edge habitats, and responds to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy. While planting may alter the character of some views and introduce additional enclosure, this does not necessarily result in effects remaining unchanged or becoming more adverse.
LIR-SNC-114		g) Assess WA-FP43 and TSM-BR7; both are likely to experience significant adverse effects from the change in open/undeveloped rural setting. PM-FP6 is omitted but is unlikely to	WA-FP43 is represented by VL2/Site 2, and TSM-BR7 is represented by VL8/Site 2. These two view locations are assessed as having a moderate adverse significant effect in Operational Year 1, reducing to a minor adverse, non-significant effect by

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		experience a significant effect along its full length; the effect would be concentrated near the site.	Year 15, as presented in **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147].** PM-FP6 is represented by VL5/Site 2 which is located adjacent to the A140. Here effects are assessed as having a major adverse significant effect in Operational Year 1, reducing to a negligible adverse as a result of the proposed native broadleaf woodland on the eastern boundary of Sub Site 2A which would result in screening or heavy filtering of views towards the solar PV arrays.
LIR-SNC-115	Site Specific Considerations – Site 3 (7.7.4)	a) The relatively limited PRoW network reduces the number of affected receptors, but the LVIA identifies a significant adverse effect at VL4/Site3 adjoining the site.	The Applicant acknowledges the significant effect identified at VL4/Site 3.
LIR-SNC-116		b) Replace the proposed tree belt along HP-FP28 with a more characteristic hedgerow and hedgerow trees, and limit PV to 3m so that this treatment can provide useful filtering.	The proposed tree belt along HP-FP28 (S3-5) has been designed not only as landscape mitigation but also to strengthen habitat connectivity between Spring Wood and habitats to the west, delivering ecological as well as landscape benefits. The tree belt reflects the integrated landscape and ecological design approach for the Scheme. Furthermore, views northwards from HP-FP28 will remain open, ensuring that the defining characteristics of the local landscape are retained. Please also see the Applicants response to LIR-SNC-094 with regard to heights of panels.

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LIR-SNC-117		c) Remove the PV area west of HP-FP25 to preserve an open outlook on one side of the footpath and avoid compromising its entire setting.	The Applicant confirms that the field west of HP-FP25 is retained for agricultural use.
LIR-SNC-118		d) Treat effects on HP-FP25 and HP-FP28 as major and adverse at Year 15 at the local route scale. Screening panels do not reinstate the lost open rural visual amenity.	The Applicant disagrees that the effects on HP-FP25 and HP-FP28 would be major adverse at Year 15. The Scheme would alter views on only one side of these PRoWs, with the wider landscape context and views in the opposite direction remaining available to users. Whilst there would be changes to elements of the existing open rural visual amenity, the routes would continue to retain key characteristics of their rural setting, including open views beyond the Scheme boundaries. Furthermore, the proposed landscape mitigation would mature over time and reinforce existing characteristic features, helping to integrate the development into the surrounding landscape. The Applicant therefore considers that the residual effects at Year 15 would not be of a scale or magnitude sufficient to justify a major adverse effect rating.
LIR-SNC-119	Site Specific Considerations – Site 4 (7.7.5)	a) Clarify the function of the proposed community space and how it would be accessed; the current plan does not appear to show new public access.	The Applicant is keen to discuss provisions for this community space with the local community prior to confirming specific requirements as set out in the **Outline LEMP [REP1-064]**. It is considered public

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			access would be from the existing field access on Church Lane.
LIR-SNC-120		b) Limit PV to 3m in the southern fields of Site 4A and the southern field of Site 4B adjoining LS-FP3.	Please see the Applicants response to LIR-SNC-056.
LIR-SNC-121		c) In addition to effects already identified as significant, VLs 3 and 10/Site4 should be treated as significant because of the loss of rural vistas.	The Applicant does not agree that these receptors would experience significant effects. VL10 is identified as a medium scale change reducing to small in the long term as a result of proposed mitigation. The receptor sensitivity is considered as low being representative of the strategic road, and therefore the overall effects in accordance with the LVIA methodology are not significant. VL3 is considered to represent a very small-scale change in the medium and long term due to the glimpsed nature of the views and small proportion of the existing view that is affected, and therefore the overall effects in accordance with the LVIA methodology are not significant.
LIR-SNC-122		d) Provide organic-shaped woodland planting south of Site 4B, along the northern boundary of the proposed community space, rather than a uniform/linear block, to reflect local character and filter views from the south.	Proposed woodland planting would be planted in random formation, to support natural colonisation, resulting in a varied and locally appropriate landscape framework rather than a uniform belt of vegetation. It will also provide a form which integrates with the local vegetation structure.

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			Planting will consist of a range of pioneer, successional and long-lived tree species. The detailed design of landscape mitigation will be refined through the final Landscape and Ecology Management Plan and detailed landscape proposals. The Applicant will continue to consider opportunities to vary planting structure at the detail design stage.
LIR-SNC-123		e) Effects on LS-FP3 and LS-FP4 should not be treated as materially diminishing solely because planting matures. Removing development east of the footpath would preserve an element of rural openness and would be an effective means of reducing harm.	Solar development has been removed to the east of LS-FP3, and the **Green Infrastructure Strategy [REP1-013]** identifies a range of proposed landscape measures along this route to its western side including reinforcing existing features. Once established these measures will provide visual screening of the Scheme elements at this location, and aid integration of the Scheme into the landscape.
LIR-SNC-124	Site Specific Considerations – Site 5 (7.7.6)	a) Add a representative view from School Road/Boudicca Way. The site visits confirmed visibility through gaps in the hedge and likely greater winter visibility.	School Road/Boudicca Way will have views towards the southern extent of Site 5. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and associated appendices assessed views to the south of the site, namely VL5/Site 5, VL6/Site 5 and VL7/Site 5. Collectively, these view locations are representative of the range of views experienced by receptors travelling along School Road/Boudicca Way and assess the relationship between the Scheme and users of this section of the local road and route

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			network, including locations where the development would be experienced in proximity.
LIR-SNC-125		b) At VL6/Site5, provide a continuous hedgerow or understorey component; trees within a hedgerow alone would not provide sufficient low-level filtering. Limit the relevant PV to 3m.	A continuous low-level vegetative screen would be provided by the proposed hedgerow improvements with additional tree planting also included. This approach is detailed in the **Outline LEMP [REP1-064]** paragraph 3.3.11.
LIR-SNC-126		c) Limit PV to 3m throughout Site 5A and in the eastern part of Site 5B to reduce effects on MO-FP5 and MO-RB4 and respond to the higher land in part of Site 5A. A 3m limit is also recommended beside The Street to retain more of the lane's rural context.	Please see the Applicants response to LIR-SNC-056.
LIR-SNC-127		d) Replace tree belts with hedgerows and hedgerow trees or use locally characteristic coppice/woodland of organic form in undeveloped parts of Site 5B.	The proposed measures on the **Green Infrastructure Strategy [REP1-013],** seek to balance retention of existing field patterns with introduction of new features to provide visual screening. The existing hedgerows in this location already exhibit qualities similar to a linear tree belt and it is considered the proposed measures would reinforce these existing features. The introduction of woodland copses within Sub-Site 5B would reduce the ability to introduce arable field margins and skylark mitigation which has equal value and importance within the environmental strategy. These measures would reinforce existing characteristic features present in the locality also perform legitimate landscape, ecological and green

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			infrastructure functions through strengthening habitat connections and biodiversity gains, within the farmed landscape. Measures respond to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy.
LIR-SNC-128		e) VLs 1, 4 and 6/Site5 should also be treated as significant adverse effects because the LVIA underplays the loss of rural openness.	VL1 and VL6 are located outside the Order Limits, and the presence of existing field bounding vegetation already restricts visibility across the landscape. The Applicant considers the addition of new features to supplement existing with preservation of wider views would not result in notable losses of openness and result in a significant effect. At VL4 the introduction of a hedgerow with hedgerow trees directly west of the PRoW, would reduce views to the west, however given the layering of existing features the Applicant does not consider this view to exhibit strong open characteristics. With the offset from the PRoW and introduction of a new hedgerow the Applicant considers the resulting view, and its component features are reflective of existing landscape features, and therefore whilst a change these do not result in a significant effect.
LIR-SNC-129		f) The effects on MO-FP11 and MO-FP5 should not be treated as materially diminishing at Year 15 where openness remains lost. No effect is expected on MO-FP9 because development has been removed from its parcel. MO-RB4	With reference to MO-FP11 and MO-FP5 please see the previous response at LIR-SNC-128 for VL4. Receptors using MO-FP9 are represented by VL5b Site 5, which concludes an effect due to visibility of

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		should be assessed; significant effects are likely over part, but not the whole, of the route.	the Scheme (which reduces following establishment of the mitigation). MO-RB4 is represented by VL1 and VL2 Site 5. VL2 which is immediately adjacent to the Order Limits concludes a significant effect prior to establishment of proposed mitigation which seeks to reinforce the existing characteristics features with hedgerow, scrub and woodland planting.
LIR-SNC-130	Site Specific Considerations – Site 6 (7.7.7)	a) Explain why CRC 6 is required when Site 6 is no longer proposed for solar development and is to remain agricultural.	The Applicant refers to response 24 in **Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-098]**
LIR-SNC-131		b) **REP1-064** indicates that CRC 6 requires removal of planting. If there is no associated development need, the hedgerow removal should be deleted from the scheme.	CRC 6 relates to the installation of the Cable Route and as such limited hedgerow loss is identified to facilitate installation, as shown on Figure 1 of the **Outline LEMP [REP1-064].** Once installed hedgerow loss associated with the cable route installation (and not required for operational access) will be replanted and restored.
LIR-SNC-132	Site Specific Considerations – Site 7 (7.7.8)	a) Remove development from the Site 7C field between HP-FP2 and HP-BR30/Pymar's Lane. It occupies high ground and is prominent from the north, including SN FP25/VP3. The PRoW assessment identifies a moderate adverse effect, which is significant	The Applicant notes the Councils comment. The Applicant's position is that it would not be consistent with the government's objectives to deliver a scheme which is smaller than that which has been assessed as acceptable on a planning basis.

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		under the applicant's stated terminology.	
LIR-SNC-133		b) Remove development from the southern fields of Site 7D, north (following field pattern) and south of SN-FP12, to avoid enclosing the footpath on both sides and losing its rural vista.	The Applicant notes the Councils comment. Whilst the Scheme would result in the addition of solar development to the north of the PRoW (which is proposed to be screened by a new hedgerow with trees), the Applicant has offset the solar development in accordance with the Project commitments by 15m. Views to the south (which are heavily filtered by the existing hedgerow) would typically exclude development. The Applicant will however discuss this request further with the Authority through the SoCG process.
LIR-SNC-134		c) Remove development from Site 7F east of SN-FP10 and north of SN-FP27 to retain an open rural outlook from both routes.	The Applicant notes the Councils comment. However, the removal of development from this portion of the Site represents a considerable loss to the generating capacity for the Scheme and it is also the location of the proposed Project Substation. Within Sub-Site 7F the Applicant has sought to exclude development where there are overlapping environmental constraints with the exclusion of development to the east accounting for the SSSI and Ancient Woodland and PRoW. This offset provides opportunity for a community space.
LIR-SNC-135		d) Limit PV to 3m in the northern field of Site 7D beside SN-FP13, the southern field of Site 7F affecting VL15/HP-FP3, Sites 7G and 7H affecting Bussey's	Please see the Applicants response to LIR-SNC-056.

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		Loke, Site 7K beside VL13, and Site 7A affecting Boudicca Way.	
LIR-SNC-136		e) Remove PV from the northern part of Site 7K to preserve the open rural context of SH FP21.	The Scheme only affects a relatively limited portion of SH-FP21 and where the route is affected the Scheme is offset from the route. At this location the Scheme proposes to reinforce the existing hedgerow along the boundary of the Order Limits (which already partially filters views to the south) and therefore the Applicant considers the overall effects to the rural views experienced by users of this route are limited.
LIR-SNC-137		f) The assessment of Boudicca Way is not sufficiently representative. It relies heavily on VL1/Site7 south of Site 7A, which itself results in a significant adverse effect at Year 15. The effect at VL8/Site7 should be higher than assessed and should remain significant and adverse because of the introduction of extensive human influence into a rural route experience.	**ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the visual amenity effect on the PRoW as a receptor including sequential effects, with affected length of PRoW and direction of travel considered where required. In addition, multiple View Locations including from the PRoW network have been assessed as detailed in **ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]**. This includes the following views from the Boudicca Way Site 7 VL1 VL2 and VL7, Site 8 VL1 and VL9, CRC VL3, VL10 and VL11. At VL8 Site 7 the Scheme is offset from the receptor by ~250m and the view is influenced by vegetation which surrounds the Green and therefore has reduced relationship with the surrounding agricultural landscape. An additional view (VL21 Site 7) was

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			added to the south to represent views with closer proximity to the Scheme. This concludes a significant effect, and highlights that with increasing distance from the Scheme adverse effects reduce
LIR-SNC-138		g) Do not assume effects on SN-FP10, SN-FP12, SN-FP13 and SN-FP27 materially diminish at Year 15. Enclosure and infrastructural influence would remain even where planting screens the panels.	The Applicant notes the response. Responses to these routes has been previously addressed at LIR-SNC-134 and LIR-SNC-135.
LIR-SNC-139		h) Site 7A occupies higher ground and is visually prominent. Its significant adverse effect at VL1/Site7 is particularly important because the receptor is on the long-distance Boudicca Way.	The Applicant notes the response.
LIR-SNC-140	Site Specific Considerations – Site 8 (7.7.9)	a) Delete proposed trees along Market Lane and north of SH-FP22 where there is no development in the field, so that existing open vistas are retained.	No trees are proposed along Market Lane. The trees to the north of SH-FP22 provide reinforcement of the hedgerow feature and provide screening of views from receptors to the north looking south.
LIR-SNC-141		b) Limit PV to 3m across Site 8A to enable hedgerows and trees to provide more effective filtering.	Please see the Applicants response to LIR-SNC-056.
LIR-SNC-142		c) Remove PV east of SH-FP19 to preserve open views on at least one side of the footpath. Remove PV from	The Applicant notes the response. Site 8 has undergone extensive reduction in the amount of solar development to respond to its environmental constraints. This includes removal of panel to the east

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		the elevated and visually prominent part of Site 8A.	of SH-FP19 due to flood constraints. The Applicant will however discuss this request further with the Authority through the SoCG process.
LIR-SNC-143		d) Treat the effects on SH-FP22 and SH-FP19 as remaining adverse at Year 15. The routes would become more enclosed, and this fundamental change is not removed by mature planting.	**ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the visual amenity effect on the PRoW as a receptor including sequential effects, with affected length of PRoW and direction of travel considered where required. The Applicant considers the visual change to represent a perceptible contrast, resulting in a partial change to the view, which in accordance with the methodology does not result in a significant effect.
LIR-SNC-144	Site Specific Considerations – Site 9 (7.7.10)	a) Development is generally better accommodated because the site is enclosed and the west side of BR-FP6 remains rural.	The Applicant notes this comment.
LIR-SNC-145		b) Delete the proposed hedgerow across the undeveloped field. It is unnecessary for screening and would introduce avoidable enclosure and loss of an open vista.	The introduction of this feature is to replace a previously removed feature which has been highlighted as a concern by local stakeholders.
LIR-SNC-146	Site Specific Considerations – Site 10 (7.7.11)	a) This site is comparatively better able to accommodate development because public access is more limited than at several other sites.	The Applicant notes this comment.

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LIR-SNC-147		b) Limit PV to 3m in Site 10A and the southern fields of Site 10B to reduce effects on Wash Lane.	Please see the Applicants response to LIR-SNC-056.
LIR-SNC-148		c) Do not assume the effect on Wash Lane materially diminishes at Year 15. The proposed planting would itself transform the lane into a more enclosed route.	Wash Lane is typically lined by vegetation on either side and the introduction of mitigation planting will reinforce this existing characteristic, and reduce visibility of the Scheme, thus reducing the degree of visual change.
LIR-SNC-149	Draft DCO	8.1.1 South Norfolk District Council has reviewed the Draft Development Consent Order (DCO) accompanying the East Pye Solar project and has identified several areas of concern relating to the clarity, enforceability and completeness of the proposed Requirements. These matters have been raised previously in the Council's Relevant Representation and Statement of Common Ground discussions are ongoing. 8.1.2 The Council recognises that a clear and comprehensive set of Requirements is essential to ensuring that the construction and operation of this nationally significant infrastructure project can be appropriately controlled and that residual impacts on local	The Applicant has responded to South Norfolk Council's Relevant Representation in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]** which includes responses regarding the requirements in the **Draft DCO [REP1-014]**. The Requirements are consistent with those contained in made DCOs for solar projects and are considered to be clear and enforceable. The details of the relevant mitigation measures and other commitments are set out in the outline management plans The Applicant looks forward to continuing to engage with South Norfolk Council on the Draft DCO throughout the examination process.

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		communities and the environment are minimised.	
LIR-SNC-150	Draft DCO	8.2.1 The Council notes that proposals for local government reorganisation affecting Norfolk have been subject to change and are currently on hold. While the Council does not consider local government reform to be an examination issue in itself, it considers it important that the Draft DCO is drafted in a manner which ensures that all Requirements remain clear, operable and enforceable throughout the lifetime of the development, notwithstanding any future changes to local government structures or administrative arrangements. 8.2.2 To ensure continuity, resilience and future-proofing, the Council advises that the DCO Requirements should clearly specify the Local Planning Authority (LPA) as the discharging authority for all conditions. This approach would ensure that, regardless of structural changes to local governance, the appropriate statutory body retains control over post-consent compliance mechanisms.	The Applicant notes the comments on local government reorganisation. The Applicant considers that the **Draft DCO [REP1-014]** submitted at Deadline 1 addresses South Norfolk Council's concern about unknown successors in function to itself in the Interpretation section of Schedule 2 (Requirements), where the relevant planning authority *"means South Norfolk Council or its successor in function as the relevant planning authority"*. This accounts for the scenario where even if there are future structural changes to local governance, the appropriate statutory body will be the relevant planning authority.

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LIR-SNC-151	Draft DCO	8.2.3 In addition, certain Requirements, particularly those relating to heritage, archaeology or environmental matters, should explicitly identify relevant statutory consultees (such as Historic England or the Historic Environment Service) to ensure that specialist advice is properly integrated into the discharge process.	The Applicant has incorporated consultation with relevant bodies throughout the requirements as it considers necessary. Regarding archaeology in particular, please refer to the Applicant's response in ID WR-HE-096 in **The Applicant's Response to Submissions Received at Deadline 1 - Statutory Bodies [EXAM/9.29]**.
LIR-SNC-152	Draft DCO	8.3.1 The Council considers that a number of provisions within the draft DCO require further scrutiny to ensure that environmental mitigation relied upon throughout the application is capable of being effectively secured and enforced. Particular consideration should be given to the adequacy of: • Requirement 5 (Detailed Design Approval) • Requirement 7 (Landscape and Ecology Management Plan) • Requirement 9 (Biodiversity Net Gain)	Requirements 5, 7, 9, 13 and 21 ensure that the relevant environmental mitigation measures set out in the outline management plans are secured and can be enforced. The. Operational noise is controlled through the **Outline OEMP [REP1-060]**, which is secured through Requirement 14 of the **Draft DCO [REP1-014]**. The detailed design and final selection of operational plant will be required to achieve the committed operational noise levels. The Outline Operational Environmental Management Plan also provides a mechanism for noise emissions to be assessed against the committed levels and for further mitigation to be applied where required. The Council's request for a separate programme of physical noise monitoring following commissioning remains under discussion through the **Statement of**

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		• Requirement 13 (Construction and Environmental Management Plan) • Requirement 21 (Decommissioning and Restoration) The Council also raise that there are no requirements to secure: • Noise verification programme to monitor operational noise;	**Common Ground with South Norfolk District Council [REP1-086]**.
LIR-SNC-153	Draft DCO	8.3.2 The Council is also concerned that Article 7 (Defence to Proceedings in Respect of Statutory Nuisance) may have implications for the protection of local communities from construction and operational impacts and considers that the necessity and scope of that provision should be carefully examined. Where mitigation measures are relied upon to reduce identified adverse effects, the Council considers that the DCO should secure clear, outcome-based obligations rather than relying solely upon the submission of management plans for future approval.	As explained in the **Statutory Nuisance Statement [APP-208]** it is considered that the construction, operation (and maintenance), and decommissioning phases of the Scheme will not give rise to impacts which would constitute a statutory nuisance. Mitigation that helps achieve this conclusion is set out in the **Statutory Nuisance Statement [APP-208]** and includes the controls set out in the various management plans. The Applicant considers that this mitigation is sufficiently detailed to secure the obligations required of the Applicant; some of these are outcome-based, for example, the **Outline OEM P[REP1-060]** the BESS Enclosure will be mitigated to achieve the predicted sound levels set out in **ES: Chapter 12 - Noise and Vibration [APP-048]** and predicted sound levels along the PRoW will not

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			exceed 55dB(A). The local planning authority must approve of the mitigation plans in the requirements, notably the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]** and the **Outline DEMP [REP1-062]**. As set out in the **Explanatory Memorandum [REP1-016]**, the Applicant has included Article 7 in the **Draft DCO [REP1-014]** in the event that noise impacts arise which would constitute a statutory nuisance. Section 158 of the Planning Act 2008 confers statutory authority for the carrying out of development or doing anything else authorised by the DCO. This acts as a defence in any criminal or civil proceedings for nuisance in the absence of any contrary provision in the DCO. Section 152 then provides that where the defence of statutory authority provided by section 158 applies, the person affected by that nuisance may only claim compensation. Taken together, the effect is to convert a person's claim for an injunction to stop noisemaking activity into one for compensation. The effect of article 7 is to limit the scope of section 158, so that the statutory authority is only available in the circumstances described in paragraph (2). It is considered very unlikely that the Applicant would

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			need to rely upon the statutory defence conferred by section 158 of the Planning Act. However, should such a circumstance arise, it is considered appropriate that the statutory defence should be limited to only the circumstances listed in article 7(1). Article 7 is precedented in made solar DCOs, including the Longfield Solar Farm Order 2023, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025, the Tillbridge Solar Order 2025, the Fenwick Solar Farm Order 2026 and the recently granted Green Hill Solar Farm Order 2026.
LIR-SNC-154	Draft DCO	8.4.1 In summary, the Council considers that the Draft DCO, in its current form, does not yet provide a sufficiently clear, enforceable or comprehensive framework for managing the environmental and community impacts of the project. Strengthening of Requirements and recognition of governance changes are all necessary to ensure that impacts are appropriately controlled throughout the lifecycle of the development.	The Applicant refers to its responses in IDs LIR-SNC-149 to LIR-SNC-153 in this document.
LIR-SNC-155	Summary of Principal Issues for the	9.1 South Norfolk District Council has prepared this LIR to assist the Examining Authority in understanding the localised effects of the East Pye	The Applicant will continue to engage constructively with SNDC throughout the Examination on these matters and consider any actions recommended by

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
	Examination - Overview	Solar Project within the district. The project includes a 500mW solar farm, a Battery Energy Storage System 'BESS', up to three 132kV substations, up to three 400kV substations for grid connection infrastructure, and a new National Grid substation. 9.2 While the Council recognises the national need to support proposals for renewable energy and the contributions this would make towards meeting the UK's commitment to achieve net zero carbon emissions by 2050, the proposal gives rise to significant environmental, landscape, heritage and amenity impacts at the local level. These impacts and the adequacy of proposed mitigation form the core of this LIR. 9.3 South Norfolk District Council has identified several key issues that require particular attention during the Examination of the East Pye Solar Project. These issues represent the matters of greatest local significance, where impacts are potentially substantial and where further clarification, mitigation or amendments to the Requirements in the Draft DCO	SNDC to bring both parties into alignment where appropriate

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		are necessary to ensure appropriate protection of the district's environment, heritage, communities and infrastructure.	
LIR-SNC-156	Summary of Principal Issues for the Examination – Landscape and Visual Harm	9.4 The proposed introduction of sites for 4.5 metre rotating solar panels, BESS, substations, acoustic barriers, and associated electrical infrastructure within South Norfolk will lead to major changes in the district's rural character. The open and gently undulating landscape allows for long-distance views in which these sites will be highly prominent. The cumulative presence of other infrastructure e.g. existing pylons, substations, solar farms and BESS sites intensifies perceived industrialisation.	The Applicant notes the Councils comment. For the 4.5m height of solar panels please refer to the Applicant's response to LIR-SNC-056. For the changes to rural character please refer to the Applicant's response to LIR-SNC-007. For cumulative please refer to the Applicant's response to LIR-SNC-018 and LIR-SNC-039.
LIR-SNC-157	Summary of Principal Issues for the Examination – Landscape and Visual Harm	9.5 Particular concern arises from: • The removal of vegetation including hedgerows and veteran trees (irreplaceable habitats under the NPPF); • Potential planting and mitigation to lead to harmful impacts on the open settings of heritage assets; and	The Applicant has sought to avoid and minimise the loss of existing vegetation. A number of hedgerows have been identified for removal to facilitate construction of the Scheme and installation of the Cable Route Corridor as shown in the **Outline LEMP [REP1-064].** In the majority of cases these hedgerows will be reinstated and replaced following construction as shown on the **Green Infrastructure Strategy [REP1-013].**

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		• Uncertain survey information for hedgerows and vegetation.	The Scheme has committed to retain and protect all veteran trees within the Order Limits. **ES Volume 3, Appendix 7.10 Preliminary AIA [APP-150]** identifies four clashes with the indicative access routes as shown on **ES Volume 2, Figure 4.1 Indicative Masterplan [REP1-025].** These clashes are a result of the tree buffer zones applied to the Ancient and Veteran trees within the Order Limits. The access routes have been considered as a design element for the purposes of the preliminary AIA and tree constraints analysis, however due to the indicative nature of the access route and flexibility to relocate within Work No 4, it is considered that these clashes can be dealt with at detail design and protection measures identified in future iteration of the AIA. This approach will align with the commitments set out in the **Design Principles, Parameters, and Commitments [REP1-078],** and **Outline CEMP [REP1-058].**
LIR-SNC-158	Summary of Principal Issues for the Examination – Landscape and Visual Harm	9.6 The current limitations of the survey and assessment information, for example, gaps or uncertainties relating to hedgerow condition and extent, create uncertainty regarding the full impact of the scheme. The Council's experience from other NSIPs indicates that additional implications can emerge after a Development Consent Order is granted, including the need for further	The ES **[APP-036 to APP-195]** and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]**.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		tree or vegetation removal to facilitate temporary access, drainage requirements, or other construction related activities. These can sometimes fall outside the defined Order limits, leading to unforeseen environmental effects.	The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters of the Scheme. The Environmental Statement therefore assesses the likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme. The assessment considers both the sensitivity of the site and results to the surrounding community. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the **Draft DCO [REP1-014]**. The Applicant is committed to undertaking a further pre construction survey and Arboricultural Method Statement in advance of the construction works. The Applicant will submit the final AIA, Arboricultural Method Statement, Tree Protection Plans and hedgerow impact schedules to the relevant local authority arboricultural officer and affected parish Tree Wardens for approval. The **Outline CEMP [REP1-058]** states (Table 3.2): • 'A pre-construction tree survey will be undertaken prior to construction in accordance with BS 5837:2012 (or in line East Pye Solar The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
			EXAM/8.8 Planning Inspectorate Reference: EN0110014 1271 ID Theme Representation Applicant's Response construction-ready, tree-by-tree and hedgerow by-hedgerow assessment of all works, all access routes, all visibility splays, all AIL routes, all compounds, all haul roads and all root protection incursions. with most recent adopted standard and industry guidelines). This survey will inform the tree protection zones to be applied during construction; • An Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works; • All tree work operations will be carried out in accordance with BS3998:2010 'Recommendations for Tree Work'; current arboricultural industry guidelines and best practice; and all relevant Health & Safety standards.'
LIR-SNC-159	Summary of Principal Issues for the	9.6 The project will result in minor negligible harm to multiple designated heritage assets, including listed buildings, conservation areas and	This has been addressed in LIR-SNC-004, LIR-SNC-005, LIR-SNC-037, LIR-SNC-045, LIR-SNC-047, LIR-SNC-049.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
	Examination – Heritage Impacts	scheduled monuments. Two Grade II listed buildings, Moulton Farmhouse and Hillside House are expected to experience a moderate degree of harm due to the impact to their settings. 9.7 The Examining Authority's attention is drawn to: • The erosion of rural settings and long-distance views that contribute strongly to asset significance; • Underestimation of harm for two heritage assets identified by the Council; • Cumulative impacts from multiple energy and grid-related schemes altering the wider historic landscape.	
LIR-SNC-160	Summary of Principal Issues for the Examination – Ecological Risks and Designated Sites	9.8 The project involves a number of sites containing various infrastructure associated with the development across the district. 9.9 Principle Issues include: • Fragmentation of habitats across the order limits potentially	Likely effects on ecology and biodiversity including designated sites and irreplaceable habitats, are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, with additional consideration of habitat functionality through the Biodiversity Net Gain (BNG) process. The Scheme has been designed to include landscape and ecological enhancement with the landscaping shown in the **Green Infrastructure Strategy [REP1-013]** and the

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		impacting wildlife and protected species such as bats; • Impacts on irreplaceable habitats and trees including the inadequacy of existing surveys for tree and hedgerow losses; • Loss of created and enhanced habitats secured through the DCO during the decommissioning phase of the development.	long-term habitat management and monitoring measures described in the **Outline LEMP [REP1-064]**. Embedded mitigation, including design buffers such as offsets to woodland, hedgerow and watercourses, are set out in **Section 8.8 of ES-Chapter 8 – Ecology and Biodiversity [APP-044]** and the **Design Principles, Parameters and Commitments [REP1-078]**. It is considered unlikely that the reversion of the Sites back to agricultural practices would result in an extensive loss of existing or created habitats of ecological importance. Such habitats are primarily associated with field margins and the existing farmland landscape, such as hedgerows, rivers, lowland deciduous woodland, ponds; there are no plans to remove such features. Following from 60 years of favourable management, these habitats would be in an ecologically favourable condition compared to the baseline. Any works to remove habitats as part of the decommissioning of the Scheme or by the landowner following decommissioning would need to comply with the legislative requirements that apply to such habitation at that point in time.
LIR-SNC-161	Summary of Principal Issues for the Examination –	9.10 There is insufficient baseline monitoring to determine the extent of construction noise, operational noise, and vibration impacts, especially in	The Applicant notes that this section summarises the noise and vibration matters addressed elsewhere in the **Council's Local Impact Report**. The Applicant refers to its responses to LIR-SNC-013 to LIR-SNC-

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
	Noise and Vibration	quiet rural areas. The proposed reliance on percussive piling is unsupported by geotechnical data and may result in significant nuisance. 9.11 Principle Issues include: • The absence of evening background noise levels which are proven to have a significant drop from daytime noise levels, therefore current modelling and assessments could result in a significant observed adverse effect level (SOAEL); • Lack of information regarding National Grid Substation to understand noise levels being generated from this element of the Project; • Inadequate justification for reliance on percussive piling construction method; • The need for additional requirements in the DCO.	016 and LIR-SNC-075 to LIR-SNC-077, which address: • the baseline sound survey and consideration of evening background sound levels; • the assessment of percussive piling as a reasonable worst-case installation method and the application of Best Practicable Means; and • operational noise from the BESS, Project Substations and National Grid Substation. The Applicant also refers to its response to LIR-SNC-152 regarding the control and monitoring of operational noise through the **Outline OEMP [REP1-060]**, and the Council's request for separate physical noise monitoring following commissioning. The Applicant does not agree that the noise and vibration assessment is incomplete. The above responses explain the assessment undertaken, the supplementary information provided during the Examination and the measures by which construction and operational noise will be controlled.
LIR-SNC-162	Summary of Principal Issues	9.12 South Norfolk hosts an unusually high concentration of NSIPs, grid	See the Applicant's response to LIR-SNC-018.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
	for the Examination – Cumulative Impact on Energy and Infrastructure Projects	reinforcements, solar farms, BESS facilities and associated development. The combined impacts of these schemes, including overlapping construction periods, raise significant concerns regarding landscape change, ecological pressures, heritage degradation, traffic disruption and effects on community amenity. 9.13 The cumulative effect of all of the solar panel sites in addition to the multiple Project Substations and National Grid Substation, and the concentration of this around Great Moulton is of particular concern due to their combined visual dominance and impact on residential amenity and therefore should be given significant weight within the determination.	
LIR-SNC-163	Summary of Principal Issues for the Examination – Draft DCO Requirements and Governance Issues	9.14 The Draft DCO contains several deficiencies that require rectification, including: • Insufficient Requirements relating to landscaping, noise, contaminated land and lighting;	The Applicant refers to its responses in IDs LIR-SNC-149 to LIR-SNC-153 in this document.

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
		• Lack of safeguards ensuring specialist consultees are engaged in key approvals; • The need to ensure that Requirements remain operable and enforceable notwithstanding any future local government reorganisation 9.15 Strengthening and clarifying the Requirements will be essential to securing acceptable environmental and community outcomes.	
LIR-SNC-164	Summary of Principal Issues for the Examination – Socio-Economic and Community Effects	9.16 Town centres, heritage locations, walking routes and visitor-dependent businesses may face reduced attractiveness during construction and from long-term landscape change. 9.17 There is limited local benefit in terms of direct electricity supply, despite the substantial infrastructure being hosted within the district.	Regarding impacts on local tourism, the Applicant refers to the response provided to LIR-SNC-038. The Scheme will provide energy to the national transmission network. The wider benefits of the Scheme, including contribution to decarbonisation, energy security and grid resilience, are set out in the **Statement of Need [APP-206]** and **Planning Statement [REP1-074]**. The Applicant is also developing proposals for a Community Benefit Fund, as referenced in the **Planning Statement [REP1-074].**

ID	Theme(s)	South Norfolk Council Comments	Applicant's Response
LIR-SNC-165	Summary of Principal Issues for the Examination – Conclusion	9.18 The Council identifies the following overarching issues to be key matters for the Examination: • Significant visual and landscape harm; • Moderate degree of harm to heritage assets requiring great weight; • Insufficient noise, vibration and pollution assessment; • Substantial cumulative impacts from multiple NSIPs and energy schemes; • Gaps and ambiguities in the Draft DCO Requirements; • Adverse socio-economic and community effects. 9.19 These matters are central to determining whether the proposed project, as submitted, sufficiently mitigates its local impacts and whether further measures are needed to secure an acceptable outcome for South Norfolk.	The Applicant has provided detailed responses to each of the issues identified by SNDC. The Applicant will continue to engage constructively with SNDC on these matters throughout the Examination.

4 The Applicant's Responses to Suffolk County Council's Local Impact Report

Table 4.1 Applicant's responses to Suffolk County Council's Local Impact Report [REP1-212]

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
LIR-SCC-001	General Remarks	1.1 Suffolk County Council ("SCC") is a statutory consultee for Nationally Significant Infrastructure Projects ("NSIPs") which involve works within or neighbouring its administrative area. Officers have scrutinised the proposals submitted by the Applicant and have spoken with local communities and local Councillors. 1.2 This Local Impact Report ("LIR") has been prepared in accordance with Section 60(3) of the Planning Act 2008 (as amended) and having regard to the guidance for Local Authorities provided by the Planning Inspectorate ("PINS"),1 and the Ministry for Housing, Communities and Local Government ("MHCLG") Planning Act 2008 ("PA2008") guidance for the Examination stage for NSIPs.2 1.3 In this LIR, SCC seek to set out its concerns to the Examining Authority	The Applicant notes the scope of the Local Impact Report and has provided detailed responses, or cross references to where previous responses have been provided, herein.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		("ExA"). The Council hopes to influence improvements to the proposed development, in the interests of the local communities, so that the Development Consent Order ("DCO") (if made) presents the best version of the scheme achievable. 1.4 The East Pye Solar proposals consist of construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS), ancillary infrastructure, customer substations and Grid Connection infrastructure (including a new National Grid substation). The project has a planned generation capacity of 500MW. 1.5 The proposed development would allow for the generation and export of over 100 Megawatts (MW) Alternating Current (AC) of renewable energy and is therefore considered a Nationally Significant Infrastructure Project (NSIP). 1.6 The Order Limits, comprising several industrial sites, is located within the administrative boundaries of Norfolk	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		County Council and South Norfolk District Council, covering approximately 1,212.3 hectares of land in total. 1.7 Whilst no part of the proposed development lies within Suffolk, SCC is considered a statutory consultee for the application as a neighbouring local authority. As a neighbouring authority, SCC's interest in the proposed development is restricted only to matters relating to Suffolk which is reflected in the contents of this submission. In this case, the matters of interest to SCC relate to traffic and transport, particularly movements of Abnormal Indivisible Loads, and economy, skills and tourism. In what follows, the Council details its concerns within these areas for which further information and changes to submitted documents are required in the Council's view. 1.8 This representation sets out in the first section the SCC's key issues, with the second part (in Appendix A) providing detailed technical comments. Given the extent and nature of the matters of concern to SCC.	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
LIR-SCC-002	Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026	1.9 SCC adopted its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy on 24 February 2026, superseding the previous version of the policy adopted in May 2023. The purpose of this policy is to outline how, in principle, the Council will engage and influence other parties to ensure the interests of communities are prioritised as far as possible in terms of minimising, mitigating and compensating for adverse impacts and securing high-quality, meaningful community engagement. SCC has published guidance on community wellbeing and engagement which is considered essential for the promoter to follow. 1.10 The policy is relevant for the Council's position on the East Pye Solar proposals, and states: "Projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."	The Applicant notes SCC's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026. The **ES [APP-036 to APP-195]** provides a full environmental assessment in accordance with relevant legislation and guidance. The assessment of cumulative effects is set out in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055]** and topic-specific chapters, informed by **ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116].** Mitigation is embedded and secured through the **outline management plans [REP1-058 – REP1-071]** and Schedule 2 of the **Draft DCO [REP1-014]**. The Applicant's position on the planning balance is set out within the **Planning Statement [REP1-074]**, which concludes that the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible. The residual significant adverse effects in relation to landscape and visual, BMV quality land are considered to be outweighed by the substantial benefits of the Scheme, including the contribution to Clean Power 2030, and localised benefits to biodiversity, green infrastructure strategy, and employment and training. The Applicant notes SCC's comment in respect of cost recovery. Appropriate agreements will be entered into with the Council in accordance with

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		1.11 The Council will follow this approach in this submission and throughout the Examination process. 1.12 The Council consider it essential that an effective Planning Performance Agreements (PPAs), or other appropriate charging mechanism, is agreed with the promoter. Its Energy and Climate Adaptive Infrastructure Policy states: "*The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters."* 1.13 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters. 1.14 SCC considers it essential for the Applicant to consult SCC's relevant Supplementary Guidance Documents for	any cost recovery guidance or regulations if applicable to the Scheme and in place, at the time of dialogue.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		Traffic and Transport6 and Socioeconomics and Skills7 matters in relation to the application. The concerns raised in this submission reflect what SCC expects from NSIP applications as set out in these guidance documents.	
LIR-SCC-003	LIR Terms of Reference	2.1 East Pye Solar (referred to as "East Pye" or "the Applicant") has submitted a DCO application for the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS). 2.2 This Local Impact Report addresses the local impacts of the proposals. 2.3 The LIR relates to the impacts of the proposed scheme as it affects the administrative areas of Suffolk County Council which is an upper tier local authority. 2.4 This LIR does not describe the Works any further, relying on the Applicant's descriptions as set out in the DCO application documents. 2.5 SCC has experience with the NSIP process, through pre-application to post	The Applicant notes the scope of the Local Impact Report and has provided detailed responses, or cross references to where previous responses have been provided, herein.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		decision activities including the Discharge of Requirements ("DOR"). SCC has been a statutory consultee on various NSIPs, these include Offshore Wind Farms (i.e. East Anglia One, East Anglia Three, East Anglia One North, East Anglia Two, Fives Estuaries, North Falls), Solar Farms (Sunnica Energy Farm), Electricity Transmission Infrastructure (Bramford to Twinstead), and a Nuclear Power Station (Sizewell C). 2.6 Suffolk County Council is also familiar with a promoter's responsibilities under the Planning Act 2008 ("PA2008") regime, having successfully promoted the Lake Lothing Third Crossing DCO in Lowestoft – now operational and known as the Gull Wing Bridge. 2.7 Section 60(3) of the Planning Act 2008 defines Local Impact Reports as: i. "a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)." 2.8 The Planning Inspectorate ("PINS") Advice note one: Local Impact Reports, which advises:	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		ii. "In coming to a decision, the Secretary of State must have regard to any LIRs that are submitted by the deadline. Local authorities are therefore strongly encouraged to produce LIRs when invited to do so." iii. "Local authorities should cover any topics they consider relevant to the impact of the proposed development on their area." 2.9 This LIR provides an overview of policies relevant to all issues, then details local impacts by issue. First, outlining a summary of the concerns relevant to that discipline or issue, then policy context (including the Council's Relevant Representations), before detailing the local impact assessment for that issue. This assessment is broken down into construction, operational, and decommissioning phase impacts. Further detail on the concerns and required mitigation to improve these will be provided, where appropriate. 2.10 Where the Applicant has sought to address these concerns, these will be referenced to the application documentation, including the DCO	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		articles, requirements and obligations where relevant.	
LIR-SCC-004	General Remarks	3.1 The proposed route for Abnormal Indivisible Loads (AIL) routing will be delivered by sea to ports at Felixstowe or Kings Lynn. Whilst the final port of entry is still under consideration SCC will comment on the description of areas along the proposed routing of AILs from Felixstowe, along the A14 onto the A140 as detailed in the Environmental Statement (ES) Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1] Para 7.29. 3.2 The town of Felixstowe has transport links through the A14, the A14 is also used for the operation of the Port of Felixstowe. 3.3 The A14 is characterised by dual carriageways, the road begins at the port of Felixstowe and links up to the A140 just before Needham Market. The road itself crosses over Orwell bridge and the Orwell Estuary SSSI. The A14 also crosses over the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).	The Applicant notes the description of the A14 and A140 corridors provided within the representation. The proposed AIL route from Felixstowe is described within Section 7 of **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. The Applicant notes that the AIL routeing strategy has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs. Further information regarding the management of AIL movements is provided within Section 6 of the **Outline CTMP [REP1-068]**. More detailed arrangements for AIL movements would be provided within the detailed Construction Traffic Management Plan secured through the DCO requirements.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		3.4 The A140 is an A road that links to the A14 in Suffolk. The road is situated by rural landscapes on either side, with properties and businesses facing onto the A140.	
LIR-SCC-005	National Policy Context	**A Green Future: Our 25 Year Plan to Improve the Environment** 4.1 The "A Green Future: Our 25 Year Plan to Improve the Environment" document is the Government's high level environmental strategy which includes targets in a number of relevant areas.	The Applicant agrees on the need to provide and where possible exceed targets relating to decarbonisation and providing renewable energy infrastructure.
LIR-SCC-006	National Policy Context	**The UK's Industrial Strategy** 4.2 By 2035, the Government has the ambition for the UK to be a global leader in Clean Energy Industries, and to become a world-leading exporter of low-carbon products, services and innovation.	The Applicant agrees on the need to provide and where possible exceed targets relating to decarbonisation and providing renewable energy infrastructure.
LIR-SCC-007	National Policy Context	**National Policy Statements** 4.3 When considering NSIP proposals under the Planning Act 2008 the relevant Secretary of State will refer to National Policy Statements ("NPS"). 4.4 Overarching NPS for Energy ("EN-1") is the overarching national policy	The Applicant's position on the compliance of the Scheme with national and local policy is set out within both the **Planning Statement [REP1-074]**, and the **Policy Compliance Document [REP1-076]**. An assessment of the environmental impacts of the Scheme is set out within the **ES [APP-036 to APP-195]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		statement for energy and was published in July 2011, updated in November 2025 which came into force in January 2026. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind. 4.5 NPS for Renewable Energy Infrastructure ("EN-3") is the UK Government's strategy for renewable energy infrastructure. 4.6 NPS for Electricity Networks Infrastructure ("EN-5") is the UK Government's strategy for electricity network infrastructure. This policy statement applies to not only transmission systems but also associated infrastructure such as substations and converter stations. This policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.	

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LIR-SCC-008	National Policy Context	**National Planning Policy Framework** 4.7 The National Planning Policy Framework ("NPPF") was last updated in August 2026 and provides national policy in respect of proposals under the Town & Country Planning Act 1990. It is however also a material consideration when considering NSIP proposals.	The Applicant's position on the compliance of the Scheme with the NPPF, published in August 2026, is set out within both the **Planning Statement [REP1-074]**, and the **Policy Compliance Document [REP1-076]**, updated at Deadline 1.
LIR-SCC-009	National Policy Context	**Community Benefits** 4.8 The Government published social research and analysis report on the topic of community benefits, for electricity transmission network infrastructure, on 21 March 2024. This document includes communities view and preferences towards community benefits, noting that 67% of residents were supportive of community benefits for transmission infrastructure and 69% were interested in co-designing a community benefit scheme. 4.9 On 10 March 2025, the Government published its guidance document concerning Community Funds for Transmission Infrastructure. This details the voluntary approach to community benefits for electricity transmission	The Applicant is aware of the publications referenced and the ongoing discussions around mandatory community benefits. The Applicant refers to its response NCC-009 in **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]** and BEN-001 in **The Applicant's Response to Relevant Representations Part 5 - By Theme [PDA-012]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		infrastructure, outlining that community benefits should: delivery what communities want, support the capacity and capability of communities, result in a lasting legacy, be flexible to adapt to community preferences, and secure fairer and more transparent outcomes. 4.10 The Government consulted on a mandatory approach to community benefits for low carbon energy infrastructure between 21 May and 16 July 2025. Subject to parliamentary approval, this would apply to projects over 5MW which have yet to commence by late 2027.	
LIR-SCC-010	Local Policy Context	**Development Plan** 4.11 The full text of the relevant Development Plan policies can be found Babergh and Mid Suffolk Joint Local Plan Part 1. 4.12 The planning services of the Babergh District and Mid Suffolk District Councils were merged in April 2019. Joint development plan documents are currently being developed. At the time of writing part 1 of the local plan has been adopted as planning policy. Part 2	The Applicant notes the relevance of Policy LP29 – Safe, Sustainable and Active Transport of the Babergh District and Mid Suffolk Joint Local Plan Part 1; and the Suffolk Local Transport Plan 2025-2040 and Green Access Strategy.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		remains undeveloped as a new local plan is being produced. 4.13 Relevant policies include Policy LP29 which states that significant impacts on highway safety or the function of the highway network must be mitigated. Impact on highway safety must not be unacceptable and the residual cumulative impact on the road network must not be severe. Other Relevant Local Policy 5.1 The following paragraphs note several additional documents produced and endorsed by the relevant authorities which represent local policy on specific topics which the Councils consider of relevance to the proposed developments. 5.2 Suffolk County Council, as Local Highway Authority ("LHA"), published the Suffolk's Local Transport Plan 2025-2040. 5.3 Suffolk County Council has also published a Green Access Strategy, which is a rights of way improvement plan, covering the period 2020 to 2030.	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
LIR-SCC-011	Socioeconomics	6.1 Suffolk County Council acknowledges that the Environmental Statement (ES) identifies the relevant national policy framework supporting renewable energy development and recognises the potential for socio-economic benefits associated with major infrastructure. However, the Council considers that the application documentation does not provide sufficient evidence to robustly identify, assess or secure these benefits at a local level and therefore limited weight should be afforded to the conclusions reached. 6.2 SCC's consultation responses consistently sought a demand-led, spatially defined and evidence-based assessment of workforce and skills, including clear identification of labour market geographies, workforce composition and delivery mechanisms. The Council notes that although the ES and Outline Employment, Skills and Supply Chain Strategy (ESSCS) have evolved, these core requirements have not been fully addressed.	The Applicant refers to the responses provided to SCC-007 and SCC-008 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
LIR-SCC-012	Socioeconomics	6.3 While the ES Chapter 14 and the Outline ESSCS formally reference a wider geographic area including Suffolk, the assessment is substantively centred on Norfolk. Suffolk is not analysed as a distinct or functional labour market area, and there is limited evidence of workforce modelling, skills capacity assessment or delivery mechanisms relating specifically to Suffolk. As a result, the documents do not provide a robust assessment of cross-boundary labour market effects or demonstrate how socio-economic benefits would be realised within Suffolk. This represents a material limitation of the assessment and further reduces the weight that can be attributed to the claimed socio-economic benefits. 6.4 Chapter 14 identifies employment generation during construction and operation; however, the assessment does not demonstrate how these opportunities would translate into meaningful benefits for the local or regional workforce. The ES indicates that only a very small proportion of jobs would be realised locally, with the majority of employment supported	The Applicant refers to the responses provided to SCC-009 and SCC-010 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		outside the host and neighbouring areas. This reflects high assumed levels of leakage and reliance on non-local labour, yet the implications of this for local economic benefit are not adequately assessed. As a result, the magnitude and significance of beneficial effects for local residents are overstated.	
LIR-SCC-013	Socioeconomics	6.5 The assessment does not meet the requirements of SCC's Supplementary Guidance on the Socio-Economic Effects of NSIPs, which were clearly articulated through consultation. In particular, the ES does not adopt a sufficiently granular, demand-led approach or define workforce and supply chain geographies by phase and skill level. The reliance on simplified spatial assumptions and absence of a clearly defined functional labour market represents a substantive evidential deficiency. This prevents a robust assessment of workforce sourcing, labour market behaviour and interaction with existing conditions, including those in Suffolk as part of a shared labour market with Norfolk.	The Applicant refers to the response provided to SCC-011 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-014	Socioeconomics	6.6 The ES also does not adequately assess labour market constraints,	The Applicant refers to the response provided to SCC-012 in **The Applicants Response to**

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		including skills shortages, training capacity, and barriers to local labour participation. Although the baseline identifies a mismatch between workforce supply and skills demand and a reliance on imported labour, this is not translated into an assessment of labour market capacity or delivery constraints. There is limited consideration of further education provision, apprenticeship pipelines or alignment with local skills strategies. As a result, the sensitivity of the labour market and skills system is not robustly evidenced, and the assessment fails to demonstrate that sufficient capacity exists to support the Scheme. 6.7 The identification of significant beneficial effects on employment and skills is therefore not justified. These conclusions are derived largely from estimates of gross employment generation rather than a realistic assessment of net additional benefit or deliverability. In the absence of robust workforce modelling and labour market analysis, the attribution of Major and Moderate beneficial effects is likely to overstate the socio-economic contribution of the Scheme and does not	**Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		provide a sound basis for decision-making.	
LIR-SCC-015	Socioeconomics	6.8 The assessment is further undermined by the absence of secured mitigation and delivery mechanisms. While the ES refers to an Outline Employment, Skills and Supply Chain Strategy, there is no evidence that commitments to local employment, training or skills development are secured through the Development Consent Order or associated requirements. Without a detailed and enforceable strategy aligned to identified labour market needs, the realisation of benefits remains uncertain and cannot be relied upon in the planning balance.	The Applicant refers to the response provided to SCC-013 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-015	Socioeconomics	6.9 The ES concludes that there would be Major and Moderate beneficial cumulative effects on employment, supply chain and skills. However, SCC raised substantive concerns at consultation stage regarding cumulative labour market pressures, including the interaction of East Pye with other NSIPs across Norfolk and Suffolk. The Council considers that these concerns have not been adequately addressed.	The Applicant refers to the responses provided to SCC-014, SCC-015, and SCC-016 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		6.10 The cumulative assessment relies primarily on the aggregation of employment outputs rather than a demand-led analysis of labour market capacity. While the ES acknowledges overlapping construction phases, it does not undertake scenario testing, workforce modelling or probabilistic assessment of labour supply availability. This is inconsistent with both SCC guidance and EIA best practice. 6.11 In particular, the assessment does not meaningfully account for major existing and committed NSIPs already affecting the regional labour market. One such project is Sizewell C, currently under construction in Suffolk, which is not adequately reflected despite generating substantial demand for construction labour and skills provision. This represents a material omission, as major infrastructure schemes draw from a shared and finite regional and national labour pool. Evidence from the Construction Industry Training Board indicates that the construction workforce is highly mobile, with around one in five workers travelling more than 50 miles to site and approximately 28% having	

ID	Theme(s)	Suffolk County Council Comments	Applicant's Response
		worked away from home in the previous year, reflecting the project-based nature of the sector (CITB Workforce Mobility and Skills in the UK Construction Sector 2022). In this context, the failure to incorporate existing demand from Sizewell C materially underestimates cumulative labour market pressures.	
LIR-SCC-016	Socioeconomics	6. 12 The ES fails to assess the consequences of concurrent demand, including competition for skilled labour, displacement between projects, wage inflation and delivery risk. It also does not evaluate the cumulative pressure on the regional skills system, including training providers and education infrastructure, despite identifying skills and the labour market as highly sensitive receptors. 6.13 Similarly, the approach to in-combination effects relies on the aggregation of residual effects and the application of professional judgement. This assumes that effects occur independently, when in reality multiple schemes will draw from the same limited workforce. As such, this approach does not provide a robust assessment of	The Applicant refers to the responses provided to SCC-014, SCC-015, and SCC-016 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

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		indirect or in-combination effects as required by the EIA Regulations.	
LIR-SCC-017	Socioeconomics	6.14 The geographic scope of the cumulative assessment is also insufficient. SCC previously highlighted the need to reflect cross-boundary labour market dynamics and include Suffolk within detailed modelling, yet this has not been adequately addressed. The absence of a clearly defined functional labour market further undermines the robustness of the assessment.	The Applicant refers to the responses provided to SCC-014, SCC-015, and SCC-016 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-018	Socioeconomics	6.15 Finally, the claimed cumulative benefits are not supported by secured mitigation or coordination mechanisms. There is no evidence that employment and skills initiatives across schemes will be coordinated or aligned and only a limited proportion of employment is likely to be realised locally. This significantly reduces the extent to which benefits can support Suffolk's economy or skills system.	The Applicant refers to the responses provided to SCC-014, SCC-015, and SCC-016 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-019	Outline Employment, Skills and	6.16 SCC welcomes the inclusion of an Outline ESSCS and the Applicant's stated intention to secure a detailed strategy through a DCO Requirement. However, consistent with SCC's	The Applicant refers to the responses provided to SCC-007, SCC-012, and SCC-013 in **The Applicants Response to Relevant**

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	Supply Chain Strategy	consultation responses, the Outline ESSCS does not demonstrate that workforce demand, skills needs or delivery mechanisms have been adequately assessed or secured. 6.17 The Council's guidance requires a demand-led, effects-based approach focused on workforce and skills requirements. The Outline ESSCS is largely descriptive and does not provide the detailed workforce modelling necessary to inform the assessment of impacts across transport, accommodation, housing and public services. As a result, it does not provide a reliable basis for the Environmental Impact Assessment.	**Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-020	Outline Employment, Skills and Supply Chain Strategy	6.18 Although headline workforce figures are presented, there is no comprehensive workforce definition by phase, skill level or duration. The temporal distribution of labour demand is not defined, and there is no distinction between key construction roles. This fails to demonstrate how many workers are required, what skills they will have, and for how long. SCC expects a detailed workforce assessment covering	The Applicant refers to the responses provided to SCC-010 and SCC-011 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

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		workforce numbers, occupations, skills, role durations and the anticipated level of both home-based and non-home-based employment across all project phases, in order to support coordinated labour market planning and assessment of cumulative effects.	
LIR-SCC-021	Outline Employment, Skills and Supply Chain Strategy	6.19 The submission also fails to define labour catchments or workforce geographies. There is no distinction between home-based and non-home-based workers, nor any assessment of how labour will be sourced geographically. The absence of defined workforce geographies prevents a meaningful assessment of labour market effects, infrastructure impacts and community interaction. This also limits the ability of SCC, in its role operating the Regional Skills Coordination Function (RSCF), to undertake coordinated workforce planning across Suffolk and manage cumulative labour market pressures.	The Applicant refers to the response provided to SCC-024 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-022	Outline Employment, Skills and	6.20 In addition, the Outline ESSCS does not adopt the required scenario-based approach. SCC guidance requires testing of low, medium and high	The Applicant refers to the responses provided to SCC-024 and SCC-012 in **The Applicants Response to Relevant Representations Part 1 -**

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	Supply Chain Strategy	scenarios of home-based employment to establish a reasonable worst-case. No such scenarios are provided, and there is no quantified estimate of local versus non local labour. As a result, the application does not provide a robust basis for assessing impacts or identifying mitigation. 6.21 In relation to skills and education, the proposed initiatives are not supported by an assessment of training capacity. There is no quantification of training demand or evaluation of whether existing further education and skills provision across Norfolk and Suffolk can respond. This limits confidence that the Scheme can be delivered without exacerbating existing skills shortages. SCC expects a jointly developed education and training strategy, aligned with the RSCF, demonstrating how the Applicant will engage with Further Education (FE), Higher Education (HE) and private providers, support coordinated curriculum planning and deliver inclusive training pathways such as apprenticeships, bootcamps and modular provision.	**Host and Neighbouring Local Authorities [PDA-008]**.

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LIR-SCC-023	Outline Employment, Skills and Supply Chain Strategy	6.22 The Outline ESSCS also does not adequately assess labour market effects, including displacement, competition for labour or cumulative impacts. While workforce mobility is acknowledged, there is no assessment of how the Scheme will interact with existing sectors or other major projects. SCC expects explicit commitment to ongoing information sharing on workforce demand and project timelines, and participation in coordinated workforce planning to manage cumulative pressures across Suffolk's NSIPs and major developments.	The Applicant refers to the response provided to SCC-027 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-024	Outline Employment, Skills and Supply Chain Strategy	6.23 Supply chain effects are similarly underdeveloped. Opportunities are identified but not quantified, and there is no assessment of the capacity of local and regional businesses to participate. SCC expects the ESSCS to set out how the Applicant will share supply chain workforce requirements with the RSCF and economic partners, enabling coordinated identification of skills gaps, strengthening of local supply chain capacity and timely engagement of businesses with project opportunities.	The Applicant refers to the response provided to SCC-028 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

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LIR-SCC-025	Outline Employment, Skills and Supply Chain Strategy	6.24 Finally, governance and delivery arrangements are not sufficiently defined. There is no clear mechanism for alignment with Suffolk County Council or Regional Skills Coordination Function, nor any commitment to joint monitoring arrangements or agreed performance measures. SCC expects the Applicant to commit to ongoing consultation and engagement, with SCC as a named consultee in the preparation, implementation and monitoring of the detailed ESSCS, including participation in joint governance structures and reporting against agreed employment, training and supply chain outcomes. To facilitate a robust detailed ESSCS as it relates to Suffolk, SCC considers it necessary for SCC to be a named consultee in the discharge of the relevant DCO Requirement on the face of the Order. 6.25 While the Outline ESSCS is presented as applying to a wider regional labour market, in practice it is predominantly focused on Norfolk and does not give sufficient consideration to Suffolk as part of an interconnected functional economic area. This is a	The Applicant refers to the responses provided to SCC-029, SCC-014, and SCC-016 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

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		material limitation given that Suffolk is already subject to substantial demand from existing and consented NSIPs, including Sizewell C and other major energy infrastructure, which draw from the same finite pool of skilled labour and training provision. The failure to meaningfully incorporate Suffolk within workforce modelling, skills capacity assessment and delivery mechanisms means that the Strategy does not reflect the realities of cross boundary labour market behaviour or cumulative demand. In the absence of a robust assessment of Suffolk's role within the labour market, and without alignment with Suffolk's education, training and coordination structures, the ESSCS does not demonstrate how adverse cumulative pressures will be managed or how benefits will be realised within Suffolk. This represents a substantive evidential gap which further undermines the reliability of the socio economic assessment and reduces the weight that can be attributed to the claimed skills and employment benefits in the planning balance.	

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LIR-SCC-026	Socioeconomics - Tourism	6.26 Section 14 of application document Environmental Statement Volume 1: Chapter 14 – Socio-Economics (Revision 1) [APP-050] states that, at peak, there will be an estimated 720 workers, which offers good economic opportunities for the South Norfolk area, with 360 net jobs created. Section 14.8.50 estimates that 120 workers may need to find temporary accommodation in the area during the construction phase. It also estimates that 612 rooms could be available for use during this period. Whilst the area is not a significant tourism hotspot, care must be taken to ensure that there still remains a suitable supply of tourism accommodation for visitors to the area. It would be good to see a plan in place to identify which areas may be best suited to accommodate temporary workers and how the peak will be managed. 6.27 There will be very little visual blight resulting from the constriction phase and little impact on any local tourism attractions. It would be good to see consideration given as to how the wider Norfolk and East Suffolk/ Waveney Valley tourism economy sector can work with the applicants to ensure that the	The Applicant refers to the responses provided to SCC-031 and SCC-032 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.

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		visitor economy remains buoyant during and after the main construction phase.	
LIR-SCC-027	Socioeconomics - Tourism	6.28 Cumulative impacts. As with section 2.7, it would be good to see an acknowledgement of the timing of this scheme and its likely overlap with other NSIPs such as Sizewell C, Ecopower, Sea Link, Norwich to Tilbury etc. Whilst there is some distance geographically from some of these schemes, there is nevertheless the potential for cumulative impacts in the effect on tourism accommodation, traffic etc	The Applicant refers to the response provided to SCC-033 in **The Applicants Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
LIR-SCC-028	Transport and Access	**Study Area** 7.1 [APP-094 (6.2.11.1 Environmental Statement Volume 2: Figure 11.1 Indicative Transport and Access Study Area) shows the indicative study area as along the A140 and the B1332 (north of Bungay). Whilst these roads are in Norfolk, SCC is concerned the scope does not consider the wider network particularly when construction traffic will be concentrated on particular routes such as the A140 and A143. The concerns would be that construction traffic funnelled onto the major roads such as the A140 could have adverse	The Applicant acknowledges the concerns raised regarding the extent of the transport study area. The transport study area was developed in accordance with the ISEP Guidelines for Environmental Assessment of Traffic and Movement (2023). In accordance with this guidance, assessment links were identified where traffic associated with the Scheme was predicted to increase total traffic or HGV traffic by more than the relevant IEMA thresholds, namely:

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		impacts in terms of congestion or road safety. 7.2 The A140 is approaching its link capacity in the 2045 Local Plan model run. This does not include the new Babergh / Mid LP growth. Further modelling would be required to assess link capacity in the construction period for this project.	• Rule 1: highway links where traffic flows or HGV flows would increase by more than 30%; and • Rule 2: specifically sensitive links where traffic flows or HGV flows would increase by 10% or more. Traffic beyond the identified transport study area shown in **Figure 11.1 – Indicative Transport and Access Study Area [APP-094]** is not expected to exceed these thresholds and was therefore not considered likely to result in material transport effects. This is supported by Table 11.6 within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, which shows that on Link 21 (A140), the Scheme is predicted to result in an increase of approximately 1% in total traffic and 2% in HGV traffic. These increases are substantially below the IEMA thresholds used to identify links requiring detailed assessment. Traffic travelling further from the Site along the A140 and connecting routes, including the A143, would be expected to diminish further. The Applicant therefore considers that the transport study area was defined in accordance with recognised industry guidance and that the effects of construction traffic on the wider highway network

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			have been assessed in line with relevant best practice.
LIR-SCC-029	Transport and Access	**A140-A14 to Scole** 7.3 This road runs north/south between the A14 at Needham Market and the A143 roundabout at Scole, on the Norfolk/Suffolk border. The road is a regionally important major route between Ipswich and Norwich with varying speed limits, carrying large numbers of commercial vehicles and commuters. There are limited footways along the length of the A140, with only a narrow footways along mostly the western side of the carriageway and no formal crossing facilities. 7.4 In terms of congestion the staggered crossroads with the A1120 in Earl Stonham has been identified as a concern and the Authority is pursuing funding for upgrading as a MRN scheme. 7.5 A particular area of concern is the A140 Stoke Ash crossroads, where increases in traffic are causing driver delay on the side arms, making drivers take risks to join / cross the main road risking an increase in the frequency of	The Applicant acknowledges the concerns raised regarding the potential cumulative effects of construction traffic on the A140 corridor, including at junctions which currently experience congestion. The transport study area was developed in accordance with the IEMA Guidelines for Environmental Assessment of Traffic and Movement and includes the A140 where traffic associated with the Scheme was predicted to result in material changes in traffic flows. Given the volume of existing traffic on the strategic highway network, including the A140, construction traffic associated with the Scheme is expected to dissipate within the wider traffic flow beyond the transport study area identified within **ES Volume 2**, **Figure 11.1 – Indicative Transport and Access Study Area [APP-094]**. The Applicant also notes that the traffic flows assessed within **ES Volume 1, Chapter 11 – Transport and Access (APP-047)** assume construction traffic associated with all relevant elements of the Scheme using a particular route occurs simultaneously. Figure 2.1 of the **Outline CTMP [REP1-068]** demonstrates that construction activities are phased and staggered throughout the

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		collisions at this location which is already higher than other junctions on the route. The cumulative impact of workers and/or construction vehicles using this strategic route in combination with increased local traffic and other NSIPs such as EcoPower and Norwich to Tilbury could be severe.	construction programme and, as such, actual traffic levels are expected to be lower than those assessed. The cumulative effects of the Scheme alongside other committed developments have also been assessed in Section 11.11 of **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**. In line with established assessment practice, this included developments where there was evidence that construction traffic would be using the same parts of the highway network as the Scheme at the same time. The impact of Scheme traffic on existing road links, including the A140, has been assessed in accordance with recognised industry guidance and established assessment methodologies. The Applicant therefore considers that the effects of construction traffic on the wider highway network have been assessed in line with relevant best practice.
LIR-SCC-030	Transport and Access	**A143-Bury St Edmunds to Scole** 7.6 This road runs in a mostly North East / South West trajectory between the town of Bury St. Edmunds and the A140 roundabout at Scole.	The Applicant acknowledges the concerns raised regarding the A143 corridor. The transport study area was developed in accordance with the IEMA Guidelines for Environmental Assessment of Traffic and Movement and is shown within **ES Volume 2,**

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		7.7 It passes through several villages including Great Barton, Stanton and Wortham with intermittent footways on either side of the carriageway, predominantly through the villages. There are very few formal pedestrian crossing points along its length. 7.8 The junction of Thurston Road with the A143 has a cluster of collisions (4 serious, 2 slight between 2021 and 2025 inclusive) which is a concern to the SCC and any increase in traffic particularly Heavy Goods Vehicles (HGVs) is of concern.	**Figure 11.1 – Indicative Transport and Access Study Area [APP-094]**. As set out in the Applicant's response to LIR-SCC-029, construction traffic associated with the Scheme is expected to dissipate within the wider highway network beyond the identified transport study area. The Applicant therefore considers that traffic associated with the Scheme on the A143 between Bury St Edmunds and Scole would be negligible in comparison to background traffic levels and that assessment of this route was not required.
LIR-SCC-031	Transport and Access	**AIL Routing – Port of Felixstowe to A140** 7.9 Within the CTMP (APP-201) 6.2.2 it is stated that 'AIL movements will utilise the Strategic Road Network (SRN) to reach the sites and CRC temporary construction compounds only using the Local Road Network (LRN) for the final part of the journey'. The applicant does not recognise that in terms of access from Felixstowe only the A14 forms part of the SRN with the A12, A140, A143 and A146 are part of the local road network, not SRN. As some of these	The Applicant has appointed abnormal load specialists Wynns who are aware of current issues along the specified road network and have conducted consultation outside of the ESDAL platform, working directly with relevant stakeholders and Local Highway Authorities. The DfT Water Preferred Policy requires for the nearest feasible ports to be considered. Felixstowe would only be considered should Ipswich be found unfeasible. Kings Lynn has been investigated in detail but there is an unsuitable structure along the route restricting access (Dunston Rail Bridge).

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		routes are the responsibility of SCC the authority is concerned about the lack of detail regarding AIL movement (CTMP 6.4.1 and 6.4.2) and that the Applicant has not demonstrated that access is feasible for this project. The Electronic Service Delivery for Abnormal Loads (ESDAL) process is binary and likely lead to a rejection if a structure on the route has insufficient capacity for a specific load. SCC would welcome the Applicants contribution towards a more robust process for assessing structures and where necessary remedying any capacity shortfall. 7.10 To date no discussions have occurred between the Applicant and SCC regarding suitability of practicality if AILs being routed from Felixstowe. Nor has the applicant confirmed National Highways have accepted Kings Lynn or Felixstowe as being ports that comply with its water borne policy. 7.11 There is a bridge at Brockford street on the A140 which requires overbridging for any AILs. Construction of the temporary bridge requires closure of the A140 for 24 hours, disrupting regional	Lowestoft is also not feasible due to multiple unsuitable structures along the onward road route. The overbridge solution was previously utilised as the structural assessment would not have been completed in time for the Scheme execution. The Applicant has instructed a structural assessment to be carried out providing a comparative assessment with confidence that the structure may have the capacity to accommodate the proposed loadings without or with less disruptive remedial works. It is understood that there may be a requirement for the structure to undergo repair/reconstruction depending on the outcome of this assessment. The Applicant and Wynns will continue dialogue with SCC on the matters raised.

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		and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Council's view, necessitate investigation and repair of this and potentially other structures.	
LIR-SCC-032	Transport and Access	7.11 There is a bridge at Brockford street on the A140 which requires overbridging for any AILs. Construction of the temporary bridge requires closure of the A140 for 24 hours, disrupting regional and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Council's view, necessitate investigation and repair of this and potentially other structures. 7.12 Any AILs leaving the port of Felixstowe will travel on the A14, which is under the purview of National Highways, up to the junction with the A140. Liaison with National Highways is	Please refer to response to LIR-SCC-031 above.

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		required with these loads as SCC does not have jurisdiction of the A14 and as such cannot comment on this road.	
LIR-SCC-033	Transport and Access	7.13 In terms of resilience SCC would expect that routes to substations from a suitable port will also be considered during the operational phase particularly if temporary works are used to gain access to these in the construction phase and therefore may not be available after completion of a substation.	The **Outline OTMP [APP-202]** sets out the framework for the management of operational traffic associated with the Scheme. In particular, Section 2.12.3 states that access to the Sites would be via the access routes defined for the construction phase. Where Abnormal Indivisible Loads (AILs) are required for the replacement of equipment, consultation would be undertaken and the necessary approvals sought from the relevant local planning and highway authorities. The Applicant therefore considers that operational access arrangements have been appropriately considered and that a suitable framework is in place for the management of operational traffic, including any future AIL movements.
LIR-SCC-034	Transport and Access	7.14 In summary, the proposed application will in the construction phase: • Result in a significant increase in HGV movements on the A140 and A143, particularly when considered in combination with other concurrent NSIPs.	The Applicant acknowledges the concerns raised regarding increased HGV movements, effects on the strategic highway network and the proposed AIL strategy. These matters are addressed in the Applicant's responses to LIR-SCC-004 and LIR-SCC-028 to LIR-SCC-033.

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		• Increase HGV movements on the A140 and A143, resulting in:
		  ○ Increased delay
		  ○ Reduced residual capacity
		  ○ Reduced attractiveness of the routes for users of sustainable transport, particularly cycling
		  ○ Increased severance in communities along the routes
		  ○ Increased wear and deterioration of road and structures due to the additional traffic
		• AIL access to the site from Felixstowe may not be feasible due to limitations in the capacity of highway structures.	