East Pye Solar

Applicant's Response to Submissions Received at Deadline 1 – Parish Councils, Non-Statutory Organisations and Elected Representatives

Revision 1

October 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/9.33

The Infrastructure Planning (Examination Procedure) Rules 2010

Contents

1 Introduction 1
1.1 Purpose of the document 1
1.2 Structure of the Report 1
2 The Applicant's Response to Deadline 1 Submissions Received from Parish and Town Councils, and Parish Meetings 5
2.1 Brooke Parish Council 5
2.2 Great Moulton Parish Council 34
2.3 Hedenham Parish Meeting 45
2.4 Hempnall Parish Council 53
2.5 Kirstead Parish Meeting 77
2.6 Long Stratton Parish Council 83
2.7 Morningthorpe and Fritton Parish Council 101
2.8 Saxlingham Nethergate Parish Council 126
2.9 Seething Parish Council 147
2.10 Shotesham Parish Council 155
2.11 Tivetshall Parish Council 178
2.12 Topcroft Parish Council 236
2.13 Wacton Parish Council 248
3 The Applicant's Response to Submissions Received by Non-Statutory Organisations at Deadline 1 265
3.1 CPRE Norfolk 265
3.2 Forncett Nature Matters 274
3.3 Great Moulton Action Group 286
3.4 Shotesham Action Group 292
3.5 Norfolk Wildlife Trust 310
4 The Applicant's Response to Deadline 1 Submissions from Elected Representatives 330
4.1 Adrian Ramsay MP 330
4.2 Cllr Margaret Thomas (Norfolk County Council West Depwade division) 344
4.3 Cllr Suzanne Wateridge 362
4.4 Cllr Karl Catchpole 374
4.5 Cllr Daniel Elmer 382

Tables

Table 1.1 List of Acronyms of Submission Documents 2
Table 1.2 Lists of Organisations whose Deadline 1 Submissions are Responded to in Section 2 2
Table 1.3 List of Organisations whose Deadline 1 Submissions are Responded to in Section 3 3
Table 1.4 List of Organisations whose Deadline 1 Submissions are Responded to in Section 4 4
Table 2.1 Applicant's response to Brooke Parish Council [REP1-428] 5
Table 2.2 Applicant's response to Great Moulton Parish Council [REP1-158] 34
Table 2.3 Applicant's response to Hedenham Parish Meeting [REP1-399] 45

Table 2.4 Applicant's response to Hempnall Parish Council [REP1-156], [REP1-383], [REP1-455] and [REP1-489] 53
Table 2.5 Applicant's response to Kirstead Parish Meeting [REP1-165] 77
Table 2.6 Applicant's response to Long Stratton Town Council [REP1-136] 83
Table 2.7 Applicant's response to Morningthorpe and Fritton Parish Council [REP1-235] and [REP1-435] 101
Table 2.8 Applicant's response to Saxlingham Nethergate Parish Council [REP1-234] and [REP1-442] 126
Table 2.9 Applicant's response to Seething Parish Council [REP1-273] 147
Table 2.10 Applicant's response to Shotesham Parish Council [REP1-181], [REP1-292] and [REP1-293] 155
Table 2.11 Applicant's response to Tivetshall Parish Council [REP1-157], [REP1-248], [REP1-294] and [REP1-474] 178
Table 2.12 Applicant's response to Topcroft Parish Council [REP1-236] and [REP1-381] 236
Table 2.13 Applicant's response to Wacton Parish Council [REP1-295] 248
Table 3.1 Applicant's Response to CPRE Norfolk [REP1-430] 265
Table 3.2 Applicant's Response to Forncett Nature Matters [REP1-298] 274
Table 3.3 Applicant's Response to Great Moulton Action Group [REP1-447] 286
Table 3.4 Applicant's Response to Shotesham Action Group [REP1-292] 292
Table 3.5 Applicant's Response to Norfolk Wildlife Trust [REP1-404] 310
Table 4.1 Applicant's Response to Adrian Ramsay MP [REP1-184] 330
Table 4.2 Applicant's Response to Cllr Margaret Thomas [REP1-251] and [REP1-436] 344
Table 4.3 Applicant's Response to Cllr Suzanne Wateridge [REP1-267] 362
Table 4.4 Applicant's Response to Cllr Karl Catchpole [REP1-358] 374

1 Introduction

1.1 Purpose of the document

1.1.1 This document provides the Applicant's response to all relevant documents submitted by parish councils, non-statutory parties and elected representatives at Deadline 1. This includes Written Representations (WRs), comments on the Applicant's responses to Relevant Representations, and post hearing submissions.

1.1.2 The Applicant has submitted separate documents alongside this document responding to other relevant submissions at Deadline 1. These include:

- **The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies [EN0110014/EXAM/9.29]**
- **The Applicant's Response to the Local Impact Reports [EN0110014/EXAM/9.30]**
- **The Applicant's Comments on Responses to Examining Authority's First Written Questions [EN0110014/EXAM/9.31]**
- **The Applicant's Response to Submissions Received at Deadline 1 – Members of the Public [EN0110014/EXAM/9.34]**
- **The Applicant's Response to Block East Pye Solar's Deadline 1 Submissions [EN0110014/EXAM/9.35]**

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 **Contents, Glossary and Abbreviations [APP-036]**.
- **Table 1.2** lists all Deadline 1 submissions from parish and town councils, and parish meetings. These responses are responded to in full in **Section 2** of this document.
- **Table 1.3** lists all Deadline 1 submissions from non-statutory organisations. These responses are responded to in full in **Section 3** of this document.
- **Table 1.4** lists all Deadline 1 submissions from elected representatives. These responses are responded to in full in **Section 4** of this document.

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

Table 1.2 Lists of Organisations whose Deadline 1 Submissions are Responded to in Section 2

Examination Library Reference	Acronym	Submission Received From	Plot numbers (if applicable)
REP1-136	LSTC	Long Stratton Town Council	N/A
REP1-156 REP1-383	HPC	Hempnall Parish Council	N/A

Examination Library Reference	Acronym	Submission Received From	Plot numbers (if applicable)
REP1-455 REP1-489			
REP1-157	TPC	Tivetshall Parish Council	N/A
REP1-158	GMPC	Great Moulton Parish Council	N/A
REP1-165	KPM	Kirstead Parish Meeting	N/A
REP1-181 REP1-293	SPC	Shotesham Parish Council	N/A
REP1-234 REP1-442	SNPC	Saxlingham Nethergate Parish Council	03-001, 03-002
REP1-235 REP1-435	MFPC	Morningthorpe and Fritton Parish Council	N/A
REP1-236	ToPC	Topcroft Parish Council	N/A
REP1-157 REP1-248 REP1-294 REP1-474	TPC	Tivetshall Parish Council	N/A
REP1-273	SePC	Seething Parish Council	N/A
REP1-295	WPC	Wacton Parish Council	N/A
REP1-399	HePC	Hedenham Parish Meeting	N/A
REP1-428	BPC	Brooke Parish Council	N/A

Table 1.3 List of Organisations whose Deadline 1 Submissions are Responded to in Section 3

Examination Library Reference	Acronym	Submission Received From
REP1-292	SAG	Shotesham Action Group
REP1-298	FNF	Forncett Nature Matters
REP1-430	CPRE	CPRE Norfolk
REP1-447	GMAG	Great Moulton Action Group
REP1-404	NWT	Norfolk Wildlife Trust

Table 1.4 List of Organisations whose Deadline 1 Submissions are Responded to in Section 4

Examination Library Reference	Acronym	Submission Received From
REP1-184	AR	Adrian Ramsay MP
REP1-251 REP1-436	MT	Cllr Margaret Thomas
REP1-267	SW	Cllr Suzanne Wateridge
REP1-358	KC	Cllr Karl Catchpole
REP1-452	N/A	Cllr Daniel Elmer

2 The Applicant's Response to Deadline 1 Submissions Received from Parish and Town Councils, and Parish Meetings

2.1 Brooke Parish Council

Table 2.1 Applicant's response to Brooke Parish Council [REP1-428]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BPC-001	Need for the Scheme Site Selection, Alternatives and Design Evolution	The Council supports the transition to renewable energy in principle. Its position is that Site 9 cannot be judged solely by the solar-panel footprint, because the effects experienced locally would also arise from cable corridors, access works, internal haul roads, construction compounds, HGV and Abnormal Indivisible Load movements, highway alterations, vegetation clearance, drainage works and operational traffic.	The Applicant notes Brooke Parish Council's in principle support for renewable energy. The Scheme will help the UK to be on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply and providing low-cost electricity to meet the increasing demand. The overall greenhouse gas emissions impact of the operation of the Scheme is beneficial and significant. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need** confirms that the need for the Scheme is urgent and that substantial weight

ID	Theme	Comments/Issues Raised	Applicant's Response
			should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The Applicant notes the concerns raised by Brooke Parish Council regarding cable corridors, access works, internal haul routes, HGV and Abnormal Indivisible Load movements (AIL), highway alterations, vegetation clearance, drainage works and operational traffic. Detailed responses have been provided to each of these issues herein.
WR-BPC-002	Site Selection, Alternatives and Design Evolution	Site 9 is a particularly sensitive location because development is close to homes and is associated with valued rural views, heritage assets, ecological corridors, a primary school, narrow historic roads, agricultural land, local businesses and recreational users.	Environmental constraints in proximity to Site 9 have been considered as appropriate within the **ES [APP-036 to APP-195],** specifically: • Rural views and visual impacts to PRoW users – **ES Chapter 7 – Landscape and Visual [APP-043]**; • Heritage assets – **ES Chapter 10 – Cultural Heritage [APP-046]**; • Ecological corridors – **ES Chapter 8 – Ecology and Biodiversity [APP-044]**; • Primary school and local road network, and impacts to PRoWs – **ES Chapter 11 – Transport and Access [APP-047]**; • Agricultural land – **ES Chapter 15 – Soils and Agricultural Land [APP-051]**;

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Local businesses – **ES Chapter 14 – Socio-Economics [APP-050]**; and • Health and recreation – **ES Chapter 18 – Other Environmental Matters [APP-054]**.
WR-BPC-003	Scheme Description EIA Methodology	The Council's central concern is uncertainty. Final construction access, cable and AIL arrangements are not sufficiently fixed in the material reviewed; the cumulative vegetation loss is not presented in one plan; and the ecological baseline is questioned because substantial hedgerow and tree clearance is reported before or around survey activity.	The Applicant notes the concerns raised regarding the level of design certainty for Site 9. The Scheme has been assessed using the Rochdale Envelope approach, with the maximum parameters secured through the **Design Principles, Parameters and Commitments [REP1-078]** and Requirement 5 of the **Draft DCO [REP1-014]**. The Environmental Statement assesses the reasonable worst-case scenario within these parameters, with the final detailed design required to remain within the assessed envelope. In relation to construction access and cable infrastructure, the Scheme and associated works are described in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, with the authorised development identified in Schedule 1 of the **Draft DCO [REP1-014]**. The Cable Route Corridor provides the area within which the underground cables would be installed and includes flexibility for detailed design and temporary construction compounds.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant has also assessed the effects of construction traffic on the local highway network within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**. The ES **[APP-036 to APP-195]** sets out the environmental baseline that underpins the EIA. The Applicant does not agree that uncertainty regarding the detailed design means that the environmental effects of the Scheme have not been adequately assessed. The **Works Plans [REP1-005 - 006]** establish the areas within which works may take place, while the **Design Principles Parameters and Commitments [REP1-078]** establishes parameters and offsets that form the basis of the environmental assessment.
WR-BPC-004	Scheme Description EIA Methodology	Brooke Parish Council asks the Examining Authority to require a consolidated and defensible assessment of the whole Site 9 development package before reaching a conclusion on acceptability.	The environmental impacts of the Scheme, including Site 9, have been assessed fully and are reported within the relevant technical chapters of the **ES [APP-042 to APP-056].**

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BPC-005	Cumulative Effects, In-Combination Impacts	The Council considers the relevant development to include the approximately 150-acre solar parcel and every associated element required to make it constructible and operational. The parcel begins approximately 4–10 metres from the boundaries of at least seven homes. Proposed construction routes surround the parcel and converge around homes, Brooke Primary School, listed buildings, narrow rural lanes, ecological corridors and agricultural land. Assessment by separate topic or work package risks understating combined effects. The Council asks for one integrated cumulative assessment covering Site 9, its associated infrastructure, Sites 7–10 and the wider East Pye Solar scheme, testing realistic worst-case combinations and overlapping construction periods.	All topics chapters within the Environmental Statement consider the project as a whole, as defined in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. The in-combination effects between the significant effects identified in individual topic chapters in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055]**. As such, all effects at any given location are considered holistically.
WR-BPC-006	Human Health Landscape and Visual	Issues raised by residents include construction noise and activity, lighting, loss of screening, operational maintenance, glare, traffic, changes to views, disturbance to horses and disruption to confidential work calls.	The Applicant acknowledges the concerns raised. The matters identified by the Council have been considered, where relevant, through the topic-specific assessments undertaken as part of the Environmental Statement, including **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**,

ID	Theme	Comments/Issues Raised	Applicant's Response
		Personal statements report stress, anxiety, uncertainty and concern about retirement plans, livelihoods and the loss of valued countryside. The Council requests a proportionate community wellbeing assessment.	**Chapter 11 – Transport and Access [APP-047]** and **Chapter 12 – Noise and Vibration [APP-048]**. Relevant mitigation and management measures are set out within the Environmental Statement and associated management plans and secured through the **Draft DCO [REP1-014]**. The Applicant also acknowledges the personal accounts submitted by local residents describing stress, anxiety, uncertainty, concerns regarding retirement plans and livelihoods, and the perceived loss of valued countryside and rural character. Potential effects on health and wellbeing have been assessed within the Human Health Summary Statement contained in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**. The assessments acknowledge that issues such as access to nature, visual change, attachment to place, community safety concerns and wider perceptions of change may influence wellbeing. However, taking account of the magnitude, duration and extent of the predicted effects, together with the embedded mitigation and management measures, the Human Health Summary Statement and Equality Impact Assessment conclude that significant adverse effects on human health, mental wellbeing or equality groups are not expected at a population level (see section 9 of the **Equality Impact**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Assessment [APP-214] and sections 18.6.250 to 18.6.266 of the Human Health Summary Statement). In response to issues raised during the Examination regarding resident wellbeing, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107].** The Addendum provides further consideration of matters including uncertainty, place attachment, access to nature, social participation and cumulative wellbeing effects. It supports the conclusions of the submitted assessments, finding that significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups, while recognising the importance of ongoing community liaison and communication throughout construction.
WR-BPC-007	Electromagnetic Fields	The Council asks the Applicant to provide clear, accessible evidence of anticipated electromagnetic field levels, relevant health-protection standards, separation distances, cumulative exposure assumptions and how residents' concerns have been addressed.	The Applicant has used clear and evidenced findings by National Grid to assess the specific infrastructure proposed as part of the Scheme. The information is accessible via the EMFS.info website. The anticipated electromagnetic field levels, health-protection standards, separation distances and cumulative considerations are presented in **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**. Residents' concerns are addressed by considering the separation distance between the infrastructure

ID	Theme	Comments/Issues Raised	Applicant's Response
			and receptors for human health and expected field strengths which shows that there would be a negligible effect.
WR-BPC-008	Socio-Economics	Residents report concern about property marketability, value, holiday-let viability and retirement security. The Council requests assessment of effects on Brooke View Barns and other hospitality, tourism, rental and equestrian businesses whose offer depends on rural views, tranquillity and access.	The Applicant refers to the response provided to BPC-026 in **The Applicants Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]** in relation to property values; this confirms that compensation is not available for loss of value due to visual impacts or diminished views, however empirical evidence does not indicate that solar farms have such an effect. **ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects. There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be compensated either by agreement or in accordance with the compensation code.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BPC-009	Landscape and Visual	The open agricultural landscape around Brooke contributes to local identity, long views, settlement character and the relationship between Brooke and its rural setting. The proposed arrays, fencing, cameras, cabling and associated equipment would introduce extensive energy infrastructure into that landscape.	The Applicant notes the consultees comment. The Applicant agrees that Brooke is a historic rural village whose setting is defined by the surrounding agricultural landscape of South Norfolk. The Scheme would introduce solar arrays and associated infrastructure into part of the agricultural landscape that contributes to the wider rural setting of Brooke. The change would result in the loss of a proportion of the existing agricultural character within the affected part of the landscape and would alter the experience of openness in views towards Site 9. However, the effect would be confined to a limited component of Brooke's overall setting. The majority of the settlement's rural context, including its historic core, the Church of St Peter, surrounding countryside, mature hedgerow network, woodland structure and principal rural approach routes, would remain unaffected. Consequently, whilst the Scheme would influence part of the village's wider landscape setting, it would not fundamentally alter Brooke's identity as a historic rural village set within an agricultural landscape.
WR-BPC-010	Landscape and Visual	The Council is concerned about reliance on existing trees and hedgerows for screening. The assessment should	The **Design Approach Document [APP-212]** confirms an environmentally led approach, where infrastructure has been progressively refined to

ID	Theme	Comments/Issues Raised	Applicant's Response
		include winter photomontages, leaf-off views, seasonal visualisations and reduced-screening scenarios over the full operational life of the project.	avoid, reduce and mitigate potential effects on landscape character, ecology, heritage assets, flood risk, agricultural land, recreation and residential amenity. It does not purely rely in existing vegetation for screening. In summary the design approach includes a series of Project Level Design Principles which consider the local environment, policies and guidance such as the Clayland Initiative led by the Norfolk Wildlife Trust, and Natural England's National Character Areas Statement of Environmental Opportunities, alongside feedback from stakeholders and consultees. These factors where embedded into the design decision making and its evolution to promote Good Design. These principles include commitments such as: • Retaining and enhancing hedgerows, woodland and ponds. • Protecting Public Rights of Way through minimum setbacks. • Increasing offsets around ancient woodland, heritage assets and residential properties. • Removing solar arrays from particularly sensitive locations, flood-prone areas and some areas of Best and Most Versatile agricultural land.

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Creating new habitat corridors, woodland belts, permissive paths and community spaces. The **Green Infrastructure Strategy [REP1-013]** goes further and presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. This includes identification of existing features (some of which are proposed for enhancement), alongside areas for mitigation and enhancement on which the Environmental Impact Assessment relies. The Applicant would highlight that following statutory consultation feedback, Solar PV Arrays were removed entirely from the western part of Site 9 owing Brooke Conservation Area to the north and residential properties bordering the southern Order Limits on Mill Lane. A range of supporting visualisations have been included in the Application from various agreed view locations. These include: • Photowires (LI TGN 06/19 Type 3) to demonstrates the size, scale and degree of visibility of the proposals in the views. These outputs utilise winter baseline photography (to demonstrate visibility when vegetation is

ID	Theme	Comments/Issues Raised	Applicant's Response
			typically out of leaf). The visualisations will set out the maximum parameter of the Scheme in the view. • Photomontages Year 1 (LI TGN 06/19 Type 3) to demonstrate the size, scale, degree of visibility and appearance of the Scheme in views. These are photo realistic outputs based on winter baseline photography to showcase the scheme at opening once the Scheme is fully built out, prior to landscape mitigation measures establishing. The photorealistic outputs are based on the illustrative concept layouts (which align with the maximum parameters) and provide a illustrative representation the Schemes appearance. In addition to the photorealistic elements the maximum parameter of the Scheme (represented by a single-coloured outline) is also set out in the view. • Photomontages Year 15 (LI TGN 06/19 Type 3) to demonstrate the size, scale, degree of visibility and appearance of the Scheme in views. These are photo realistic outputs based on the summer baseline photography to showcase the scheme 15 years following opening, and representative of the Scheme one proposed landscape mitigation measures (as shown on Figure 7.11 Landscape

ID	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation Figure [EN0110014/APP/6.2.7.11]) have established and are likely to be providing the function for which they are included (and therefore representative of a mitigated scenario). The photorealistic outputs will be based on the illustrative concept layouts which align with the maximum parameters and therefore will provide an illustrative representation of how the Scheme could appear. For Site 9 these are presented in **ES Volume 3, Appendix 7.6 - Visualisations – Site 9 [APP-145].**
WR-BPC-011	Landscape and Visual	Sensitive viewpoints include properties and land immediately adjoining Site 9, Brooke View Barns, Brooke and Kirstead Conservation Area, public rights of way, Brooke Primary School, Woods and approaches along High Green, Honeypot Lane, Littlebeck Lane, Mill Lane and Woodton Road.	The Applicant notes the comments. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** includes a number of agreed view locations which have informed the LVIA, including from Mill Lane / Brooke View Barns (VL2 – Site 9), PRoW Br-FP6 (VL1, and VL5 Site 9), Woodton Road (VL 3-Site 9), Littlebeck Lane (VL6-Site). Brooke Conservation Area is considered in **ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]**. Brooke Primary School is located on High Green and as demonstrated by **ES Volume 2, Figure 7.5.3 Zone of Theoretical Visibility Site 9 [REP1-032]** is outside the visual envelope of the Scheme.
WR-BPC-012	Glint and Glare	The Council supports a transparent scheme-specific glint and glare	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		assessment of receptors, seasonal and daily conditions, road users and nearby homes, with mitigation secured where effects are identified.	
WR-BPC-013	Cultural Heritage	The Council considers that the agricultural setting is part of the significance and experience of the Brooke and Kirstead Conservation Area and is concerned that reliance on existing vegetation may understate harm to the setting of the Conservation Area and nearby listed buildings. The Applicant should demonstrate that reasonable heritage-led alternatives were considered, layout changes to reduce effects were fully explored and specific mitigation was incorporated where appropriate.	The Applicant refers to its response to BPC-010 and BPC-018 in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**.
WR-BPC-014	Cultural Heritage	Heritage assessments should include repeated HGV and AIL movements, highway widening, passing places, loss of verges or vegetation, changes to historic road character and the combined effect of construction infrastructure and solar development.	The Applicant refers to its response to BPC-019 in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BPC-015	Ecology and Biodiversity	The Council requests assessment of the connected ecological network involving hedgerows, a natural pond, Six Acre Plantation, Brooke Wood, other woodland, farmland and smaller stepping-stone habitats as a whole.	Habitats both within the Order Limits and those within with wider ecological network including a linear ecological network has been assessed for the potential effects of the Scheme during construction, operation, and decommissioning is set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Embedded design principles are detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows / ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the **Outline LEMP [REP1-064]**. When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced connectivity through the site.

ID	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the above-named documents also include commitments to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby resulting in extensive landscape-wide habitat provision for the benefit of local species.
WR-BPC-016	Ecology and Biodiversity	The Site 9 material reports that approximately 1,565 metres of hedge and trees were cut to ground level in March 2024 and approximately 990 metres of regrowth were cut in September 2024. These reported facts require verification through records, photographs, survey data and the Applicant's evidence. The ditch associated with the hedge has been filled in, representing loss of valuable aquatic habitat, and the Council asks whether this has been included in ecology surveys and BNG calculations. Any ecological baseline and Biodiversity Net Gain calculation should transparently state whether it uses pre-clearance or post-clearance conditions and explain the implications.	Regarding the hedgerow removal on Site 9. The Applicant understands that a Higher Tier BN6 Countryside Stewardship Scheme exists at the site. The Applicant does not have control over actions undertaken independently by individual landowners, who are required to ensure that they secure any necessary approvals or consents for any such works. 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]**. This aligns with the threshold set out in the latest BNG guidance for

ID	Theme	Comments/Issues Raised	Applicant's Response
		Biodiversity commitments should be measurable and enforceable, with monitoring intervals, success criteria, management actions, replacement obligations, reporting arrangements and corrective triggers extending across construction, operation and decommissioning.	NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026. In reference to the comment regarding whether the BNG assessment uses pre-clearance or post-clearance conditions in the metric calculation process. It is understood that coppicing /hedgerow works were permitted on the land under a Higher Tier BN6 Countryside Stewardship Scheme, and in no way connected to the Scheme. As these actions are associated with a current land management agreement, post clearance habitat values have been used to inform the BNG assessment. The **Green Infrastructure Strategy [REP1-013]** (as secured within **the Outline LEMP [REP1-064]**) includes the reinstatement of lost hedgerows at this location. 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 [REP1-013]** 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 (see above).

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BPC-017	Transport and Access	The Council considers construction transport to be a central part of the Site 9 impact. The final HGV and AIL strategy needs to be fixed and examined. High Green passes Brooke Primary School and the Farm Shop complex, includes parked vehicles, narrows beyond Astley Cooper Place and lacks footways and passing places in relevant sections. It is used by schoolchildren, pedestrians, cyclists, horse riders and horse-drawn vehicles. A specific assessment is requested for school travel, cycle training, school coaches, emergency access and the school's use of Wishing Wood, including periods of peak construction activity.	The Applicant acknowledges the concerns raised regarding Site 9 and the potential interaction between construction traffic and other users of the local highway network. The Applicant can confirm that Site 9 will be accessed via Littlebeck Lane and not through Brooke. AIL vehicles are also not required for Site 9. The effects of construction traffic on the local highway network have been assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to maintain safe access for all highway users during construction. Further detail regarding traffic management measures and access arrangements would be provided within the detailed Construction Traffic Management Plan secured through the DCO requirements and agreed with the Local Highway Authority.
WR-BPC-018	Transport and Access	Littlebeck Lane and Woodton Road are described as single-track, without passing places, with ditches, listed buildings, roadside habitat and use by walkers, cyclists and equestrians.	The Applicant acknowledges the description of Littlebeck Lane and Woodton Road. The suitability of these routes for construction traffic has been assessed as part of the transport assessment process and informed the development

ID	Theme	Comments/Issues Raised	Applicant's Response
			of the construction traffic routing strategy and associated mitigation measures. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to minimise impacts on local roads and other users of the highway network, including pedestrians, cyclists and equestrians. The Applicant notes that the characteristics of these routes, including their rural nature and use by a range of highway users, were considered in the development of the construction traffic strategy and associated mitigation measures.
WR-BPC-019	Transport and Access	The Council requests definitive HGV and AIL routes, movement numbers, timing and vehicle specifications; road-by-road swept-path, safety, capacity and accessibility assessment; controls for school times; and emergency access arrangements.	The Applicant notes the concerns raised regarding HGV and AIL routes, construction traffic management and access arrangements. **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed HGV and AIL routes to the Scheme. Construction traffic numbers assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]** form the basis of the transport assessment. Section 6 of the **Outline CTMP [REP1-068]** sets out the framework for the management of construction traffic and AIL movements, including the safety

ID	Theme	Comments/Issues Raised	Applicant's Response
			measures that would be implemented to facilitate these movements. Further detail regarding routing, traffic management measures, emergency access arrangements and the management of construction traffic would be provided within the detailed Construction Traffic Management Plan, secured through the DCO requirements. The Applicant therefore considers that sufficient information has been provided to assess the effects of construction traffic and AIL movements at this stage of the consenting process. Further detail will be provided through the detailed Construction Traffic Management Plan subject to approval by the relevant planning and highway authorities pursuant to Requirement 15 of the **Draft DCO [REP1-014]**.
WR-BPC-020	Scheme Description	Site 9 should not be treated as acceptable until its final cable route and full working corridor are established and assessed.	The Order Limits width of the CRC is typically 50m, with the Order Limits narrowing in places to approximately 13m owing to environmental constraints and widening in places up to 405m to allow flexibility for detailed design and temporary construction compounds. The exact location of the Grid Connection Cables within the Cable Route Corridor will be determined at the detailed design stage. For assessment purposes within the EIA, the Rochdale Envelope approach has been utilised to assess a reasonable worst case, and the placing of

ID	Theme	Comments/Issues Raised	Applicant's Response
			the cable anywhere within the Cable Route Corridor has been considered unless detailed otherwise.
WR-BPC-021	Scheme Description	The Council requests plans showing joint bays, compounds, crossing methods, working widths, soil storage, dewatering, access and reinstatement.	The Applicant notes this comment. An image of a typical joint bay is provided in **ES Volume, 1 Chapter 4 The Scheme [REP1-022]**; compounds, crossing methods and working widths can be found in **ES Volume 3, Appendix 4.1 - Illustrative Technical Information [REP1-044]**; soil storage is addressed in the **Outline SRMP [APP-204]**; access is addressed **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]**.
WR-BPC-022	Water Environment – Water Quality, Drainage and Flood Risk	The Site 9 material reports variable flood risk, land within Flood Zone 3, surface-water flooding, clay soils, land gradients and runoff from panel areas. The Council requests a cumulative drainage assessment addressing arrays, cable trenches, access and haul roads, soil compaction, vegetation clearance, compounds and highway works, including effects on neighbouring land.	The Applicant refers to its response to BPC-017 in **The Applicant's Response to Relevant Representations Part - Parish and Town Councils, Parish Meetings and MPs [PDA-011]** in relation to the first paragraph of this comment. The Applicant understands the Respondent's request for a cumulative drainage assessment as the effect on receptors from the multiple elements of the Scheme from a drainage perspective (i.e. cumulative effect could occur if elements do not have surface water management measures in place) and addresses each element in turn below: • Arrays – the Arrays will be raised up above the ground on narrow supports at an appropriate freeboard above ground level/anticipated flood depths with natural

ID	Theme	Comments/Issues Raised	Applicant's Response
			grass cover beneath and therefore the existing drainage regime will be maintained and potentially improved through increased ground roughness all year round; • Cable trenches – these will be limited to areas outside of flood risk areas and will represent a narrow area. Once cable installation is complete, the ground will be reinstated to existing levels; • Access and haul roads – these elements will have surface water management measures (swales or filter drains); • Soil compaction – vehicle movements will be restricted to compounds and internal haul routes to minimise soil disturbance/compaction during construction and decommissioning. • Vegetation clearance – this will be limited and will not have a significant impact on existing drainage regimes; • Highway works – this will be minimal, and would incorporate surface water management measures where required; • Impact on neighbouring land – with the inclusion of the above mitigation, it is considered that the Scheme will not increase

ID	Theme	Comments/Issues Raised	Applicant's Response
			surface water flood risk within the Order Limits or to neighbouring land and any cumulative effect in relation to surface water drainage is 'Not Significant'. The embedded mitigation measures outlined above are secured within the **Design Principles Parameters and Commitments [REP1-078]**, the **Outline LEMP [REP1-064]**, the **Outline CTMP [REP1-068]**, the **Outline SRMP [APP-204]**, the **Outline CEMP [REP1-058]** and the **Outline DEMP [REP1-062]**.
WR-BPC-023	Soils and Agricultural Land	Site 9 is identified as Grade 3/3A Best and Most Versatile agricultural land. The planning balance should consider cable trenching, compounds, haul roads, storage, compaction, drainage change and the quality of restoration as well as the array footprint. The Council asks for clear evidence on the duration of land take, continued agricultural use where proposed, soil protection, decommissioning, restoration standards and the security required to ensure delivery.	Site 9 has been found to be approximately 50% Subgrade 3b (non-BMV) and 50% Subgrade 3a (BMV). Site 9 is proposed for mitigation and enhancement with panels located on the eastern side as shown in **Works Plan Part 1 [REP1-005]** and **Design Principles, Parameters and Commitments [REP1-078]**. There is no permanent land take proposed within Site 9, the scheme is proposed to be decommissioned after 60 years. Decommissioning is outlined in the **Outline SRMP [APP-204]**. The **Outline SRMP [APP-204]** sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014]**. The **Outline SRMP [APP-204]** provides the structure and the types of controls to be

ID	Theme	Comments/Issues Raised	Applicant's Response
			included within the detailed SRMP. The outline SRMP sets out an outline of the matters that need to be defined or secured. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade.
WR-BPC-024	Public Rights of Way	Public rights of way and rural lanes support walking, cycling, equestrian use and access to green space. The Council requests assessment of severance, safety, temporary closures, loss of tranquillity and user experience.	**ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the visual amenity effects on the PRoW as a receptor including sequential effects, with affected length of PRoW and direction of travel considered where required. Mitigation measures and management of traffic and access are set out in the **Outline CTMP [REP1-068]** and the **Outline OTMP [APP-202]** and the management of PRoW is described in the **Outline PRoWPPMP [APP-203]** to minimise impacts as far as practicable. These outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. Detailed CTMP, OTMP and PRoWPPMP will be submitted to and approved by

ID	Theme	Comments/Issues Raised	Applicant's Response
			the relevant planning authority in accordance with Requirements 15, 16 and 17 of the **Draft DCO [REP1-014]**.
WR-BPC-025	Consultation and Engagement	The Council reports that consultation representatives were often unable to answer detailed questions about local heritage, ecology, rights of way, drainage and community impacts and asks whether local knowledge was captured early enough to influence design.	The Applicant refers to its responses provided under comment ID CON-004 in T**he Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. In addition to this, the Applicant met with and provided responses to individuals and community groups throughout the pre-application process. The Applicant maintained a series of free-to-use communication channels (phone, post and email) through the pre-application period. These channels were publicised throughout the Applicant's literature (such as newspaper adverts and press releases, on the project website, and on consultation materials including leaflets and posters). The Applicant welcomed enquiries and feedback from any Interested Party through these channels.
WR-BPC-026	Draft DCO EIA Methodology	A recurring concern is that conclusions depend on mitigation whose design, durability or enforceability is not sufficiently demonstrated. The DCO and management plans should define outcomes, responsibilities, monitoring, reporting and corrective action.	The outline management plans establish a framework for the details to be secured through the DCO Requirements. The specificity will be provided in the detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where

ID	Theme	Comments/Issues Raised	Applicant's Response
		Any consent should secure protection and maintenance of retained trees, hedges, ponds, ditches and habitats; replacement planting; noise, lighting, dust and working-hour controls; drainage inspection; independent monitoring; remediation triggers; and decommissioning and soil restoration.	specified in the **Draft DCO [REP1-014]**. The approval of the detailed management plans is secured by the Requirements in the **Draft DCO [REP1-014].** Paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is Mitigation and control measures for noise, lighting dust, working hours, water environment, and ground conditions are provided within the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]**, and the **Outline DEMP [REP1-062]**. Measures for the management and handling of soils, including the reinstatement of soils, are described in the **Outline SRMP [APP-204].** Maintenance of retained and proposed landscaping is secured through the **Outline LEMP [REP1-064]**.
WR-BPC-027	Summary of concerns	The Council requests a definitive Site 9 construction access plan, final internal haul-road and CRC8 arrangement, definitive cable route and temporary	The Applicant notes the request for additional information regarding Site 9 access arrangements,

ID	Theme	Comments/Issues Raised	Applicant's Response
	Ecology and Biodiversity Transport and Access Scheme Description	areas, and a single plan quantifying all hedge, tree, verge and habitat loss.	haul roads, cable routes and associated environmental effects. The Applicant can confirm that Site 9 will be accessed via Littlebeck Lane. **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed construction traffic routes to the Scheme. The effects of construction traffic on the local highway network have been assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to maintain safe access for all highway users during construction.
WR-BPC-028	Landscape and Visual	The Council requests winter, leaf-off and worst-case visual assessment, a heritage-led design review, a definitive HGV forecast and AIL route, road-by-road assessment of local lanes, and specific assessment of Brooke Primary School.	The Applicant notes the concerns raised regarding Site 9 access arrangements, HGV and AIL routing, and the extent of associated construction works. In respect of landscape-related queries, please refer to the Applicant's response to WR-BPC-010. **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed HGV and AIL routes to the Scheme. Construction traffic forecasts and a road-by-road assessment of local lanes are provided **ES Volume**

ID	Theme	Comments/Issues Raised	Applicant's Response
			1, Chapter 11 – Transport and Access [APP-047] and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]** and form the basis of the transport assessment. The assessment of individual highway links took account of local characteristics, including the presence of vulnerable users, educational facilities, pedestrians, cyclists and equestrians, when determining receptor sensitivity and the significance of effects. The effects of construction traffic on schools has therefore been assessed as part of the Environmental Statement.
WR-BPC-029	Water Environment	The Council requests cumulative flood-risk and drainage assessment, agricultural land and soil management assessment, assessment of local businesses and equestrian receptors, community wellbeing assessment and enforceable monitoring and decommissioning requirements.	The Applicant refers the Council to the response for WR-BPC-022. Each topic chapter within **ES Volume 1, Chapters 6-18 [APP-042 to APP-054]** sets out how the particular topic area has considered and assessed the cumulative effects (additive effects from other developments) arising as a result of other existing or proposed development. An in-combination effects assessment (from different environmental topics on one particular receptor) are presented in **ES Chapter 19 – In Combination Effects Assessment [APP-055]**. The **Draft DCO [REP1-014]** and supporting management plans, notably the **Outline DEMP**

ID	Theme	Comments/Issues Raised	Applicant's Response
			[REP1-062], provide legally enforceable monitoring and decommissioning requirements for the Scheme.
WR-BPC-030	Concluding remarks	Until final access, cable and AIL arrangements are established; vegetation loss is fully quantified; ecological, heritage, landscape, transport, drainage, agricultural and amenity effects are comprehensively assessed; and effective long-term mitigation is secured, Brooke Parish Council considers that Site 9 should not be treated as environmentally acceptable or transport-deliverable.	The Applicant has addressed these matters throughout its responses to WR-BPC-001 to WR-BPC-029.

2.2 Great Moulton Parish Council

Table 2.2 Applicant's response to Great Moulton Parish Council [REP1-158]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-GMPC-001	Need for the Scheme Site Selection, Alternatives and Design Evolution	Great Moulton Parish Council wishes to formally record its objection to the proposed East Pye Solar development. The Parish Council supports renewable energy and the transition to cleaner forms of electricity generation. Its objection is not to solar energy in principle; its concern is the scale, location and cumulative impact of this particular development and whether the application has demonstrated that a scheme of this size can be accommodated in this part of rural South Norfolk without unacceptable harm. The question should not simply be whether additional renewable electricity generation is desirable nationally. The Examination should also consider whether committing substantial areas of agricultural land to a development of this scale, in this particular location and for the proposed duration, represents an appropriate balance between energy	The Applicant notes Great Moulton Parish Council's support for renewable energy and the transition to cleaner forms of electricity generation. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. In terms of the planning balance, and as set out in the **Planning Statement [REP1-074]** with the critical

ID	Theme	Comments/Issues Raised	Applicant's Response
		security, environmental protection and food security. Achieving the transition towards cleaner energy does not remove the need to demonstrate that individual developments are appropriately located, proportionate, environmentally acceptable and properly balanced against other national and local priorities, including domestic food production. On the information presently available, Great Moulton Parish Council does not consider that the case has been made for granting development consent for East Pye Solar in its current form.	and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse effects identified, including impacts to agricultural land, are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.
WR-GMPC-002	Need for the Scheme Site Selection, Alternatives and Design Evolution	The Applicant's documentation identifies approximately 196.4 hectares associated with Sites 1, 2 and the BESS area around Great Moulton. This equates to approximately 485 acres and is equivalent to around 35% of the entire geographical area of Great Moulton parish. The proposed development around the community is not limited to solar panels. The wider scheme includes battery energy storage, major project substations, grid connection infrastructure and a new	The potential environmental effects of the scheme have been assessed within the relevant technical chapters of the **ES [APP-042 to APP-054]** considering all aspects of the Scheme together as set out in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. The Applicant refers to WR-GMPC-005 which addresses rural character and landscape.

ID	Theme	Comments/Issues Raised	Applicant's Response
		National Grid substation, together with associated highways, access, drainage, fencing and other works. This is not a minor development on the edge of the village. It represents a substantial and long-term change to the landscape and environment in which residents live. Individual solar fields, substations, battery infrastructure, pylons, cable routes, highway works and other elements should not be viewed in isolation where their combined effect is the transformation of a substantial area of rural landscape.	
WR-GMPC-003	Cumulative Effects, In-Combination Impacts Aviation (Tibenham)	The effects of East Pye Solar cannot reasonably be considered by reference to Great Moulton alone. Neighbouring rural communities, including Tivetshall, Wacton, Aslacton and Tibenham, will experience impacts associated with the development and its infrastructure. These villages are closely connected communities. They share local roads, facilities, countryside and public rights of way, and the effects of construction traffic, highway works, landscape change, noise, drainage, loss of agricultural character	All topics chapters within the Environmental Statement consider the project as a whole, as defined in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. The in-combination effects between the significant effects identified in individual topic chapters in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055**]. As such, all effects at any given location are considered holistically. The receptors assessed within the ES are defined on a topic-specific basis and set out within the respective topic chapters **[APP-042 to APP-056]**. Relevant receptors within settlements and

ID	Theme	Comments/Issues Raised	Applicant's Response
		and major energy infrastructure do not stop at parish boundaries. The Examining Authority should consider the effects upon these communities collectively as well as individually. What may appear to be a limited effect when considered against one individual settlement can become considerably more significant when the development is viewed as a whole and across the rural communities which surround it.	communities are identified where pertinent to the assessment being undertaken. The Applicant considers that the ES provides sufficient information to identify the receptors relevant to each assessment.
WR-GMPC-004	Cumulative Effects, In-Combination Impacts	The Parish Council is particularly concerned that East Pye Solar should not be considered as though it will exist in isolation. There are already other substantial energy infrastructure proposals in the immediate Great Moulton area, including FIELD Long Stratton, a separate proposal for a Battery Energy Storage System capable of providing up to 400 MW of electricity. If East Pye is consented and major new grid infrastructure becomes permanently established around Great Moulton, the Examining Authority should consider whether that infrastructure could facilitate, encourage or make this area more	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 existing and/or approved developments. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with the methodology set out in **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 assessment. Each relevant topic chapter of the Environmental Statement considers cumulative effects, with a summary provided in **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]**. The Applicant notes that any future development in the area would be subject to the relevant and applicable planning process, and

ID	Theme	Comments/Issues Raised	Applicant's Response
		attractive for further energy infrastructure proposals. Successive large-scale developments have the potential to progressively affect landscape character, tranquillity, agricultural land, public rights of way, local roads, wildlife, residential amenity and people's enjoyment of the countryside. The Parish Council is particularly concerned about an incremental effect whereby each subsequent proposal is considered individually and partly justified by infrastructure or development which has already been established. Taken collectively over many years, the result could be a fundamental transformation of the rural character of this part of South Norfolk. Great Moulton Parish Council asks the Examining Authority to give substantial consideration to existing and reasonably foreseeable energy infrastructure proposals surrounding Great Moulton, including FIELD Long Stratton, when assessing the cumulative effects of East Pye Solar.	through which its acceptability would be scrutinised. Such development would be required to take into account any cumulative impacts in combination with East Pye Solar

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-GMPC-005	Landscape and Visual Human Health	The rural character, landscape, tranquillity, local roads, public rights of way, environment and residential amenity of Great Moulton and the surrounding countryside should be considered as a whole rather than as a series of isolated impacts. This is major infrastructure which, if consented, would alter the environment surrounding Great Moulton for decades. The long-term consequences for the village and neighbouring communities must therefore be given appropriate weight when balanced against the claimed benefits of the scheme.	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. The Applicant considers that **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** recognises the landscape as a complex and interconnected environment comprising physical, cultural, historic and perceptual characteristics. As described in the baseline and landscape character assessment, consideration has been given to landscape character, settlement pattern, heritage features, public rights of way, vegetation structure, tranquillity and other characteristics that contribute to the experience and perception of the receiving landscape. The South Norfolk and High Suffolk Claylands National Character Area (NCA) is assessed as a landscape receptor in its own right. The assessment then considers the effects of the Scheme at progressively finer scales, including district landscape character areas, and site-specific receptors. This approach is consistent with established LVIA practice and enables effects to be

ID	Theme	Comments/Issues Raised	Applicant's Response
			understood at different geographic scales rather than treating the landscape as a series of disconnected parcels. 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]** and associated appendices. In addition, the visual assessment considers visual effects from visual receptors including the surrounding villages.
WR-GMPC-006	EIA Methodology Site Selection, Alternatives and Design Evolution	The Parish Council is concerned about the extent to which the acceptability in the development relies upon mitigation, later design decisions and controls which would be developed after consent. Where significant impacts cannot be avoided, they should be properly understood and assessed before development consent is granted rather than relying upon future mitigation to resolve important issues at a later stage.	The Applicant refers to its response to WR-BPC-026 regarding the mitigation and control measures secured through outline management plans.
WR-GMPC-007	Compulsory Acquisition	The BEPS representation raises questions regarding the extent of compulsory acquisition powers being sought while elements of the final	The Applicant refers to its responses to BEPS-058 and BEPS-056, respectively, in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable**

ID	Theme	Comments/Issues Raised	Applicant's Response
		scheme, land requirements, grid connection and mitigation remain uncertain. Given the scale and permanence of some of the infrastructure proposed around Great Moulton, these matters warrant particularly careful examination.	**Parties [PDA-010]** for an explanation of Scheme flexibility under the Rochdale Envelope approach and the use of compulsory acquisition powers. The **Statement of Reasons [APP-020]** explains why compulsory acquisition powers are required and justified. The Applicant also refers the respondent to the **Works Plan [REP1-005]** which sets out the spatial extent of each of the Work Numbers listed Schedule 1 of the **Draft DCO [REP1-014]**.
WR-GMPC-008	Soils and Agriculture	The Parish Council considers that the effect upon agricultural land must be examined in the wider context of national food security. This has particular relevance in Norfolk, one of the country's most important agricultural counties. Norfolk produces almost 20% of the nation's peas and beans, approximately 13% of its potatoes, more than 30% of England's sugar beet and over 6% of England's cereals. The agricultural land affected by major development in Norfolk therefore performs a food production function extending considerably beyond the communities in which that land is located.	The effect upon agricultural land is considered in Section 15 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** yield and economic benefits can be illustrated using recognised agricultural budgeting books. ES Chapter 15 has used Nix Farm Management Pocketbook 56th Edition (2025), since the time of writing the 57th edition has been published. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. Furthermore, there are no policies or requirements for land to be farmed for food production or at any

ID	Theme	Comments/Issues Raised	Applicant's Response
		The Parliamentary statements demonstrate that the relationship between energy security, agricultural land and food security is an important matter of public policy. The Examining Authority should give appropriate weight to the agricultural quality and productive value of the land affected, the duration for which it would be removed or restricted from conventional agricultural production, the cumulative amount of agricultural land being committed to major infrastructure across Norfolk and the wider region, and whether reasonable alternatives involving previously developed land, rooftops, brownfield land or lower quality agricultural land have been adequately considered.	particular level of intensity, irrespective of ALC grade. The area of agricultural land in Norfolk is about 417,633ha. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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. Under the new Predictive ALC Map for England, approximately 94% of Norfolk's agricultural land is BMV, so the Order Limits are not unusually high in BMV. The **Site Selection Assessment [APP-215]** was undertaken proportionately and in accordance with national planning policy. As set out in the Site Selection Assessment, for the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the search area (not using the new predictive ALC mapping as this was not available at the time). Paragraph 2.10.21 of NPS EN-3 states: 'While land type should not be a predominating factor in

ID	Theme	Comments/Issues Raised	Applicant's Response
			determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible. Accordingly, the presence of BMV land does not preclude solar development at Stage 2 or thereafter
WR-GMPC-009	Site Selection, Alternatives and Design Evolution	The countryside surrounding Great Moulton, Wacton, Aslacton and neighbouring communities is not simply undeveloped space available for energy infrastructure. It is productive agricultural land and the environment in which people live, walk, cycle, farm, work and spend their leisure time.	The Applicant notes the Council's comments. The potential effects of the Scheme on agricultural land, landscape and visual amenity, Public Rights of Way and other users of the local highway network have been assessed within the relevant technical chapters of the Environmental Statement as follows: • Visual impacts on PRoW users: **ES Chapter 7 – Landscape and Visual [APP-043];** • Interactions between the Scheme and the PRoW network, and impacts on pedestrian delay and non-motorised users: **ES Chapter 11 – Transport and Access [APP-047]**; and

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Impacts on agricultural land and farm businesses: **ES Chapter 15 – Soils and Agricultural Land [APP-051].**

2.3 Hedenham Parish Meeting

Table 2.3 Applicant's response to Hedenham Parish Meeting [REP1-399]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR- HePC-001	Site Selection, Alternatives and Design Evolution	Hedenham Parish lies at the eastern extreme of the Scheme with Site 10, comprising sub-Sites 10A through 10E, on its northern boundary. The Parish fundamentally objects to the Scheme as a whole. The report concludes that the proposed location of Site 10 is unsuitable and potentially dangerous and that Site 10 should be rejected.	The Applicant notes Hedenham Parish Council's objection to the Scheme and Site 10 in particular. Detailed responses have been provided herein. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme, including Site 10). It would not be consistent with the government's objectives to deliver a scheme which is smaller than that which the Applicant has assessed as being acceptable on a planning basis. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR- HePC-002	Aviation (Seething)	Sub-Site 10B intrudes into the Seething Airfield Public Safety Zone and the Parish considers that the safety concerns are not mitigated in the proposed Scheme design, even after recent changes.	The Applicant refers to its response to Hedenham Parish Meeting under HePC-008 in **The Applicants Response to Relevant Representation Part 4 - Parish and Town [PDA-011]**.
WR- HePC -003	Ecology and Biodiversity	The anticipated impact on wildlife includes resident Barbastelle bat maternity colonies and other wildlife flourishing in local woodlands and hedgerows. The adverse effects on the local Barbastelle population's favourable conservation status are considered incapable of mitigation and fundamentally incompatible with the Habitats Regulations.	The Applicant refer to its response to Hedenham Parish Meeting under HePC-007 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-HePC -004	Water Environment – Water Quality, Drainage and Flood Risk	Run-off water management in and around Woodton is a key concern because the village already has a history of flooding. There are no documented provisions to manage run-off water from Site 10 and the flooding risk it poses to Woodton village.	The majority of Site 10 will consist of Solar PV Arrays which will be raised on narrow supports at an appropriate freeboard above ground level/anticipated flood depths. The ground beneath the arrays will be grass cover and therefore will mimic the existing drainage regime. A Project Substation is proposed within Sub-Site 10C which will incorporate a lined surface water drainage system with a controlled discharge to the nearest ditch.

ID	Theme	Comments/Issues Raised	Applicant's Response
			As such, the Scheme will not increase flood risk elsewhere. The above flood risk mitigation is secured within the **Design Principles, Parameters and Commitments [REP1-078]**.
WR- HePC - 005	Cultural Heritage	Site 10 sits directly between the Conservation Areas of Seething and Hedenham and would damage the rural environment for the long term, contradicting the reasons for and purpose of those Conservation Areas. The report raises impacts on Grade II listed properties and the legacy of the former USAF 8th Air Force base at Seething.	The Applicant refers to its response provided to Hedenham Parish Meeting's relevant representation [RR-0740] in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]** under comment ID HePC-002. The Applicant notes that Hedenham Parish Meeting has raised concerns regarding potential impacts to the following six Grade II Listed Buildings: • Beulah Barn (NHLE 1305841); • Beulah House (NHLE 1051115); • Manor Farmhouse (NHLE 1051114); • Old Rectory (NHLE 1051116); • The Tumbledown Dick (NHLE 1171098); and • Woodton Lodge (NHLE 1305739). The potential for impacts to Beulah House, Beulah Barn and the Old Rectory by the Scheme were identified at PEIR stage and were taken forwards for further assessment within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 – Heritage**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Statement [APP-165 – APP-168] (pgs. 197-201). These assessments concluded that not part of the Scheme within Site 10 would be of a visual prominence and therefore, the change to the settings of these three designated heritage assets would be negligible, resulting in no harm to their overall significance. The remaining three assets (Manor Farmhouse, The Tumbledown Dick, and Woodton Lodge) were scoped out at PEIR stage, in consultation with Historic England and SNDC, as they were not considered sensitive to the Scheme . The Applicant further notes that the former RAF Seething airfield was included for assessment within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]**. The former WWII Airfield, which was once considerably larger than the existing airfield present beyond the Site boundary, once extended into Site 10, as seen in the geophysical survey results presented within **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]**. The Applicant notes that the removal of the fields within the Scheme, within which remains of the former WWII Seething Airfield survive below-ground, will reduce the impact of their degradation via ploughing for a number of years, which will in turn help conserve what remains of the former Airfield

ID	Theme	Comments/Issues Raised	Applicant's Response
			within the Scheme. The Applicant further notes that the various below ground impacts of the Scheme have been discussed with NCCHES and have been used to inform **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**. In consultation with NCCHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known. This will ensure preservation in proportion to the significance of archaeological remains present. This includes 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. 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.
WR- HePC-006	Transport and Access	The local road network consists of narrow rural lanes and the report raises significant concerns about their use during construction. The suitability of designated Site 10 access points and inter-site access points is challenged.	The Applicant refers to its response to HePC-009 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Sub-Site 10A has no acceptable access route and should be removed from the Scheme. The report raises impacts on public rights of way, pedestrians, children, cyclists and other local road users.	
WR- HePC-007	Site Selection, Alternatives and Design Evolution	Sub-Site 10E is considered immaterial to the potential solar generation value of the Scheme and should be removed because of the additional construction disruption, cost, environmental damage and industrial sprawl it would introduce.	Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme including Sub-Site 10E) that outweigh the less substantial harm identified, as set out within the **Planning Statement [REP1-074].** 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.
WR- HePC-008	Socio-Economics	Local businesses, notably those associated with South Norfolk's tourism industry, are expected to be severely and detrimentally affected during construction and operation. There are no specific proposals for appropriately compensating affected businesses or homeowners who may find properties devalued and more difficult to sell.	The Applicant refers to its response to HePC-006 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR- HePC-009	Landscape and Visual	Light pollution and its consequences for the Seething Observatory of the Norwich Astronomical Society are a key concern.	The Applicant refers to the principles set out in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151]**. Construction lighting will be limited to areas where specific tasks are being undertaken, with luminaires orientated towards the task area and away from the night sky. Operational lighting will remain off throughout the night unless the Site is occupied and lighting is required. All luminaires will be directed downwards and will have a negligible or zero upward light ratio to minimise upward light and the potential for sky glow. These measures are secured within the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]** respectively, which are in turn secured by Requirements 13 and 14 of the **Draft DCO [REP1-014]**.
WR- HePC-010	Landscape and Visual	Site 10 is considered out of proportion and character with the tranquil rural countryside and would impose a scale of industrialisation that local residents should not be required to accommodate. Site 10 is more than 140 hectares and the concentrated solar panel areas would be visible from local roads and have a	The Applicant refers to its response to HePC-001 and HePC-002 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		significant impact on the rural nature of the locality. The concentration of four-plus metre high solar panels, security fencing and automatic movement-detection lighting would have significant detrimental impacts for local residents and wildlife.	
WR- HePC-011	Cumulative Effects, In-Combination Impacts	Site 10 lies at the far eastern extremity of the Scheme, around 15 km from the proposed grid connection, and is considered to add significantly to the sprawl and construction damage of the Scheme across South Norfolk. The Parish asks that Site 10 be rejected because of aviation safety, ecological, heritage, access, flood-risk and socio-economic impacts.	The Applicant refers to its response to HePC-001, HePC-002, HePC-006, HePC-007, HePC-008 and HePC-009 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**, as well as the additional responses provided above.

2.4 Hempnall Parish Council

Table 2.4 Applicant's response to Hempnall Parish Council [REP1-156], [REP1-383], [REP1-455] and [REP1-489]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HPC-001	Landscape and Visual	Hempnall Parish Council's Landscape and Visual Case is rooted in field research, including numerous site visits and walks along Public Rights of Way that cross or are alongside proposed solar sites. Hempnall Parish Council assesses landscape effects during construction as major, adverse and highly significant over a large area within South Norfolk.	The Applicants LVIA 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. The Applicant agrees that during construction a range of significant adverse effects would occur on the landscape and visual receptors.
WR-HPC-002	Landscape and Visual	The Council considers the ES consistently underestimates landscape effects during the operation phase Year 1.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices identifies a range significant adverse effects during Year 1. As is typical for large-scale infrastructure projects, significant effects are identified where receptors are in close proximity to the Scheme and typically these reduce with distance from the Scheme. These conclusions are transparently presented within the ES and demonstrate that the assessment has robustly identified the Scheme's effects.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HPC-003	Landscape and Visual	The Council considers the ES consistently underestimates landscape effects during the operation phase Year 15 and questions the claim that mitigation planting would reduce those impacts; it may create negative outcomes for the landscape.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices identify a range of significant effects would remain at Year 15, albeit some would reduce as a result of the established landscape mitigation measures. 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.
WR-HPC-004	Landscape and Visual	If a level of significance of landscape effect was applied to the whole Scheme, Hempnall Parish Council considers it would be Major and Significant and the direction of effect would be adverse.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices identifies a range significant adverse effect on individual receptors at defined phases. The assessment process is intended to identify and explain the significance of effects on those receptors through professional judgement, and in accordance with

ID	Theme	Comments/Issues Raised	Applicant's Response
			guidance no summary overall significance rating for the Scheme is presented. As reported significant effects would be localised to those receptors identified in the assessment.
WR-HPC-005	Landscape and Visual	For Site 7F, the Council's field assessment found most viewpoints would experience Major to Substantial, Significant and Adverse visual impacts at Year 1. For Site 7F, the Council's field assessment found most viewpoints would experience Major to Substantial Adverse impacts at Year 15.	Please see the Applicants response to WR-HPC-003, and WR-HPC-004.
WR-HPC-006	Landscape and Visual	The Council concludes that visual impacts throughout the whole Scheme area would be Major to Substantial, Significant, Direct and Adverse and that the ES consistently underestimates these impacts.	Please see the Applicants response to WR-HPC-002, HPC-003 and WR-HPC-004.
WR-HPC-007	Landscape and Visual	The Council's Narrative Walk 7ii assessment identifies solar panels, security fencing, cameras, inverter buildings, access tracks and the 132kV substation as dominating and obliterating existing long open views across pastoral meadows.	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 and would reduce effects for a portion of route 'Narrative Walk 7ii' as

ID	Theme	Comments/Issues Raised	Applicant's Response
			shown on the **Green Infrastructure Strategy [REP1-013]**.
WR-HPC-008	Landscape and Visual	Mitigation planting would itself represent a substantial change from the baseline, enclosing views that are currently open and relatively uninterrupted.	Whilst the Scheme would result in the addition of solar development and a Project substation 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. 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.
WR-HPC-009	Landscape and Visual	Hempnall Parish Council considers that the ES Residential Visual Amenity Assessment fails to cover visual impacts on residential amenity comprehensively and adequately. Hempnall Parish Council assesses both inter-project and intra-project landscape	The **Residential Visual Amenity Assessment (RVAA)** presented in **ES Volume 3, Appendix 7.8 [REP1-046]** accords with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019), which distinguishes between general visual effects and the specific assessment of whether a development would become overbearing, overwhelming or

ID	Theme	Comments/Issues Raised	Applicant's Response
		and visual cumulative effects as major, significant and adverse.	oppressive when experienced from a residential property. 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 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.
WR-HPC-010	Cumulative Effects, In-Combination Impacts Landscape and Visual	The Council also considers that in-combination effects from construction and operation would be major, significant and adverse.	The Applicant notes the comments regarding in combination effects. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been 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 therefore consider the effects of the Scheme as a whole rather than individual elements in isolation.
WR-HPPC-011	Cumulative Effects, In-	The Council considers the ES cumulative study area too small and the list of	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA**

ID	Theme	Comments/Issues Raised	Applicant's Response
	Combination Impacts	developments too short, thereby ignoring cumulative impacts over the wider area. The sheer scale and dispersed nature of East Pye would itself increase cumulative impacts across many villages and communities. The dispersed nature of the development and the number of villages affected is a key reason why Hempnall Parish Council considers the Scheme should be refused.	**Methodology [APP-038]**. **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES, and the methodology used. A topic-based approach has been taken to identify the Zones of Influence (ZoI) for identifying cumulative schemes that could present cumulative effects. The worst-case ZoI for each environmental topic area is identified based on the extent of likely significant effects in line with industry specific guidance along with professional judgement and knowledge of the local area. The largest ZoI, 25km in the case for this Scheme, represents the search area used to compile the long list of developments. The Short List was then established to include only those schemes which were considered to result in significant cumulative effects, in line with PINS guidance. The Applicant will continue to engage with NCC and SNC regarding the cumulative schemes as examination progresses.
WR-HPC-012	Cultural Heritage	The development would pose threats to conservation areas during construction and operation, including direct effects from road widening and indirect effects from industrialising the rural setting that contributes to their character.	The Applicant notes that in their response, Hempnall Parish Council has raised concerns regarding the following Conservation Areas: • Brooke (Site 9); • Fritton (Site 5B); • Hempnall (Sites 7B & 7C); • Saxlingham Green (Sites 7D & 7F);

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Shotesham (Site 8B); and • Wacton (Site 2C). Hempnall Parish Council also makes reference to a 'Saxlingham Village Conservation Area' which is also quite close to Site 7D, which the Applicant assumes is in reference to Saxlingham Nethergate Conservation Area. The Applicant refers to its response provided in Hempnall Parish Council's relevant representation [RR-0760] in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]** under comment ID HPC-008.
WR-HPC-013	Transport and Access	The abnormal loads route through conservation areas in Shotesham, Saxlingham Nethergate and Saxlingham Green could produce significant impacts, particularly along Church Hill, Saxlingham. Many minor roads identified as construction routes would suffer changes in character from road widening, hedgerow removal and tree felling.	The Applicant acknowledges the concerns raised regarding potential effects associated with AIL movements and construction traffic on rural roads. The proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs. **ES Volume 2: Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed AIL route to the Scheme. Temporary measures associated with AIL movements would be managed in accordance with the framework set out in Section 6 of the **Outline CTMP [REP1-068].** Further detail will be provided

ID	Theme	Comments/Issues Raised	Applicant's Response
			through the detailed Construction Traffic Management Plan subject to approval by the relevant planning and highway authorities pursuant to Requirement 15 of the DCO.
WR-HPC-014	Transport and Access	The proposal to use new haul routes through attractive, tranquil rural countryside is a major concern and is considered highly destructive.	The Applicant acknowledges the concerns raised regarding the use of haul routes within rural areas. The proposed haul routes form part of the construction strategy for the Scheme, developed in consultation with NCC. They were developed having regard to a range of considerations, including environmental, ecological, landscape and transport constraints. The selected routes have been developed to facilitate the safe and efficient construction of the Scheme, whilst seeking to minimise impacts on surrounding communities and the receiving environment. Construction traffic using these routes would be managed in accordance with the **Outline CTMP [REP1-068]**. Further detail will be provided through the detailed Construction Traffic Management Plan subject to approval by the relevant planning and highway authorities pursuant to Requirement 15 of the DCO.
WR-HPC-015	Lighting	Construction and operation would introduce considerable artificial lighting into previously unlit places in an area	The Applicant refers to the principles set out in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151]**

ID	Theme	Comments/Issues Raised	Applicant's Response
		classed as Rural Dark Landscape by Norfolk County Council.	Construction lighting will be temporary and used only where required to facilitate specific tasks, with luminaires orientated towards the task area and away from the night sky to minimise unnecessary light spill. During operation, lighting will remain switched off when the Sites are unoccupied and will only be used where necessary. Luminaires will be directed downwards and selected to provide a negligible or zero upward light ratio, minimising upward light and the potential contribution to sky glow. These measures are secured within the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]** respectively, which are in turn secured by Requirements 13 and 14 of the **Draft DCO [REP1-014]**.
WR-HPC-016	Public Rights of Way	The Council considers impacts on Public Rights of Way to be major and adverse.	The Applicant does not agree that the impacts on Public Rights of Way are major adverse. The effects on non-motorised users were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023), which represents recognised industry best practice for the assessment of transport effects within Environmental Impact Assessments.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The assessment considered the effects of the Scheme on non-motorised users and Public Rights of Way and determined the significance of effects in accordance with this methodology. The Applicant therefore considers that the impacts on Public Rights of Way have been assessed in line with recognised best practice and do not result in major adverse effects.
WR-HPC-017	Policy compliance Need for the Scheme	In the overall planning balance, Hempnall Parish Council considers the adverse impacts clearly outweigh the alleged benefits and requests that the application be refused.	The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicants position is that most significant adverse effects associated with the Scheme would be temporary and reversible. Furthermore, substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised significant beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training.
WR-HPC-018	Cumulative Effects, In-	Hempnall Parish Council identified 26 parishes or settlements with Parish/Town	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Combination Impacts	Councils that would experience very direct impacts, including 13 with solar infrastructure inside their boundaries. The reason so many villages would be directly affected is because the Scheme is dispersed over approximately 15 km and includes nine sites proposed for solar infrastructure.	
WR-HPC-019	Cable Route Corridor	Cable route corridors would affect the whole Scheme area and many villages very directly.	The Applicant notes this comment. Following installation of the cable routes, the area would be reinstated.
WR-HPC-020	Consultation and Engagement	At the November 2024 parish meeting only one person voted in support of the development, fewer than 10 abstained and everyone else present voted against it. At the April 2026 parish meeting everyone voted to oppose the development.	The Applicant notes this comment.
WR-HPC-021	Need for the Scheme Site Selection, Alternatives and Design Evolution	Hempnall Parish Council supports decarbonising energy production through renewable energy, but considers it should not be achieved at the expense of the countryside.	The Applicant notes and welcomes the Parish Council's support for the decarbonisation of energy production through renewable energy. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently

ID	Theme	Comments/Issues Raised	Applicant's Response
	Landscape and Visual	The Council points to rooftop and developed-space solar as an alternative and argues that renewable energy should be delivered at the right scale and in the right locations. The Council considers that large areas of attractive rural countryside would be covered by industrial infrastructure and that the local landscape would be decimated.	needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need [APP-206]** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. Paragraph 2.10.28 of NPS EN-3 (2025) recognises that potential solar farm sites are largely in rural areas and the Applicant has addressed matters relating to the planning balance in the **Planning Statement [REP1-074]**.
WR-HPC-022	Public Rights of Way	An initial study identified 22.8 km of paths with solar sites on one or both sides, including Pymers Lane and Nobbs Lane, with many more views from Public Rights of Way negatively affected. The cabling process is expected to cause substantial disruption to landscapes, roads, footpaths, flora and fauna.	The Applicants notes the comment. The PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]** includes identification of the affected lengths of routes within the Order Limits. The management of Public Rights of Way during construction is set out within the **Outline PRoW PPMP [APP-203].** Where temporary Public Rights of Way crossings are required for cable installation, these are expected to be short-term in duration. Following completion of the relevant works, access would be reinstated.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HPC-023	Cable Route Corridor	Concern was raised that once cabling and other infrastructure are in place, the area may become more attractive for additional solar development.	The Applicant notes the concern raised. Any future development proposals would be subject to their own consenting and assessment processes.
WR-HPC-024	Soils and Agriculture	The Council raises concern about loss of valuable farmland and food security.	The effect upon agricultural land is considered in **ES Chapter 15, Section 15 [APP-051]**, yield and economic benefits can be illustrated using recognised agricultural budgeting books. ES Chapter 15 has used Nix Farm Management Pocketbook 56th Edition (2025), since the time of writing the 57th edition has been published. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. Furthermore, there are no policies or requirements for land to be farmed for food production or at any

ID	Theme	Comments/Issues Raised	Applicant's Response
			particular level of intensity, irrespective of ALC grade. The area on farms in Norfolk is about 417,633ha. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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.
WR-HPC-025	Ecology and Biodiversity	The Council questions whether biodiversity gains claimed for solar sites reflect the biodiversity of less intensively managed farmland and notes concerns about effects on Barbastelle bats.	The Biodiversity Net Gain assessment strictly assesses the habitats present onsite and not their relationship with other ecological receptors. A full breakdown of the biodiversity net gain within the Order Limits is presented in the **Biodiversity Net Gain Report [APP-218]** and the **Biodiversity Net Gain Statutory Metric [APP-219].** With relation to the effects on Barbastelle bats, the Applicant refer to its response to Hedenham Parish Meeting under HePC-007 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011].**

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HPC-026	Transport and Access	Concern was expressed about the ability of the existing road structure to cope with construction contractors and maintenance traffic.	The Applicant acknowledges the concerns raised regarding the ability of the local highway network to accommodate construction and maintenance traffic. The effects of construction traffic have been assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. Construction traffic routes and vehicle types were identified having regard to the characteristics of the local highway network, and construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**. The Applicant also notes that Section 7.14 of the **Outline CTMP [REP1-068]** sets out the framework for highway condition surveys and the process for identifying and addressing any highway defects attributable to construction traffic.
WR-HPC-027	BESS Safety	It was unknown how safe the battery storage facility would be.	The Applicant's **Outline BSMP [REP1-066]** was prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Section 3 of the **Outline BSMP [REP1-066]** very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage.
WR-HPC-028	Electromagnetic Fields	Concern was expressed about electromagnetic radiation from the development, particularly in relation to inverters and cable runs.	The Applicant has assessed the impact of electromagnetic fields from all proposed infrastructure which includes the underground cabling infrastructure, overhead cabling infrastructure, transformers and inverters in **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** and concludes that a significant impact is not predicted.
WR-HPC-029	Water Environment	Concern was expressed about the need for adequate facilities to deal with water run-off if the land is sheltered by panels.	The Applicant refers to its response under WR-HDPC-004.
WR-HPC-030	Landscape and Visual	The meeting considered that no mitigation could compensate for the scale of landscape damage the Scheme would cause and raised concern that promised mitigation is not always delivered or enforced.	The Applicant notes the comment. The **Green Infrastructure Strategy [REP1-013]** was submitted in the Application as a standalone document but also features as Appendix B of the **Outline LEMP [REP1-064]**. It is therefore secured under Requirement 7 of the **Draft DCO [REP1-014]** and therefore the final LEMP will be subject to approval by the relevant planning authority in

ID	Theme	Comments/Issues Raised	Applicant's Response
			consultation with the relevant statutory nature conservation body. The Green Infrastructure Strategy presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. Areas for mitigation and enhancement on which the Environmental Impact Assessment relies are defined on the Indicative Masterplan as provided in **ES Volume 2 [REP1-025]** and secured by Work No 10 as defined in the **Design Principles, Parameters and Commitment Document [REP1-078].** The **Outline LEMP [REP1-064]** establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. The Outline LEMP includes a commitment to providing a LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, which will be approved by the relevant planning authority pursuant to Requirement 7 in the **Draft DCO [REP1-014].** The LEMP will include: • The detailed landscape proposal plans to identify the location, number, species, size, and planting density of any proposed landscape planting and ecological measures.

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Landscape planting specification including, cultivation, importing of materials and other operations to ensure landscape planting establishment. • Implementation timetables for all landscape planting and ecological measures. • Management and maintenance timetables for all landscape planting and ecological measures. • Monitoring prescriptions for all landscape planting and ecological measures.
WR-HPC-031	Transport and Access Scheme Description	Hempnall Parish Council considers that the proposed Indicative Access Points and Indicative Access Routes are insufficiently defined. It is unclear whether the locations shown are merely possibilities or where access points and routes would actually be constructed. The Parish Council considers that an application of this scale should identify the exact location of access points and that the Applicant's maps and plans contain a number of deficiencies, inconsistencies and inaccuracies.	The Applicant notes the concerns raised regarding the level of detail provided for access locations and routes. The application documents identify the proposed access strategy for the Scheme. Detailed design would be undertaken following grant of development consent and would inform the final design of access arrangements and associated highway works. The Applicant does not agree that access locations have not been adequately identified. Further detail regarding the location and geometry of proposed construction accesses is provided within Appendix C of **ES Volume 3, Appendix 11.1 – Transport**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Assessment [APP-174 to APP-177], which includes access drawings showing the proposed layout and dimensions of the identified accesses.
WR-HPC-032	Policy compliance Landscape and Visual	Hempnall Parish Council relies on South Norfolk Council's Landscape Susceptibility in relation to Energy Generation, Storage and Transmission SPD. It notes that Landscape Character Areas are assessed as having High or Medium-High susceptibility to solar PV development above 50MW and considers that the impacts of the proposed East Pye scheme, at up to 500MW, should therefore be treated as particularly significant. The Council also notes the SPD's Medium-High susceptibility findings for large-scale BESS and substations.	The Applicant notes the comment. The Applicant is aware of the document however it was published at the time the Application was made and therefore only the draft version was available to inform **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices. At the time of drafting the SPD excluded NSIP scale solar development. In general, the Applicant has identified the following key differences of professional opinions with the SPD: - The SPD does not address the reversibility of solar PV development. Given that solar panels are removable and the land can be restored, the susceptibility of the landscape for solar PV development is inflated in general. - The SPD appears to overstate the susceptibility of arable fields, despite categorising them as medium in its own criteria. It also fails to consider the potential for landcover restoration following decommissioning.

ID	Theme	Comments/Issues Raised	Applicant's Response
			- Solar PV development involves a change in land use, but it remains broadly consistent with the baseline productive landscape. The solar PV development does not affect settlement patterns. - Although large-scale solar PV developments may be visible, their low height results in minimal impact on landscape openness. Views containing solar panels could still be perceived as open in character. - The perceived impact on landscape intactness is largely perceptual. Solar PV development has limited effect on landcover and field pattern and thus does not materially compromise the integrity of the landscape.
WR-HPC-033	Need for the Scheme Site Selection, Alternatives and Design Evolution	Hempnall Parish Council considers there are alternative ways of delivering the required solar contribution without covering large areas of countryside. It cites CPRE/UCL research suggesting that up to 117GW of solar energy could be generated from existing rooftops, car parks and other artificial surfaces. It also notes that East Pye would not be connected to the grid before 2030 and therefore would not contribute towards the 2030 Clean Power target.	The Applicant refers to its response to HPC-005 and HPC-009 in **The Applicants Response to Relevant Representation Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HPC-034	Scheme Description Site Selection, Alternatives and Design Evolution	Hempnall Parish Council considers that each of the nine proposed solar sites should have been treated as separate applications because they are spatially separated over a wide area and their only interconnection is provided by cable route corridors.	The Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The Applicant has outlined its approach to site selection and the considerations made in the **Site Selection Assessment [APP-215]**. As set out within the **Site Selection Assessment [APP-215]**, the Applicant searched for an area of approximately 1,100ha to accommodate solar panels for a 500MW grid connection. The Applicant considered a range of planning, environmental and technical factors. A search was undertaken with the help of land agents to identify sites within for which there were potentially willing landowners. The Sites within the Order Limits are considered to be suitable against planning, environmental and technical factors. Further, the **Statement of Need [APP-206]** explains that proposals may comprise adjoining parcels of land or separate parcels of land which do not border each other but instead combine to an integrated Scheme which is more dispersed within a countryside setting. Further, the connection of separate parcels of suitable land together into a

ID	Theme	Comments/Issues Raised	Applicant's Response
			single Scheme may, subject to analysis, enable those parcels of land to connect appropriately to the electricity system, whereas if developed as stand-alone projects they may not be able to carry the associated costs of connection and therefore may never be developed.
WR-HPC-035	Noise and Vibration Public Rights of Way	Hempnall Parish Council considers that users of Public Rights of Way would experience a loss of tranquillity during operation as well as during construction. It states that individual tracker solar panels generate approximately 58dB when moving and argues that the cumulative noise from a whole field of tracker panels has the potential to create a significant amount of noise.	The Applicant acknowledges the concern regarding the potential effect of operational noise on the tranquillity experienced by users of Public Rights of Way (PRoW). Operational noise from the Scheme, including the collective contribution from the tracker motors, has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The Applicant does not recognise the stated figure of approximately 58 dB as representative of the tracker motors assessed for the Scheme. The assessment adopted a sound power level of approximately 50 dB L_w for each tracker motor. Sound power level is a property of the source and is not equivalent to the sound pressure level that would be experienced by a PRoW user. The latter reduces with distance from the source. The tracker motors have not been assessed as isolated sources. Their cumulative contribution was included in the operational noise model. For example, the assessment modelled 241 tracker motors within Sub-Site 8A operating collectively and

ID	Theme	Comments/Issues Raised	Applicant's Response
			predicted a contribution of approximately 11 dBA at the nearest noise-sensitive receptor. The assessment therefore accounts for the number and distribution of tracker motors within the solar arrays rather than assuming that the effect of a field can be represented by the level from one motor. The assessment concludes that operational noise effects on PRoW users would be negligible and not significant. In addition, the **Outline OEMP [REP1-060]** secures a requirement that the specific sound level from the Scheme at PRoWs must not exceed 55 dBA, and be mitigated to 50 dBA where practicable. On this basis, significant adverse effects on the tranquillity or amenity of PRoW users as a result of tracker operation are not anticipated.
WR-HPC-036	Construction and Decommissioning Landscape and Visual	Hempnall Parish Council considers that the landscape and views would not necessarily return to their pre-Scheme condition following decommissioning. It argues that mitigation planting introduced to screen the development would remain after the solar infrastructure was removed and would continue to block existing open views and alter landscape character.	The Applicant notes the comment. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has considered the retention of the mitigation as part of the decommissioning phase. The retention of proposed mitigation will ultimately be the responsibility of the landowners but removal would be subject to any legislative requirements that apply at the time. Whilst the developed **Green Infrastructure Strategy [REP1-013]** supports visual screening, proposed measures strengthen and reinforce existing features, and the Applicant considers the mitigation also

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. It should therefore not be regarded simply as introducing an entirely new landscape negative feature.

2.5 Kirstead Parish Meeting

Table 2.5 Applicant's response to Kirstead Parish Meeting [REP1-165]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KPM-001	Need for the Scheme	Information relayed to the parish by other Interested Parties, particularly changes made by East Pye Solar, has further hardened opposition to the Scheme. Many issues have not been addressed by East Pye Solar since the PEIR and the level of damage to the natural and manmade environment is considered to outweigh the claimed green-energy benefit. The submission argues that the energy is not actually required to satisfy future needs as defined by the National Energy System Operator.	The **Statement of Need [APP-206]** sets out the government's policy position that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme. It also explains that the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs is that substantial weight is given to the need for such schemes (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the **Statement of Need [APP-206]** explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). However, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). This is because, as Section 4.3 of the **Statement of Need**

ID	Theme	Comments/Issues Raised	Applicant's Response
			[APP-206] explains, current levels of national electricity demand are expected to double to electrify transport and other non-electricity sector demand. Regional electricity demand is likely to grow at a similar rate to national electricity demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030. Section 7.3 of the **Statement of Need [APP-206]** sets out the challenge to deliver net zero regionally and underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Within this context of a clear national and regional need for the Scheme, it is clear that seeking to maximise the benefits arising from the Scheme is aligned with the government's energy policy.
WR-KPM-002	Socio-Economics	East Pye Solar acknowledges that the Scheme has no socio-economic benefits to East Anglia.	**ES Volume 1, Chapter 14 – Socio Economics [APP-050]** assesses socio-economic effects for each phase of the Scheme. These are summarised in Table 14.28. Significant effects identified include a Major or Moderate Beneficial effect on workplace-based jobs in South Norfolk in the Construction Phase and Decommissioning Phase. Corresponding effects for

ID	Theme	Comments/Issues Raised	Applicant's Response
			Norfolk and the East of England (within which East Anglia sits) are Minor Beneficial – this reflects that the scheme is smaller in relation to the larger size of those economies. Nevertheless, these impacts are still positive, albeit not significant in EIA terms. There are also Moderate Beneficial effects on Skills and the Labour Market in all Phases, reflecting the opportunities for skills development afforded by the Scheme. Overall, the Applicant would stress that no significant adverse effects are identified in Chapter 14, but significant positive effects are – and these would be felt in South Norfolk, which is part of East Anglia.
WR-KPM -003	Soils and Agriculture	The loss of Best and Most Versatile farmland is considered more relevant given the effects of climate change. East Pye Solar cannot prove that the land could be returned to arable use after the 60-year Scheme.	Loss of BMV land is limited to 28.9ha. land not subject to permeant works will be returned to agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. Decommissioning is outlined in the **Outline SRMP [APP-204]**. The outline SRMP sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through

ID	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 18 of the **Draft DCO [REP1-014]**. The Outline SRMP provides the structure and the types of controls to be included within the detailed SRMP. The final SRMP must be substantially in accordance with the outline version and will be subject to the approval of the relevant planning authority. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade. The land will be handed back to the respective landowners following decommissioning. There are currently no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade.
WR-KPM-004	Water Environment	The submission considers contamination of groundwater for human consumption and crops to be a likely occurrence.	The Scheme will incorporate appropriate pollution management measures as set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060] and Outline DEMP [REP1-062].** The BESS and Substation drainage systems will be lined so that runoff is contained and does not percolate to the geological strata beneath. This is secured through the **Design Principles, Parameters and Commitments [REP1-078]**, and through the detailed drainage design under DCO Requirement 11.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KPM-005	Transport and Access	The road network around the area is considered inadequate for the number and size of vehicles needed during construction.	The effects of construction traffic volumes were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023) and were not identified as resulting in significant effects. Vehicle tracking assessments were undertaken to inform the selection of appropriate vehicle types for individual routes. Where constraints were identified, smaller vehicle types were proposed to ensure that construction traffic could be accommodated safely on the local highway network.
WR-KPM-006	Consultation and Engagement	Neighbouring villages along the B1332, which is the parish's main access to Norwich and emergency services, are said not to have been included in consultation.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. As outlined the **Consultation Report [APP-024]**, the Applicant wrote to over 8,400 properties contained within the Applicant's core consultation zone and invited them to provide a response to the Targeted Consultation. This zone was consistent with the zone presented in the published Statement of Community Consultation (SoCC) (presented in **Consultation**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Report Appendix 5: Statement of Community Consultation Materials [APP-029]). The Applicant also notified localised communities, including relevant ward members, parish councils, MPs, community groups and gateway organisations. This aligned with consultation under the SoCC and involved the same list of non-prescribed groups consulted during statutory consultation. Furthermore, all prescribed consultees under Section 42 (statutory bodies), Section 43 (local authorities) and Section 44 (land interests) were notified of the Targeted Consultation. The Applicant also published a consultation advert in the Diss Express (presented in **Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]**), provided the consultation information on its website and contacted individuals who has registered to be kept informed about the Scheme.

2.6 Long Stratton Parish Council

Table 2.6 Applicant's response to Long Stratton Town Council [REP1-136]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-LSTC-001	Need for the Scheme Site Selection, Alternatives and Design Evolution	Long Stratton Town Council objects to East Pye Solar and specifically to Land Parcel 4. The applicant's case rests on a general national need for renewable energy but has not demonstrated a need for this particular utility-scale transmission solar scheme in this location. The Council considers Land Parcel 4 structurally unsuitable and says it should not form part of the Scheme. There are no matters capable of being resolved by landscaping, micro-siting or later management plans that make Land Parcel 4 suitable. Land Parcel 4 is within a designated part of Long Stratton and is considered to conflict with the adopted Long Stratton Neighbourhood Plan, including protection of historic character and setting, settlement/countryside distinction, rural approaches, landscape buffers and key views.	The **Statement of Need [APP-206]** sets out the government's policy position that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme. It also explains that the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs is that substantial weight is given to the need for such schemes (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the **Statement of Need [APP-206]** explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). However, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). This is because, as Section 4.3 of the **Statement of Need**

ID	Theme	Comments/Issues Raised	Applicant's Response
			[APP-206] explains, current levels of national electricity demand are expected to double to electrify transport and other non-electricity sector demand. Regional electricity demand is likely to grow at a similar rate to national electricity demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030. Section 7.3 of the **Statement of Need [APP-206]** sets out the challenge to deliver net zero regionally and underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme including Site 4) that outweigh the less substantial harm identified, as set out within the **Planning Statement [REP1-074]**. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Within this context of a clear national and regional need for the Scheme, it is clear that seeking to maximise the benefits arising from the Scheme is aligned with the government's energy policy. The Applicant's position on the Scheme's compliance with the relevant policies of the Long Stratton Neighbourhood Plan is set out within Table 9 of the **Policy Compliance Document [REP1-074]**. Detailed responses regarding the suitability of Site 4 for inclusion into the Scheme are provided herein.
WR-LSTC-002	Policy compliance	The applicant has not provided a lawful parcel-specific justification for overriding adopted local policy and national need for solar cannot substitute for proper analysis of development plan conflict.	The Applicant does not agree with this assertion. The relevant National Policy Statements provide the principal policy framework against which this nationally significant infrastructure project is examined and determined**.** The **Policy Compliance Document [REP1-076]** assesses the Scheme against the relevant NPSs and other relevant national and local planning policy. The overall planning balance is considered within the **Planning Statement [REP1-074]**, with the need for the Scheme addressed separately within the **Statement of Need [APP-206].**
WR-LSTC-003	Cultural Heritage	Land Parcel 4 lies within the setting of the Long Stratton Conservation Area and is closely associated with a high concentration of designated heritage assets, including Grade I St Michael's	The Applicant notes that potential impacts to Long Stratton Conservation Area were scoped out at PEIR stage, as it was considered that the Scheme would result in no harm to this assets character and appearance. As detailed within **Consultation Report**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Church, Grade II* The Old Rectory and numerous Grade II listed buildings. The introduction of extensive solar development would erode the clear separation between Long Stratton and countryside and transform the historic relationship between the settlement and its rural setting.	**[APP-024]**, consultation from Historic England (provided within their PEIR Response from August 2025) note they *'broadly agree with the scope and methodology of the cultural heritage and archaeology assessment'* as presented as PEIR stage, and reiterated within Historic England's relevant representation [RR-0769] in **The Applicant's Response to Relevant Representation Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [PDA-009]**, under comment HE-001, and within **Statement of Common Ground with Historic England [REP1-089]**, under comment HE CH – 1. Impacts to the five Designated Heritage Assets situated south of Sub-Site 4B, which include both the Grade I Church of St Michael (NHLE 1304267 and the Grade II* The Old Rectory (NHLE 1373264, in addition to three Grade II Listed Buildings (NHLE 1050305; 1050306; 1153545) were included in both **ES Volume 1, Chapter 10 - Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168]**. As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this group of heritage assets, with these areas retained as either open green field or agricultural land. Proposed landscape mitigation,

ID	Theme	Comments/Issues Raised	Applicant's Response
			in the form of native broadleaf woodland, will be established c. 420m north of these assets, and any gaps in the existing north/south aligned hedgerow through the southernmost field will be infilled. These mitigation measures will result in no harm to the significance of these heritage assets and, in fact, the new grassland to be established in the field north of the Church is considered to have a positive impact upon the setting of this asset, as it will enhance views south from PRoW FP3.
WR-LSTC-004	Landscape and Visual	Screening planting cannot remove the harm because dense planting would itself reduce openness and obscure the historic agricultural setting.	A detailed landscape and visual assessment is included in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			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]**. Further mitigation measures relating to construction and decommissioning are secured in **the Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.
WR-LSTC-005	Ecology and Biodiversity	Land Parcel 4 lies within a Core Sustenance Zone for Barbastelle bats, linking it functionally to confirmed and likely maternity colonies in the wider East Pye landscape.	The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase.
WR-LSTC-006	Ecology and Biodiversity	The proposed development would introduce extensive arrays and fencing, lighting, CCTV, inverter infrastructure, prolonged construction disturbance and fragmentation of functionally linked habitat.	The bat activity surveys undertaken for the Scheme are reported in **ES Volume 3, Appendix 8.6 – Bat Activity Survey Report [APP-157]** with an assessment of the likely significant effects set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. This confirms that roosting and foraging/commuting barbastelle bats are of National importance, and that subject to secured avoidance and mitigation measures there will be no likely significant effects to barbastelle bats. Measures for the protection of roosting bats in trees are included in **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050]**. Further mitigation measures are set out in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline LEMP [REP1-064]**. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats; ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and

ID	Theme	Comments/Issues Raised	Applicant's Response
			approved in accordance with the relevant Requirements of the **Draft DCO [REP1-014]**.
WR-LSTC-007	Ecology and Biodiversity	The Council says East Pye Solar has recognised the area as of national importance for bats but has not demonstrated that disturbance or damage to breeding/resting places can be excluded. The Council says it has not been demonstrated that any European Protected Species licence would be grantable, including maintenance of favourable conservation status.	The Applicant refers to its response to WR-LSTC-006.
WR-LSTC-008	Ecology and Biodiversity Water Environment	Site 4 lies in a highly sensitive chalk-stream and chalk-aquifer catchment and the area around Long Stratton has recorded significant flooding incidents. The River Tas catchment supports white-clawed crayfish and the Council says there are no records post-2016; aquatic surveys were carried out when stream and ditches were dry.	The Applicant notes the historic flooding incidences in the vicinity of the Order Limits. The Scheme will incorporate appropriate flood risk mitigation (freeboards of infrastructure above modelled floodplains/anticipated flood depths and inclusion of surface water runoff management) so that flood risk is not increased at the Order Limits or elsewhere, as set out and secured within the **Design Principles, Parameters and Commitments [REP1-078]**. Since the initial submission, the Applicant has independently engaged with Norfolk Rivers Trust and received information confirming an extant population

ID	Theme	Comments/Issues Raised	Applicant's Response
			of white-clawed crayfish at a site within the wider River Tas catchment. The Applicant will update the relevant sections of **ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP-160]** at Deadline 3 to reflect this additional baseline information. These additional records do not identify the species within the Order Limits, and the habitat surveys undertaken within the Order Limits concluded that the surveyed reaches were unsuitable or of low suitability for white-clawed crayfish. Therefore, the additional records do not alter the identified impact pathways or conclusions of the assessment. The sensitivity of the wider River Tas catchment was already recognised, and secured avoidance, biosecurity, pollution prevention and sediment control measures would avoid or minimise potential effects. Significant effects on white-clawed crayfish therefore remain not anticipated. The Applicant provided further information in the **Applicant's Position Statement on White-Clawed Crayfish [PDA-007]**.
WR-LSTC-009	Water Environment	Construction and operation of Land Parcel 4 would introduce ground disturbance, runoff changes, possible sediment mobilisation, cable works, construction	The Scheme incorporates pollution mitigation and surface water management measures for all phases as set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		traffic and potential pollutant pathways into the River Tas catchment.	As described in **ES Volume 1, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** the Sources of Potential Contamination (SPC) within Site 4 are limited to a former refuse tip (SPC4). The Tier 1 Preliminary Risk Assessment within Appendix 16.1 assesses the risks associated with SPC4 to surface water and groundwater receptors as Moderate, noting that this risk is potentially present regardless of the construction of the Scheme, as the landfill is assumed to not benefit from an engineered liner and therefore to operate on the 'dilute and disperse' principle. The baseline condition is that contamination associated with this SPC could be leaching out into the surrounding water environment. As shown on Sheet 10 of the **Works Plan Part 2 [REP1-006]** the only works proposed in the area of the former refuse tip are Works 10 – Works to create and maintain habitat management areas. As these works will not involve substantial ground disturbance, the baseline in this area will be maintained. The risks associated with the refuse tip will be assessed in greater detail as part of the post-consent ground investigation and associated interpretative Generic Quantitative Risk Assessment.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-LSTC-010	Soils and Agriculture	Land Parcel 4 comprises approximately 101 hectares of agricultural land, including Grade 2 Best and Most Versatile land, used for productive crops. The Council considers the loss of food-producing agricultural land during a period of food insecurity to be unacceptable.	Sites 4a and 4b contain land of Grade 2, Subgrade 3a, Subgrade 3b, Grade 4 and non-agricultural land. Loss of BMV land across the entirety of East Pye OL is limited to 28.9ha. land not subject to permeant works will be returned to agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. The effect upon agricultural land is considered in **ES Chapter 15, Section 15 [APP-051]**, yield and economic benefits can be illustrated using recognised agricultural budgeting books. ES Chapter 15 has used Nix Farm Management Pocketbook 56th Edition (2025), since the time of writing the 57th edition has been published. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. Furthermore, 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. The area of agricultural land in Norfolk is about 417,633ha. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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.
WR-LSTC-011	Transport and Access	The application relies on out-dated and inconsistent mapping around Long Stratton and the Working Plan is on an	The Applicant acknowledges that some plans and figures submitted with the Application used base mapping which did not show the Long Stratton Bypass. However, the Applicant has considered the

ID	Theme	Comments/Issues Raised	Applicant's Response
		outdated base map that does not include the Long Stratton Bypass.	Long Stratton Bypass as part of the assessments presented in the Environmental Statement, where appropriate. At Deadline 1, the Applicant updated the Works Plans, Location Plan, Streets Plan, Access and Public Rights of Way Plan and other relevant plans using the most up-to-date Ordnance Survey base mapping available, which shows the Long Stratton Bypass.
WR-LSTC-012	Transport and Access	The Council says the Scheme risks severe direct and indirect impacts on Long Stratton residents and businesses and that the proposed routes are unsuitable for construction HGVs and AILs.	The Applicant does not agree that the Scheme would result in severe direct or indirect impacts on Long Stratton arising from construction traffic. As shown in **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**, construction HGV traffic serving the Scheme is proposed to utilise the Long Stratton Bypass and would therefore avoid passing through Long Stratton itself. The Applicant also notes that AIL movements are proposed primarily for the delivery of cable route drums and are expected to be infrequent. AIL movements would be subject to specific traffic management and safety measures, as set out within Section 6 of the **Outline CTMP [REP1-068]**, with further detail to be provided through the detailed Construction Traffic Management Plan secured through DCO Requirement 15. As such, this document must be approved by the relevant local

ID	Theme	Comments/Issues Raised	Applicant's Response
			authority in consultation with the relevant highway authorities.
WR-LSTC-013	Transport and Access	Flowerpot Lane is described as heavily used and unsuitable for the number of HGV movements proposed, with risks to residents, pedestrians and schoolchildren.	The Applicant does not agree that Flowerpot Lane would be subject to the HGV and AIL traffic as described. As shown on **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**, Flowerpot Lane does not form part of the proposed HGV or AIL route network associated with the Scheme.
WR-LSTC-014	Transport and Access	The Council says the proposal would increase congestion, noise and road safety risks and could compromise emergency-service access.	The Applicant acknowledges the concerns raised regarding potential effects on congestion, road safety and emergency access. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023) and were not identified as resulting in significant effects. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to minimise impacts on other highway users and maintain access during the construction period. Further detail regarding traffic management measures and emergency access arrangements would be provided

ID	Theme	Comments/Issues Raised	Applicant's Response
			within the detailed Construction Traffic Management Plan secured through the DCO requirements.
WR-LSTC-015	Noise and Vibration	Noise pollution from construction traffic is considered unacceptable and operational noise, particularly low-level inverter and substation noise, is a concern in a quiet rural setting.	The Applicant acknowledges concerns regarding construction traffic noise and the potential audibility of operational equipment within a quiet rural environment. Construction traffic noise has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, using the construction traffic flows presented in the transport assessment. Construction vehicle movements will be managed in accordance with the **Outline CTMP [REP1-068]**, while measures to minimise noise from construction activities and associated vehicle movements are secured through the **Outline CEMP [REP1-058]**. Construction traffic effects would be temporary and limited to the construction period. The assessment concludes that construction traffic would result in short-term negligible to minor adverse effects, which are not significant. Operational noise from the solar inverters, Project Substations, National Grid Substation and other operational equipment has also been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, supported by **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-**

ID	Theme	Comments/Issues Raised	Applicant's Response
			179]. The assessment takes account of the low existing background sound levels and the combined contribution from the relevant operational plant. The evening period has been considered separately in the **Evening Noise Assessment [REP1-101]**, including the contribution from the BESS, National Grid and Project Substations and solar inverters. The final equipment and layout will be subject to detailed design. The **Outline OEMP [REP1-060]** secures measures including at residential receptors other than those closest to the BESS, the secured control requires the overall free-field rating level from the Scheme not to exceed the background sound level or 30 dB $L_{Ar,Tr}$, whichever is higher. Specific controls also apply at the receptors nearest the BESS. These limits provide an objective basis for controlling operational noise in the context of the existing rural sound environment. The assessments conclude that, with the identified mitigation and controls in place, significant adverse noise effects are not anticipated.
WR-LSTC-016	Air Quality	The Council raises concern about additional CO2 emissions from HGVs and abnormal loads travelling through the community, which it considers would be the responsibility of the Scheme.	The applicant acknowledges the concern regarding additional CO_2 from HGVs. Construction traffic emissions, including HGVs and abnormal loads, have been included within the Scheme's greenhouse gas assessment. Section 6.10.1 and 6.10.2 in the **ES Volume 1, Chapter 6 -**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Climate Change [APP-042] outlines that conservative assumptions have been made for CO_2 emissions from HGV's and that the scheme will incorporate embedded mitigation measures where possible to reduce GHG emissions.
WR-LSTC-017	Scheme Description	The cable corridor is due to run alongside the new bypass, an area that has been landscaped, and the Council considers it should not be dug up again.	The Order Limits and CRC 4 have been developed so that they do not overlap with the Landscape Masterplan for the Long Stratton Bypass.
WR-LSTC-018	Socio-Economics	The Council considers 1,213 hectares of solar panels in the rural area will make it more difficult for property, businesses and the community and could affect the appeal of Long Stratton. The energy generated would go to the national grid and the Council says the project does not benefit the community in a way commensurate with the negative impact on residents.	The Applicant notes that Order Limits extend to 1,213 Ha, but a substantial proportion is given over to landscape mitigation, cable route corridor (which is underground) and other temporary works. Notwithstanding, **ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects. These effects are not significant in EIA terms, so the Applicant does not consider that the appeal of Long Stratton will be affected.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant refers to its response provided to NEE-001 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** regarding the distribution of energy produced by the Scheme.
WR-LSTC-019	Cumulative Effects, In-Combination Impacts	Land Parcel 4 must be assessed in combination with major planned growth at Long Stratton, including new homes, extensive housing development, associated infrastructure, altered traffic flows, lighting, drainage changes and cumulative pressure on the settlement edge. The Council says cumulative effects with Long Stratton's growth make Land Parcel 4 significantly more harmful than it would otherwise be.	The Applicant refers to its response to WR-GMPC-004 regarding assessment of cumulative effects.
WR-LSTC-020	Concluding remarks	Long Stratton Town Council considers Land Parcel 4 particularly unacceptable and asks the Examining Authority to reject the applicant's site-specific need case and refuse Land Parcel 4.	The Applicant notes the Council's concluding remarks and refers to its response at WR-LSTC-001 in relation to the need for the Scheme and the inclusion of Site 4.

2.7 Morningthorpe and Fritton Parish Council

Table 2.7 Applicant's response to Morningthorpe and Fritton Parish Council [REP1-235] and [REP1-435]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-MFPC-001	Need for the Scheme Site Selection, Alternatives and Design Evolution	MFPC does not oppose the principle of renewable energy generation or the transition to a low carbon electricity system. Its objection concerns the location, scale, design and assessed effects of the East Pye Solar Scheme, with particular emphasis on Site 5. MFPC's case is that Site 5 and its setting contain an unusually concentrated combination of sensitive residential, landscape, heritage, ecological, agricultural and water-environment receptors, yet the Applicant has not demonstrated that concentrating major power-generating infrastructure there represents the least harmful or most appropriate solution.	The Applicant refers to its response to MFPC-003 in **the Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-MFPC-002	EIA Methodology	MFPC identifies reliance on interdependent technical assessments, extensive use of outline mitigation and post-consent management plans, design flexibility under the Rochdale Envelope,	The Applicant refers to its response to Brooke Parish Council in Table 2.1 of this document under WR-BPC-026 regarding the mitigation and control measures secured through the outline management plans.

ID	Theme	Comments/Issues Raised	Applicant's Response
		limited sensitivity testing, insufficient Site 5-specific assessment and inadequate consideration of effects from the receptor's perspective. Residents do not experience traffic, noise, vibration, visual change, lighting, loss of tranquillity and disruption to footpaths as separate technical chapters; these effects can occur together and successively. Where an assessment depends on future surveys, detailed design, management plans, monitoring or corrective action, MFPC asks the ExA to establish the assumptions, triggers for intervention, who verifies compliance and what happens if mitigation does not work.	The Scheme has been assessed using the Rochdale Envelope approach, with the maximum parameters secured through the Design Principles, Parameters and Commitments and Requirement 5 of the **Draft DCO [REP1-014]**. The Environmental Statement assesses the reasonable worst-case scenario within these parameters, with the final detailed design required to remain within the assessed envelope. The in-combination effects between the significant effects identified in individual topic chapters in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055].** The Applicant also confirms that the mitigation measures contained within the various management plans listed at Schedule 12 to the **Draft DCO [REP1-014]** are secured through the Requirements at Schedule 2 and the various approval and consultation provisions therein. Breach of a requirement would constitute a criminal office for which the Applicant (or any subsequent undertaker pursuant to Article 37) would be liable.
WR-MFPC-003	Consultation and Engagement	Availability of material is not necessarily the same as practical accessibility. MFPC asks whether residents lacking digital skills or equipment could identify, navigate and understand documents relevant to them.	The Applicant's Community Relations team has been available to assist members of the public via a series of free-to-use communication channels (phone, post and email). These channels were publicised through newspaper adverts and press releases, on the

ID	Theme	Comments/Issues Raised	Applicant's Response
			Applicant's website, in consultation materials and on-site notices. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-033]**, which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents. The **Guide to the Application [EXAM/1.3]** summarises the documents which form the application and has been updated at Deadline 2.
WR-MFPC-004	Landscape and Visual	Fritton, Morningthorpe and the historic manor of Boyland have medieval origins and the present landscape retains the relationship between villages, churches, lanes, fields, hedgerows, trees and archaeological remains. MFPC asks the ExA to assess the effect on the relationship between historic field patterns, routeways, mature hedgerows, veteran trees and archaeological	The Applicant agrees with Morningthorpe and Fritton Parish Council in that Fritton, Morningthorpe and the historic manor of Boyland have medieval origins. The Applicant disagrees that the archaeological remains within the Scheme contribute to the relationship between the villages, churches, fields, historic routeways, mature hedgerows and veteran trees which are present within the landscape today. The archaeological remains identified within the north-western corner of Sub-Site 5A, as detailed

ID	Theme	Comments/Issues Raised	Applicant's Response
		evidence, rather than only visibility from selected viewpoints.	within **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]**, have been dated to the medieval period and are likely directly related with the archaeological sites of Boyland Deserted Medieval Village (DMV) (HER 10168) and the 13th century Boyland Hall (HER 39694) which lie outside the Scheme boundary to the north, as detailed within **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]**.
WR-MFPC-005	Scheme Description Landscape and Visual	Site 5 would be more than a solar array and is described as one of the Scheme's principal operational hubs, including a 400kV Project Substation, solar panels, electrical plant, access, construction and maintenance infrastructure, fencing, CCTV and lighting. MFPC's concern is the combined transformation of open agricultural countryside into a long-term electricity generation and transmission complex immediately adjoining a historic village landscape.	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 including those at Site 5. The Applicant considers Site 5 comprises a series of small to medium sized open arable fields, these divided by a series of hedgerows and remnant hedgerows with hedgerow trees. The landscape is gently undulating to flat and sloping and includes two small to medium sized woodland groups, Long Plantation and Streetsend Plantation. Whilst the farmland is open the surrounding vegetation creates a series of framed views with the woodland creating a degree of containment and backdrops to views.
WR-MFPC-006	Site Selection, Alternatives and Design Evolution	MFPC says Site 5 evolved from land presented predominantly for solar arrays into a major electrical infrastructure hub,	The Applicant refers to its response to MFPC-003 and 004 in **the Applicant's Response to Relevant**

ID	Theme	Comments/Issues Raised	Applicant's Response
		with the 400kV Project Substation increasing from approximately 2 hectares to approximately 3.5 hectares. MFPC argues that design evolution demonstrates intensification rather than successful avoidance of harm.	**Representations Part 4 – Parish Councils [PDA-011]**.
WR-MFPC-007	Site Selection, Alternatives and Design Evolution	MFPC asks why the change in grid-connection strategy did not lead to a transparent reassessment of the overall layout and whether Site 5 remained the optimum location for the Project Substation and associated infrastructure.	The Applicant refers to its response to MFPC-003 and 004 in **the Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-MFPC-008	Site Selection, Alternatives and Design Evolution	MFPC questions the weight placed on land availability and willing landowners and asks for transparent comparison of alternative layouts, alternative substation locations and reduced-development scenarios.	The Applicant refers to its responses to Action Points 2, 3 and 19 in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP-098]**. Action Points 2 and 3 address the role of land availability and willing landowners within the site selection process, while Action Point 19 addresses the consideration of alternatives to the Project Substation proposed within Sub-Site 5A. The Applicant also refers to **ES Volume 1**, **Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**.
WR-MFPC-009	Need for the Scheme	MFPC accepts the climate benefit of renewable electricity in principle but asks whether existing climate and	The Applicant refers to its response to MFPC-001, MFPC-003, MFPC-006, and MFPC-008 in **the Applicant's Response to Relevant**

ID	Theme	Comments/Issues Raised	Applicant's Response
		environmental functions of Site 5 have been adequately assessed.	**Representations Part 4 – Parish Councils [PDA-011]**.
WR-MFPC-010	Water Environment Ecology and Biodiversity	MFPC identifies Countryside Stewardship agreements, mature hedgerows and trees, agricultural soils, habitat connectivity and natural drainage as existing climate-related assets.	The Applicant recognises the importance of existing hedgerows, trees, soils and drainage features as climate resilience assets. In particular, Section 6.8.6 of **ES Volume 1, Chapter 6 - Climate Change [APP-042]** responds to retention of existing vegetation where practicable. The chapter concludes that the impact with embedded mitigation measures that no significant climate change risks during the construction, operation and maintenance, and decommissioning phases have been identified.
WR-MFPC-011	Landscape and Visual	The Applicant's own assessment identifies significant adverse landscape and visual effects at relevant Site 5 receptors. MFPC considers effects greater and more extensive than selected assessment points suggest.	The Applicant notes the comment. The Applicant undertook considerable consultation with the South Norfolk District Council 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 sampling every view. The Applicant therefore considers that the existing view locations set provides sufficient information to assess residual visual effects and the Applicant does not agree that the view location coverage is insufficient to assess

ID	Theme	Comments/Issues Raised	Applicant's Response
			reasonable worst-case effects on route-based receptors. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** concludes a range of significant adverse effects in relation to Site 5 including on the landscape character and features of Site 5 at year 15, however visual effects reduce to non-significant levels as a result of the design approach and proposed mitigation.
WR-MFPC-012	Landscape and Visual	MFPC identifies omissions in the residential visual assessment, including Boyland Hall and Prestons Barn, and questions measuring separation to dwelling footprints rather than residential curtilage.	The Applicant refers to its response to Q1.11.1 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.
WR-MFPC-013	Landscape and Visual	Screening can reduce visibility but cannot preserve the existing open rural character once the land itself has changed use.	The Applicants notes the response. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			tree and woodland planting. These measures will assist in integrating the Scheme within the landscape and provide visual screening. As set out to South Norfolk Council in response to its Local Impact Report under LIR-SNC-104, the introduction of additional features into this landscape are not incohesive with existing features and wider perceptions of openness would be retained. However, the Applicant agrees that the establishment of mitigation planting at Year 15 should not automatically be assumed to remove a landscape or visual effect, but also 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 as reported in the **Applicant's LVIA [APP-043]** taking account of the resulting landscape and visual composition.
WR-MFPC-014	Public Rights of Way	Public Rights of Way are important not simply as transport routes but for tranquillity, open views, wildlife, heritage	**ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the visual amenity effects on the PRoW as a receptor including sequential effects, with

ID	Theme	Comments/Issues Raised	Applicant's Response
		and connection between settlements. Temporary closure or eventual reopening does not itself preserve that experience.	affected length of PRoW and direction of travel considered where required. Mitigation measures and management of traffic and access are set out in the **Outline CTMP [REP1-068]** and **Outline OTMP [APP-202]** and the management of PRoW is described in **Outline PRoWPPMP [APP-203]** to minimise impacts as far as practicable. These outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. Detailed CTMP, OTMP and PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with Requirements 15, 16 and 17 of the **Draft DCO [REP1-014]**.
WR-MFPC-015	Ecology and Biodiversity	MFPC's ecological concerns include nationally important Barbastelle bats, other bats, Skylark, Turtle Dove, Lapwing, Great Crested Newts, Badgers, the River Tas chalk-stream system, White-clawed Crayfish, hedgerows and wider habitat connectivity.	An assessment of the likely significant effects of all listed potential ecological receptors is set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** with avoidance and mitigation measures, where relevant and required, detailed in **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050].**
WR-MFPC-016	Transport and Access	MFPC asks whether the 317 tonne/69.6 metre AIL case, access geometry,	The Applicant acknowledges the concerns raised regarding the suitability of the proposed AIL strategy.

ID	Theme	Comments/Issues Raised	Applicant's Response
		structures, nursery location and constrained rural highway network have been demonstrated to be physically and safely deliverable rather than merely manageable through traffic controls.	The proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs. Section 6 of the **Outline CTMP [REP1-068]** sets out the framework for the management of AIL movements, including the traffic management and safety measures that would be implemented to facilitate these movements. These measures include the use of escort vehicles and other appropriate controls to ensure AIL movements can be undertaken safely. The Applicant therefore considers that the proposed AIL strategy has been developed to ensure that AIL movements are physically achievable and can be undertaken safely on the proposed route network.
WR-MFPC-017	Transport and Access	Access Point A24 opposite Jack in the Box Nursery is of particular concern because prolonged construction activity would take place beside babies and very young children using outdoor spaces.	The Applicant acknowledges the concerns raised regarding the proximity of construction activity to the nursery. Access 24 serves Sub-Sites 5A and 5B, as identified within Table 3.1 of the **Outline CTMP [REP1-068].** Construction traffic accessing these areas would be required to travel between the B1527 and Access 24 and would not utilise the nursery access for turning, waiting or any other construction-related activity. The Applicant further notes that Figure 2.1 of the **Outline CTMP [REP1-068]** indicates that construction activities within Sub-Sites 5A and 5B

ID	Theme	Comments/Issues Raised	Applicant's Response
			would occur during a defined period within the overall construction programme rather than throughout the full construction phase. The Applicant therefore does not consider that construction traffic associated with Sub-Sites 5A and 5B would result in prolonged construction activity immediately adjacent to the nursery for the duration of the Scheme's construction.
WR-MFPC-018	Noise and Vibration	MFPC identified seven residential properties omitted from the construction-noise assessment, four receptors within the construction-vibration assessment distance, six residential properties within the construction traffic noise assessment distance and approximately 70 residential properties within 500 metres of Site 5 for operational noise. If receptors within the Applicant's own assessment criteria have not been properly assessed, MFPC considers there must be serious doubt over whether reported impacts on those living closest to Site 5 are reliable.	The Applicant has previously responded to this matter in its response to comment VC-003 in the **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP1-099]**. That response explains the use of representative noise-sensitive receptors and addresses the assessment of construction noise, construction vibration, construction traffic noise and operational noise in relation to Site 5. The Applicant therefore refers the respondent to that response.
WR-MFPC-019	Soils and Agriculture	MFPC asks whether long-term consequences for Grade 2 Best and Most Versatile land, soils, agricultural capability, carbon storage, drainage and restoration	The effects upon agricultural land are considered in **ES Chapter 15 [APP-051]**. Permanent loss of BMV land across the scheme is limited to 28.9ha. land not subject to permeant works will be returned to

ID	Theme	Comments/Issues Raised	Applicant's Response
		have been adequately demonstrated and secured.	agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. Decommissioning is outlined in the **Outline SRMP [APP-204]**. The outline SRMP sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014]**. The Outline SRMP provides the structure and the types of controls to be included within the detailed SRMP. The outline SRMP sets out an outline of the matters that need to be defined or secured. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade. Monitoring procedures are outlined in the outline SRMP. The monitoring procedures to be included as a minimum are outlined from paragraphs 4.2.30 to 4.2.35 of the Outline SRMP.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Compaction will be monitored by inspecting the soils following the installation of the piles but prior to the installation of the PV panels, if compaction is found this will be remediated whilst the ground remains accessible. Compaction will be monitored during and after decommissioning works, if compaction is found this will be remediated once ground conditions permit, in line with the detailed SRMP. Any compaction that occurs during the operational phase and decommissioning phase will be remediated following the decommissioning stage. The land will be handed back to the respective landowners following decommissioning. There are currently no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade.
WR-MFPC-020	Water Environment	MFPC asks whether the River Tas catchment, Site 5 watercourses, historic culvert, groundwater, public/private water supplies and private foul drainage have been assessed using a complete and verified baseline.	The Applicant refers to its response to MFPC-010 and MFPC_011 in **The Applicants Response to Relevant Representation Part 4 - Parish and Town Councils, Parish Meetings and MPs [PDA-011]**,
WR-MFPC-021	Electromagnetic Fields	MFPC challenges whether the EMF assessment is sufficiently Site 5-specific and asks for consideration of the combined operation of the 400kV Project Substation, transformers, inverters,	Cumulative EMF field strengths are dependent on factors including equipment configuration and separation distances. Given that EMF levels diminish exponentially within a short distance, and the electromagnetic fields for infrastructure associated

ID	Theme	Comments/Issues Raised	Applicant's Response
		switching equipment and underground cable network.	with the Scheme for Site 5 at receptors are shown to be within and below the acceptable exposure limits as presented in **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**, and no significant impact is predicted.
WR-MFPC-022	Utilities	MFPC questions whether proposed access crossings, heavy vehicles, vibration, compaction and construction activity can be undertaken without unacceptable risk to existing buried water and utility assets.	An assessment of the likely effects on utilities is provided in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054].** Utilities data has been incorporated into the design of the Scheme and appropriate buffers will be embedded into the design. **The Outline CEMP [REP1-058]**, sets out measures to reduce potential impact on identified utilities. In advance of construction, the Applicant will liaise with all utility providers with assets in the Order Limits regarding construction timelines, activities, proximity to assets and construction management measures. Once infrastructure is in place, risk to the identified utilities is considered minimal. In addition, the **Draft DCO [REP1-014]** includes protective provisions for the protection of electricity, gas, water and sewerage undertakers, operators of electronic communications code networks, and drainage authorities.
WR-MFPC-023	Glint and Glare	MFPC identifies a potential inconsistency where glint-and-glare screening is relied	Vegetation screening for road users along the B1527 is relied on to mitigate instances of sustained glare.

ID	Theme	Comments/Issues Raised	Applicant's Response
		upon along the B1527 while permanent access points and visibility splays may create gaps in that screening.	Where gaps are implemented to provide access points to the Scheme, the potential impacts are not considered significant due to being fleeting in nature and not sustained.
WR-MFPC-024	Construction and Decommissioning	MFPC questions broad assumptions about future waste generation, recycling rates and treatment/recycling capacity over a 60-year lifespan and at decommissioning.	The assessment of waste volumes, replacement requirements, and disposal pathways is assessed in Section 18.5 of **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**. The Applicant has sought to provide a suitably conservative estimate of likely waste streams based on the current Scheme design and current waste handling practices and capacity, to ensure the assessment identifies the worst-case effects likely to be generated by the Scheme. The Applicant has committed to minimising waste through the application of the waste hierarchy and the provision of a Site Waste Management Plan through **Outline CEMP [REP1-058]**, secured by Requirement 13 of Schedule 2 to the **Draft DCO [REP1-014]**.
WR-MFPC-025	Human Health	MFPC asks for the combined experience of noise, traffic, air quality, landscape, recreation and socio-economic effects to be considered for residents closest to Site 5.	The Applicant acknowledges the request that the combined experience of noise, traffic, air quality, landscape, recreation and socio-economic effects should be considered for residents closest to Site 5. These effects have been considered within the Human Health Summary Statement contained within **ES Volume 1, Chapter 18, Other Environmental Matters [APP-054]**, which was prepared to bring together the findings of the Environmental Statement

ID	Theme	Comments/Issues Raised	Applicant's Response
			and consider the combined influence of transport and access, noise, air quality, landscape and visual effects, recreation, and socio-economic effects on health and wellbeing. The assessment acknowledges that nearby residents may experience multiple changes simultaneously, particularly during construction and early operation, and considers whether these combined influences could alter the overall health and wellbeing outcome. In addition, **Equality Impact Assessment [APP-214]** considered the interaction between access to nature, recreation, landscape and visual amenity, neighbourhood change, community severance, traffic, noise, air quality, social participation and mental wellbeing, including for groups who may be more vulnerable to these effects. The Human Health Summary Statement concludes that, taking account of embedded mitigation and management measures detailed in Sections 18.6.78 to 18.6.91) and secured via the **Draft DCO [REP1-014]**, the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. While some adverse effects remain for certain receptors, particularly in relation to landscape and visual change (see section 18.6.122), the assessment does not identify a likely significant

ID	Theme	Comments/Issues Raised	Applicant's Response
			adverse health effect arising from the combined experience of noise, traffic, air quality, landscape, recreation and socio-economic pathways for residents living closest to the Scheme, including those in proximity to Site 5.
WR-MFPC-026	Cumulative Effects, In-Combination Impacts	MFPC asks the ExA not to consider Site 5 or East Pye Solar in isolation and raises cumulative effects at both regional and local scales. At the local level, residents experience a single environment and MFPC asks the ExA to consider combined effects on landscape, heritage, ecology, agricultural land, water, traffic, Public Rights of Way, noise, air quality, residential amenity, health and wellbeing. MFPC's objection is not based on any single impact, but on the cumulative case that the Scheme, including Site 5, gives rise to significant adverse effects, has intensified through its evolution and remains supported by assessments that contain gaps or defer necessary information	The Applicant refers to its response to WR-GMPC-004 regarding cumulative and in-combination effects.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-MFPC-027	Policy compliance Need for the Scheme	National need for renewable energy does not establish a need for this Scheme in this location.	The Applicant refers to its response to ID MFPC-003 in T**he Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-MFPC-028	Concluding remarks	MFPC considers the Applicant has not demonstrated that the Scheme, including Site 5 infrastructure, is necessary in its proposed location and form, that reasonable alternatives have been properly considered, or that harm has been avoided and reduced as far as reasonably possible.	The Applicant notes MFPC's concluding remarks and refers to its responses to WR-MFPC-001 to WR-MFPC-027, which address the matters raised in relation to the need for the Scheme, Site 5, reasonable alternatives, design evolution and the avoidance and mitigation of environmental effects.
WR-MFPC-029	Site Selection, Alternatives and Design Evolution	Site 5 contains many of the very constraints the Applicant says should be avoided: sensitive landscape, nationally important heritage, high-quality agricultural land, ecology and nearby homes. Yet the Applicant has not demonstrated that Site 5 is the least harmful location.	The Applicant refers to its response to VC-002 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-099]** which responds specifically to MFPC's concerns regarding the suitability and site selection of Site 5, including landscape, heritage, agricultural land, ecology and proximity to residential properties.
WR-MFPC-030	Noise and Vibration	MFPC's review identifies seven residential properties omitted from the construction-noise assessment, four from the vibration assessment distance and six from the highway noise distance. Approximately 70 residential properties lie within 500 m of	The Applicant refers to its response to WR-MFPC-018.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Site 5 for operational noise and have been omitted.	
WR-MFPC-031	Glint and Glare	Glint-and-glare mitigation along the B1527 requires screening in locations where permanent access points A23 and A24 and visibility splays are proposed.	Vegetation screening for road users along the B1527/A23 and A24 is relied on to mitigate instances of sustained glare. Where gaps are implemented to provide access points to the Scheme, the potential impacts are not considered significant due to being fleeting in nature and not sustained.
WR-MFPC-032	Transport and Access	There are concerns that the visibility splays have been based on shorter AILs than the specialist transport company states are required.	The Applicant notes the comment and can confirm that visibility splays are not determined based on the length of a vehicle including AILs. They are derived primarily from vehicle speeds along with driver perception-reaction time and braking deceleration performance. The Applicant can also confirm that AILs will be subject to the management measures as set out in the **Outline CTMP [REP1-068].**
WR-MFPC-033	Landscape and Visual	The Applicant's own assessment identifies significant adverse visual effects; for residents these are the everyday landscape experienced from homes, lanes and Public Rights of Way.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices identifies a range significant adverse effect on individual receptors at defined phases. The assessment process is intended to identify and explain the significance of effects on those receptors through professional judgement.
WR-MFPC-034	Cultural Heritage	Fritton Conservation Area and Grade I listed churches sit within a landscape that	The Applicant refers to its response provided in Morningthorpe and Fritton Parish Council's relevant representation [RR-1373] in **The Applicant's**

ID	Theme	Comments/Issues Raised	Applicant's Response
		forms part of their setting. Screening is not the same as preserving setting. Historic field patterns, lanes, hedgerows, mature trees and archaeology survive today and the open farmland forms the setting of Fritton Conservation Area and the Grade I listed Church of St Catherine.	**Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]** under MFPC-013 MFPC-014, as well as within **The Applicant's Response to Procedural Deadline A and Additional Submissions [REP1-103]** under comment MFPC-PDA-004.
WR-MFPC-035	Cumulative Effects, In-Combination Impacts	The community will not experience Site 5 in isolation. Cable corridors, Site 4B, access to Site 7 via The Krons and construction traffic on the B1527 add to the same local burden.	The Applicant notes that the effects highlighted are related to the construction which is short term in duration and following completion of this phase the construction activity and vehicle movements would cease, and the cable corridor would be restored in the short term and would not be perceivable. For road users travelling along Bungay Road there would be sequential views of Site 5 and Site 4 in the operational phase.
WR-MFPC-036	Transport and Access	Access Point A24 is opposite Jack in the Box Nursery, creating prolonged construction activity beside babies and very young children throughout the day.	The Applicant acknowledges the concerns raised regarding the proximity of construction activity to the nursery. Access 24 serves Sub-Sites 5A and 5B, as identified within Table 3.1 of the **Outline CTMP [REP1-068].** Construction traffic accessing these areas would be required to travel between the B1527 and Access 24 and would not utilise the nursery access for turning, waiting or any other construction-related activity. The Applicant further notes that Figure 2.1 of the **Outline CTMP [REP1-068]** indicates that

ID	Theme	Comments/Issues Raised	Applicant's Response
			construction activities within Sub-Sites 5A and 5B would occur during a defined period within the overall construction programme rather than throughout the full construction phase. The Applicant therefore does not consider that construction traffic associated with Sub-Sites 5A and 5B would result in prolonged construction activity immediately adjacent to the nursery for the duration of the Scheme's construction.
WR-MFPC-037	Construction and Decommissioning	Residents may experience successive periods of HGV movements, excavation, trenching, piling, noise, dust and vibration. Management plans may reduce those impacts but do not remove them.	The Applicant acknowledges that construction activities may result in temporary disturbance. Construction traffic and HGV movements will be managed through the **Outline CTMP [REP1-068]**, including defined routes, delivery scheduling and traffic management measures. Noise and vibration from activities including piling, groundworks and construction traffic will be controlled through the **Outline CEMP [REP1-058]**, including best practicable means, selection of less noisy equipment where practicable, acoustic enclosures, temporary screening and working hour restrictions. Dust mitigation is also secured through the Outline CEMP. Detailed CEMP and CTMPs will be approved prior to construction through the **Draft DCO [REP1-014]**.
WR-MFPC-038	Public Rights of Way	Temporary closures and later reopening of Public Rights of Way do not mean	The Applicant refers to its response to WR-MFPC-014.

ID	Theme	Comments/Issues Raised	Applicant's Response
		those routes will be experienced in the same way.	
WR-MFPC-039	Ecology and Biodiversity	Residents have raised concerns about bats including Barbastelle, farmland birds and habitat fragmentation.	The bat activity surveys undertaken for the Scheme are reported in **ES Volume 3, Appendix 8.6 – Bat Activity Survey Report [APP-157].** A breeding bird survey was undertaken on land within the Order Limits and is detailed in **ES Volume 3, Appendix 8.4 Breeding Bird Survey Report [APP-155].** An assessment of the likely significant effects on these two ecological receptors is set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** Measures for the protection of roosting bats in trees and farmland breeding birds (specifically a Skylark Mitigation Strategy) are included in **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050].** Further mitigation measures are set out in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline LEMP [REP1-064].**
WR-MFPC-040	Water Environment	Residents have raised concerns about watercourses, the chalk aquifer, drainage, private water supplies, private sewage systems and flooding.	The Applicant refers to its response to MFPC-010 and MFPC-011 in **The Applicants Response to Relevant Representation Part 4 Parish and Town Councils, Parish Meetings and MPs [PDA-011].**
WR-MFPC-041	Consultation and Engagement	MFPC asks that the examination process remain genuinely accessible to residents who do not use the internet.	The Applicant notes this comment. The Examination timetable and format of the hearings is a matter for the Examining Authority.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant's Community Relations team has been available to assist members of the public via a series of free-to-use communication channels (phone, post and email). Members of the public are welcomed to use these channels to ask about application documents, as well as how to access and read Scheme maps.
WR-MFPC-042	Cumulative Effects, In-Combination Impacts	Residents will experience traffic, noise, dust, vibration, landscape change, disruption to footpaths and loss of tranquillity together, not as separate technical issues.	The in-combination effects between the significant effects identified in individual topic chapters are assessed in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055]**.
WR-MFPC-043	Concluding remarks	MFPC submits that the Applicant has not demonstrated that the harm arising from Site 5 is unavoidable or justified.	The Applicant refers to its response to MFPC at VC-013 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-099]** which addresses MFPC's position that the harm arising from the Scheme has not been demonstrated to be unavoidable or justified.
WR-MFPC-044	Site Selection, Alternatives and Design Evolution	MFPC asks how East Pye's fragmented, multi-site site-selection and land-assembly approach is reconciled with Island Green Power's stated preference at The Droves for single continuous sites with as few landowners as possible.	The Applicant refers to Action Point 2 of the Written Summary of the **Applicant's Oral Submissions and Responses at Issue Specific Hearing 1** and **Response to Action Points [REP1-098]** which in turn refers to the Applicant's response to ExQ1

ID	Theme	Comments/Issues Raised	Applicant's Response
			Q1.3.2 in the **Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]**, addressing the relative influence of landowner willingness and land availability in the identification and selection of the Order Limits.
WR-MFPC-045	Construction and Decommissioning Scheme Description	MFPC asks whether the Site 5 construction compound would serve Site 5 only or also support Sites 7A–F, including material deliveries, storage and personnel, and what this would mean for local roads, nearby homes and businesses.	The Applicant can confirm that the compound in Sub-Site 5 would only serve the works undertaken in Sub-Site 5.
WR-MFPC-046	Construction and Decommissioning	The Applicant has summarised Morningthorpe and Fritton Parish Council's request for a Community Liaison Group. This request covered the following: The Parish Council supports a Community Liaison Group (CLG) provided it is a genuine, independent forum for two-way engagement, problem-solving and accountability. It seeks broad representation from affected parish councils, local authorities, contractors and the applicant, with meaningful opportunities for residents and community groups to participate.	The Applicant notes this comment and refers to its answer provided to the Examining Authority regarding the Community Liaison Group under Q1.1.12 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The Council requests transparent governance arrangements, including consideration of an independent chair, publicly available records, accessible communication methods and clear issue-tracking processes. The CLG should proactively address construction and operational impacts, provide forward planning information, investigate recurring issues, and not replace statutory enforcement routes. The Council also requests that affected parish councils receive appropriate support for participation costs, that engagement is proportionate to the level of local impact, and that the key CLG arrangements are secured through enforceable DCO mechanisms and remain in place until construction and reinstatement activities are complete.	

2.8 Saxlingham Nethergate Parish Council

Table 2.8 Applicant's response to Saxlingham Nethergate Parish Council [REP1-234] and [REP1-442]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SNPC-001	Site Selection, Alternatives and Design Evolution	Saxlingham Nethergate Parish Council strongly objects to the application and considers Land Parcel 7 affected by multiple interacting constraints that render it undeliverable in practice and in law. The Council considers reliance on Land Parcel 7 materially undermines the deliverability and viability of the East Pye Solar Scheme.	The Applicant refers to its response to SNPC-007 and SNPC-011 in **The Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-SNPC-002	Cultural Heritage	Saxlingham Nethergate is an ancient village with two Conservation Areas, multiple Grade II and Grade II* listed buildings, walls and a War Memorial, many with shallow or no foundations.	The Applicant agrees that Saxlingham Nethergate is an ancient village and contains multiple designated and unlisted heritage assets.
WR-SNPC-003	Transport and Access	The Council strongly objects to the proposed AIL route through the village and its two Conservation Areas and requests a full topographical survey of Church Hill and pre-construction structural surveys of listed buildings along the route. Narrow unclassified roads, in some places less than three metres wide, have few passing places and high banks, walls and	The Applicant acknowledges the concerns raised regarding the proposed AIL route through Saxlingham Nethergate and the suitability of the local highway network. The Applicant notes that construction HGV traffic is not proposed to travel through Saxlingham Nethergate and that the route identified is proposed only for infrequent AIL movements.

ID	Theme	Comments/Issues Raised	Applicant's Response
		railings and are considered unsuitable for sustained HGV and AIL use. The Council considers the AIL haulage units wider than much of the current road, higher than overhanging vegetation and too long to negotiate turns without significant verge, hedgerow and tree removal and ditch filling.	The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle Swept Path Assessment (SPA) work based on the transformer specification and associated abnormal load vehicle configuration for the route through Saxlingham Nethergate. The drawings are provided in **part three of the Transport Assessment, ES Volume 3 Appendix 11.1 [APP-176] pages 58-60.** The purpose of these drawings is to provide an understanding of the works Wynns have conducted to date to ensure safe passage for the transportation of the required AILs for the Scheme. The SPA provides a positive result for the negotiation of AIL access in Saxlingham Nethergate, including: • No loadings will be implemented onto these areas as the vehicle tracking will remain within the tarmacked highway. • Wynns have been made aware that residents are understandably concerned that their private properties are requiring adaptation works. However, to confirm, Wynns have tracked the vehicle and there are no requirements for any remedial works to private property. • The war memorial within Saxlingham Nethergate is located on the outside of the left-hand bend manoeuvre and the vehicle will not conflict with this, or the surrounding green. The vehicle may oversail the area of tarmac footpath between the

ID	Theme	Comments/Issues Raised	Applicant's Response
			highway tarmac and green to a small extent, but no loadings will be placed onto this verge. • The vehicle is anticipated to be within close proximities of street furniture in various locations. The Applicant has therefore included the full highway boundary extent within the Order limits in this area. Temporary removal and re-instatement of these is commonplace for movements of this nature and will be carried out in accordance with the DCO powers. • Trimming/pruning of foliage to the side and above of the highway is also anticipated, however this will be managed with the owner's consent where required and conducted by a qualified arborist. • There is no requirement to make any amendments to the roadway, footpaths, pavements, or any third-party land, walls, gateways or structures. Should the SPAs have recommended that this may have been required, the route would have been disregarded and an alternative route would need to be sourced. • The references to TTROs in the drawing commentary are in error and the DCO powers would be implemented in lieu, for example the traffic regulation measures (Article 16) to manage vehicle use or the Power to alter layout, etc., of streets (Article 10) to manage street furniture.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SNPC-004	Transport and Access	The Council asks that no single-track roads be approved for construction use and asks the ExA to visit Church Hill and Saxlingham Green to see the implications of the proposed AIL route.	The Applicant acknowledges the concerns raised regarding the proposed AIL route through Saxlingham Nethergate and the suitability of the local highway network. The Applicant notes that construction HGV traffic is not proposed to travel through Saxlingham Nethergate and that the route identified is proposed only for infrequent AIL movements. The proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs, who undertook site visits and route assessments to inform the proposed AIL strategy. Following these assessments, Saxlingham Nethergate was identified as an appropriate route for AIL movements. AIL movements are expected to be infrequent and occur only on a limited number of occasions during the construction period. Further information regarding the proposed AIL strategy is provided within the Applicant's response to WR-SNPC-003.
WR-SNPC-005	Water Environment	Saxlingham Nethergate floods regularly; fields 7D and 7F flood and the road through the village, culverts and ditches also flood.	The Applicant notes the historic flooding issues within Saxlingham Nethergate. Sub-Sites 7D and 7F will consist of Solar PV Arrays which will be raised on narrow supports at an appropriate freeboard above ground level/anticipated flood depths. The ground beneath the arrays will be grass cover and therefore will mimic the existing drainage regime. A Project Substation is proposed within Sub-Site 7F which will incorporate a lined surface water drainage

ID	Theme	Comments/Issues Raised	Applicant's Response
			system with a controlled discharge to the nearest ditch as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. As such, the Scheme will not increase flood risk elsewhere.
WR-SNPC-006	Water Environment	The Council considers deep culverts with railings close to the road make the proposed AIL route impassable for heavy loads.	The Applicant notes the concerns raised regarding the suitability of the proposed AIL route. Please refer to the Applicant's response to WR-SNPC-003 and WR-SNPC-004, which explains that the proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs, who undertook site visits and route assessments to inform the proposed AIL strategy. The Applicant notes that construction HGV traffic is not proposed to travel through Saxlingham Nethergate and that the route identified is proposed only for infrequent AIL movements. The Applicant therefore considers that the proposed AIL route has been appropriately assessed and that suitable traffic management and safety measures would be implemented to facilitate AIL movements where required.
WR-SNPC-007	Ecology and Biodiversity	Land Parcel 7 lies entirely within overlapping Core Sustenance Zones for Barbastelle bats and directly adjoins ancient woodland confirmed to support maternity colonies.	The Applicant refers to its response to Long Stratton Town Council under WR-LSTC-005 in Table 2.6 within this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The Council considers the Barbastelle impact landscape-scale functional habitat use that cannot be addressed through buffers, planting or construction timing. The Council considers there is no credible evidence that an EPS licence could be granted for Land Parcel 7 and the Applicant has not identified a workable alternative layout or strategy.	
WR-SNPC-008	Ecology and Biodiversity	Land Parcel 7 directly adjoins the River Tas chalk stream within a catchment supporting breeding populations of white-clawed crayfish. The Council says no downstream crayfish surveys have been included and no lawful or credible construction methodology has been demonstrated for cabling, trenching, HDD, haulage, compaction, sediment and pollution risk.	The Applicant notes the Examining Authority's (ExA) request, in the Rule 6 letter **[PD-005]**. The Applicant has provided an update on this at Procedural Deadline A within the document **Applicants Position on White Clawed Crayfish [PDA-007]**. If in the unlikely event that the species was recorded within watercourses within the Order Limits, adopted precautionary avoidance measures already mitigate impacts upon the species, and as a consequence the impact assessment conclusions would remain unchanged.
WR-SNPC-009	Ecology and Biodiversity	No botanical survey has been carried out for Land Parcel 7 despite known importance for rare and priority plant species associated with long-established grassland and roadside verges. The Council says absence of botanical survey means the layout cannot be	This scope of surveys has been agreed through EIA scoping and stakeholder consultation, as described in Section 8.2 of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** An extended habitat survey (UKHab methodology) has been undertaken as reported in **ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152]**. This records

ID	Theme	Comments/Issues Raised	Applicant's Response
		lawfully finalised, construction impacts cannot be properly avoided or mitigated and BNG claims cannot be substantiated.	the findings of a desk-based study and the detailed survey and mapping of habitats (including grassland and hedgerow habitats) identified within the Order Limits. During this extended habitat survey, there was no evidence to suggest that further targeted botanical surveys are required. Habitats avoidance/mitigation measures during construction and operation of the Scheme are secured in the **Outline LEMP [REP1-064]** including commitments for grassland protection and reinstatement. A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out.
WR-SNPC-010	Ecology and Biodiversity	Great Crested Newts have been recorded on ponds and water areas on Site 7 and within the buffer zone, while some ponds and the Cable Route Corridor have not been adequately surveyed.	The mitigation strategy for great-crested newt set out within **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050]** addresses likely impacts upon GCN. This species has been assessed within **Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** following surveys which are detailed in **ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [REP1-048].** The Applicant has considered the impacts to GCN as part of the embedded design set out in **Design Principles, Parameters and Commitments [REP1-078]** with 50m buffers being applied to ponds which

ID	Theme	Comments/Issues Raised	Applicant's Response
			support GCN and 30m of all other ponds where GCN were absent. Where a pond was not surveyed due to access issues, a precautionary approach has been taken by including a 50m buffer as with ponds where GCN presence was confirmed.
WR-SNPC-011	Ecology and Biodiversity	The Council says seasonal surveys for Lapwing, Skylark, Turtle Dove and other protected wildlife are inadequate and that cumulative effects on farmland birds should be considered.	This scope of surveys has been agreed through EIA scoping and stakeholder consultation, as described in Section 8.2 of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** A breeding bird survey was undertaken on land within the Order Limits and is detailed in **ES Volume 3, Appendix 8.4 Breeding Bird Survey Report [APP-155].** An assessment of the likely significant effects on breeding birds is set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** with no significant effects associated with either construction and decommissioning phases. The formal scoping process, scoped out the impacts upon breeding birds during the operational phase, however, skylarks specifically were included within the assessment, with moderate beneficial effects anticipated during the operational phase. Measures for the protection of farmland breeding birds (specifically a Skylark Mitigation Strategy) are included in **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-**

ID	Theme	Comments/Issues Raised	Applicant's Response
			050]. Further mitigation measures are set out in the **Outline LEMP [REP1-064].**
WR-SNPC-012	Utilities	Land Parcel 7 contains underground rural fibre-optic broadband infrastructure which the Council says has not been mapped, consulted on or assessed for diversion, protection or outage risk. A high-pressure gas main runs across Land Parcel 7F and passes close to the proposed substation, creating fire and explosion safety concerns.	See the Applicant's response to WR-MFPC-022 regarding utilities.
WR-SNPC-013	Utilities	The Council notes that National Gas Transmission has objected to the Scheme due to lack of communication.	The Applicant is currently in discussions with National Gas Transmission and will continue to engage throughout the development of the Scheme to agree the necessary protective provisions. A **Statement of Common Ground with National Gas Transmission [REP1-092]** was submitted at Deadline 1.
WR-SNPC-014	Soils and Agriculture	Sites 7D and 7F contain Best and Most Versatile agricultural land and the Council objects to its loss.	Site 7D contains a small area of Grade 2 land in the north of the site, the majority of Site 7D is Subgrade 3b land quality. Site 7F consists of Grade 2 and Subgrade 3a land quality. Within Site 7F a Substation is to be located with a maximum compound area of 0.75ha, this is situated on land of Grade 2 and Subgrade 3a quality. It is expected that the substation sites will be restored to the same ALC, as set out in **ES Chapter 15, Section**

ID	Theme	Comments/Issues Raised	Applicant's Response
			8 [APP-051]. There is to be no permeant loss of BMV land within Sites 7D and 7F. The land within Sites 7D and 7F are subject to temporary works and will be restored at the end of the scheme's lifecycle (60 years).
WR-SNPC-015	Landscape and Visual	Solar arrays, the 132kV substation, security fencing, CCTV and access tracks would replace uninterrupted views across open countryside with industrial infrastructure. Landscaping would take at least 15 years to establish and the Council considers screening itself an intrusion into the historic open landscape.	Technical assessments within the **ES [APP-042 to APP-056] including the Applicants LVIA [APP-043]** 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 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, 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			extent to which the Scheme would alter it, including landscape mitigation as shown on the **Green Infrastructure Strategy [REP1-013].** The approach 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. As set out in LIR-SNC-104 the introduction of additional features into this landscape are not incohesive with existing features and wider perceptions of openness would be retained.
WR-SNPC-016	Public Rights of Way	The Boudicca Way and multiple footpaths and bridleways run alongside and between land parcels; the Council considers fencing and infrastructure would harm their rural character and use. The Council raises safety concerns for equestrians from security fencing and narrow confined corridors with no escape route.	**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 consideration of the description of the

ID	Theme	Comments/Issues Raised	Applicant's Response
			Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** which includes all components of the Scheme. The Applicant notes the Council's concern regarding the potential effect of security fencing on equestrian users of the bridleway. However, the Scheme design does not create a narrow or enclosed corridor adjacent to the route. In accordance with the **Design Principles Parameter and Commitments [REP1-078]** a minimum offset is proposed to the Scheme to reduce the creation of confined corridors**.** This offset ensures that users experience an open margin rather than being confined between fencing and development infrastructure. The stand-off also provides separation from operational infrastructure and reduces the sense of enclosure that might otherwise arise where fencing is located immediately adjacent to a Public Right of Way. The offset area provides a suitable buffer between the bridleway and the security fencing and allows space for riders to manoeuvre if required. The bridleway would remain open and unobstructed throughout operation of the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the proposed landscape strategy has been designed to maintain a pleasant recreational environment whilst avoiding excessive enclosure. Existing vegetation is retained where practicable and supplementary planting is proposed where appropriate to assist integration of the Scheme into the landscape. The Applicant therefore considers that the proposed setback distance, together with the retention of existing landscape features and provision of green infrastructure, would avoid unacceptable effects on equestrian safety or amenity.
WR-SNPC-017	Noise and Vibration Landscape and Visual	The Council considers the proposals unacceptably close to residential areas and says residents of the care home on Saxlingham Green would be severely affected by construction traffic and loss of tranquillity.	In accordance with the **Design Principles Parameter and Commitments [REP1-078]** a minimum offset is proposed to residential properties of 50m but a case-by-case review is undertaken and often this has been increased**.** To support the understanding of effects the Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in **ES Volume 2, Appendix 7.8 – Residential Visual Amenity Assessment [REP1-046]**, undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019) to consider effect on visual amenity from properties within a defined perimeter of the Scheme parameters.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The assessment concludes that construction traffic noise would result in short-term negligible to minor adverse effects, which would not be significant, including on the routes serving the Scheme. The assessment of construction traffic noise is presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The assessment concludes that construction traffic noise would result in short-term negligible to minor adverse effects, which would not be significant, including on the routes serving the Scheme.
WR-SNPC-018	Socio-Economics	The Council considers industrialisation of the landscape would have a very negative impact on tourism and the tranquillity for which Norfolk is valued.	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects. These effects are not significant in EIA terms.
WR-SNPC-019	Water Environment	The Council raises concerns about private water supplies and private sewage systems, including effects from altered runoff, soil compaction, sediment and pollutants.	The Applicant refers to its response to Long Stratton Town Council under WR-LSTC and to Kirstead Parish Meeting under WR-KPM-004 in this document regarding information on surface water runoff management and pollution management.

ID	Theme	Comments/Issues Raised	Applicant's Response
			For information relating to private water supplies and private sewerage, the Applicants previous refers its response to Saxlingham Nethergate Parish Council under SNPC-015 in **The Applicants Response to Relevant Representation Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011]**.
WR-SNPC-020	Noise and Vibration	The Council says no noise assessments have been carried out on Cable Route Corridors, internal haul roads, trenching, HDD and AIL/HGV routes.	The Applicant does not agree that these matters have not been assessed. Potential noise and vibration effects from the Cable Route Corridors, trenching, HDD and the construction of internal access and haul roads are considered in **ES Volume 1, Noise and Vibration [APP-048]**, supported by **ES Volume 3, Appendix 12.2, Noise Modelling and Calculations [APP-179]**. HDD was assessed quantitatively as a representative trenchless installation activity, including potential daytime and night-time working. Open-cut trenching and cable installation would progress incrementally along the Cable Route Corridors and would therefore be temporary and transient at individual receptors. Construction of internal access and haul roads was also assessed at representative separation distances. HGV movements on the public highway were assessed using forecast construction traffic flows for the relevant road links. AIL and other construction vehicle movements will be managed through the **Outline CTMP[REP1-068]**. Construction noise and

ID	Theme	Comments/Issues Raised	Applicant's Response
			vibration will also be controlled through the **Outline CEMP Plan [REP1-058]**. The Applicant therefore considers that these activities have been assessed proportionately, focusing on representative activities and locations with the greatest potential to result in significant effects.
WR-SNPC-021	Water Environment	The Council questions the volume and source of water required for panel cleaning and wheel washing and the consequences of tanker movements and runoff into waterways and ditches.	**ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]** assesses the water demand for the Operation and Maintenance Phase. A potable and non-potable water supply demand balance can be reached with embedded mitigation. Water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, on-site water storage and water tankering (to meet peak demand). Tankering is the preferred method of supply. The Applicant will continue conversations with local tankering suppliers to confirm that they are able to supply the water to reach peak demand.
WR-SNPC-022	Waste	The Council questions where damaged PV panels, batteries, cables and other components would be disposed of and whether adequate authorised treatment capacity exists.	Waste arising from the Scheme is assessed in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**. Under the current legislation, the WEEE Regulations 2013 and Waste Batteries and Accumulators Regulations 2009, waste electrical equipment and batteries are required to be collected, treated, recovered, and disposed in an environmentally sound manner. This is under the financial responsibility of the manufacturer or

ID	Theme	Comments/Issues Raised	Applicant's Response
			supplier of that equipment, but may be undertaken by a designated authorised reprocessor, a list of whom should be established prior to the Operational Phase of the Scheme and kept up-to date throughout the operational and maintenance phase and decommissioning phase. This is secured through measures set out within the **Outline OEMP [REP1-060]**. The Applicant recognises that existing capacity is limited due to relatively low waste generation from Solar PV panels and BESS at present, however it is anticipated that facility capacity will expand with market demands. This is largely due to the high material recycling and recovery rate possible, driving a substantial market for recovered materials to re-enter the supply chain as part of a circular economy.
WR-SNPC-023	Socio-Economics	The Council notes that no permanent on-site staff would be required to operate the Scheme and questions claims of local jobs for local people.	**ES Volume 1, Chapter 14 – Socio Economics [APP-050]** assesses socio-economic effects for each phase of the Scheme. These are summarised in Table 14.28. For the Construction and Decommissioning Phases, the effect on Jobs, Employment and Supply Chain (Resident-based) is assessed as negligible; this reflects the small size of the workforce drawn from the local area in relation to the resident workforce (see Table 14.22 and accompanying text).

ID	Theme	Comments/Issues Raised	Applicant's Response
			For the Operation and Maintenance Phase, the effect on Jobs, Employment and Supply Chain is assessed as Minor Beneficial (not significant). The Socio-Economics chapter does not therefore make a claim of significant 'local jobs for local people'. Significant positive effects are identified, however, with respect to workplace-based employment in the Construction and Decommissioning Phases, and on Skills and the Labour Market in all three Phases (Table 14.28).
WR-SNPC-024	Cumulative Effects, In-Combination Impacts	The Council considers there is no credible construction scenario for Land Parcel 7 because ecological licensing, chalk-stream construction, botanical baseline and infrastructure protection issues remain unresolved.	The Applicant refers to its response to SNPC-014, SNPC-015 and SNPC-016 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-SNPC-025	Concluding remarks	The Council considers Land Parcel 7 fails on multiple independent and compounding grounds, including harm to Conservation Areas and listed buildings, protected species, high-pressure gas infrastructure, SSSI risk, residential proximity, Public Rights of Way and Countryside Stewardship habitats.	The Applicant refers to its response to SNPC-017 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-SNPC-026	Need for the Scheme	The Parish Council strongly objects to the proposal because, if approved, it would industrialise a large part of the parish,	The Applicant notes the Council's support for the need for green energy in a sensible and planned way.

ID	Theme	Comments/Issues Raised	Applicant's Response
		while supporting the need for green energy in a sensible and planned way.	The Applicant refers to its response to ID SNPC-006 in **the Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-SNPC-027	Consultation and Engagement	The consultation methods caused considerable distress and anxiety and the unnecessarily complex and voluminous documents, coupled with absence of hard copies for many elderly residents without computers, excluded people from the process.	The Applicant notes this comment and refers to its response to Saxlingham Nethergate Parish Council under comment SNPC-004 in **The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**. In summary, the Applicant has provided several ways in which members of the public can access DCO application documents. This includes hosting USB memory sticks at local libraries, making them available in hard copy format on request by contacting the Applicant's free-to-use communication channels, and sending USB memory sticks to individuals upon request. The Applicant's **Section 56 Notice [OD-003]** provided further information on obtaining DCO Application documents.
WR-SNPC-028	Application Documentation	The Parish Council says the complex and layered application plans sit uncomfortably with the absence of realistic detail for many components and the generalisations in the draft DCO.	The Applicant refers to its responses at MH-002 and MH-003 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-100]** address concerns regarding the complexity and accessibility of the application documentation and the level of

ID	Theme	Comments/Issues Raised	Applicant's Response
			detail provided within the **Draft DCO [REP1-014]** and application documents.
WR-SNPC-029	Legal	The Parish Council welcomed confirmation that the Applicant was not seeking to acquire land from the War Memorial and Old Rectory frontage and clarified that the footpath alongside the War Memorial is not part of the public highway.	The Applicant acknowledges the comment raised.
WR-SNPC-030	Transport and Access	The Parish Council objects to the AIL haul route and use of narrow village roads for delivery vehicles because of potential damage to pipes, culvert walls and listed buildings with no foundations.	The Applicant refers to its response to WR-SNPC-003, WR-SNPC-004 and WR-SNPC-006 in this document.
WR-SNPC-031	Cultural Heritage	The Parish Council objects to impacts on the character and appearance of both Saxlingham Nethergate and Saxlingham Green Conservation Areas and proximity of panels to houses on the Green.	The Applicant refers to its response to SNPC-001, SNPC-017 and SNPC-029 in T**he Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**.
WR-SNPC-032	Water Environment	The Parish Council is concerned the proposals will increase flooding along The Street and frontage houses that flooded in December 2020 and says Sites 7D and 7F are within the relevant watercourse catchment.	The Applicant refers to its response to WR-SNPC-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SNPC-033	Soils and Agriculture	The Parish Council objects to loss of Best and Most Versatile agricultural land at a time of reduced crop yields and food-security concerns.	The Applicant notes this comment and refers to its response to Long Stratton Parish Council under WR-LSTC-010 in this document.
WR-SNPC-034	Utilities	The Parish Council is concerned the Applicant submitted the application without properly consulting and incorporating the formal views of National Gas Transmission.	The Applicant has engaged with, and received feedback from National Gas Transmission plc, as set out within Section 12.6, Table 13.1, and Section 13.4 of the **Consultation Report [APP-024]**. The Applicant continues to engage with all statutory parties and parties with interest in the Scheme, including National Gas Transmission plc. A **Statement of Common Ground with National Gas Transmission** was submitted at Deadline 1 **[REP1-092]**.
WR-SNPC-035	Concluding remarks	The Parish Council asks that Site 7 be excluded from the Order.	The Applicant does not agree that Site 7 should be excluded from the Order and refers to its response at SNPC-007 in **The Applicant's Response to Relevant Representations Part 4 -Parish and Town Councils, and Parish Meetings [PDA-011]**.

2.9 Seething Parish Council

Table 2.9 Applicant's response to Seething Parish Council [REP1-273]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SEPC-001	Need for the Scheme	Seething Parish Council recognises the need for urgent transition from fossil fuels to renewable energy, but considers this must minimise impacts on local communities and heritage and should benefit long-established ecosystems. The overall size of the development, encompassing approximately 1,100 hectares of agricultural land, is considered excessive, especially at a local scale. The impact of other regional NSIP energy schemes and sizeable local proposals on communities, heritage, landscape and ecosystems must be recognised.	The Applicant notes the Council's recognition of the need for urgent transition from fossil fuels to renewable energy. The Applicant refers to its response to ID SePC-002 in **the Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]**, with the cumulative schemes considered identified in **ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116].**
WR-SEPC-004	Soils and Agriculture	The repurposing of Grade 2 agricultural land for solar PV is considered an unacceptable risk to food security. The Applicant's own survey identifies large areas of proposed PV and battery sites as high-quality Grade 2 soils and	The Applicant notes this comment and refers to its response to Long Stratton Council under WR-LSTC-010 in this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the Council considers these highly productive soils should be protected.	
WR-SEPC-006	Landscape and Visual	The placement of 4.5 m high tracker arrays close to housing, Public Rights of Way or sites visible to communities is considered unacceptable. PV units should be positioned sympathetically in relation to sight lines and existing geography to minimise adverse visual impact.	The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances to the Scheme from residential properties and PRoW. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**.
WR-SEPC-008	Public Rights of Way	Preservation of existing native trees, hedgerows, pastures and associated water bodies, particularly along Public Rights of Way, is considered essential for both screening and ecosystems.	The Applicant notes this response. The **Green Infrastructure Strategy [REP1-013]** has been developed and includes retention of existing features including ponds hedgerows and trees, alongside proposed measures which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) new tree and woodland planting, grassland and ghost pond restoration.
WR-SEPC-009	Ecology and Biodiversity	The Council considers it wholly unacceptable to remove or damage native flora that currently screens proposed solar PV sites.	The Applicant is committed to retaining native flora as far as practicable, with trees and hedgerows taken into consideration in the design process and losses minimised. The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances within the design

ID	Theme	Comments/Issues Raised	Applicant's Response
			for the trees and hedgerows that will be retained. In addition the **Green Infrastructure Strategy [REP1-013]** has been developed and includes a range of proposed measures such as strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) new tree and woodland planting, grassland and ghost pond restoration. 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]**.
WR-SEPC-010	Public Rights of Way	The proposal must not impede existing Public Rights of Way and should also respect historic rights of way evident on older OS maps.	The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances to the PRoW network. The definitive PRoW network and offsets are identified on the **Green Infrastructure Strategy [REP1-013]**.
WR-SEPC-011	Ecology and Biodiversity	Solar PV areas should be managed as meadow or pasture for grazing and regular herbicide spraying is considered unacceptable.	As included in the **Outline LEMP [REP1-064]** grazing is a management option which is being explored, alongside mowing. Further detail provided within the LEMP (secured by Requirement 7 of the **Draft DCO [REP1-014])** and updated as appropriate in subsequent iterations. Herbicide may be used, but only where required to control injurious/invasive species. The application technique would look to minimise the use of

ID	Theme	Comments/Issues Raised	Applicant's Response
			herbicides as far a practical, e.g. through spot spraying. Herbicide use guidance is secured through the **Outline LEMP [REP1-064]**.. It is considered that this limited potential use of herbicides, is minor in comparison to the regular spraying of herbicides throughout the agricultural parcels within the Order Limits which is currently adopted as part of the intensive agricultural land management employed currently.
WR-SEPC-012	Soils and Agriculture	The Council considers ground screws or similar non-destructive and removable structures should be used rather than concrete foundations to minimise soil damage.	Concrete bases are to be used for the BESS, Conversion Units and potentially some mounting structures where archaeological protection requires non-ground penetrative techniques. Concrete footings or bases do not exceed 1m in depth and the land under the concrete will be readily restorable, in accordance with the **Outline SRMP [APP-204]** and the detailed SRMP which is secured by Requirement 18 of the **Draft DCO [REP1-014].** For the majority of the panelled area pilings will be used which have little impact on the soil, as shown in Section 8 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**.
WR-SEPC-013	Transport and Access	Harvey Lane and Upgate Road are small rural single-carriageway roads considered wholly unsuitable for HGVs and exceptional vehicle loads.	The Applicant notes the concerns raised regarding the suitability of Harvey Lane and Upgate Road for construction traffic.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Exceptional load traffic routes must not necessitate damage and irreversible alteration to rural road networks, local architecture, heritage, watercourses and biodiverse roadsides.	The suitability of these routes informed the development of the construction traffic strategy and associated mitigation measures. Vehicle tracking assessments were undertaken to demonstrate that the proposed vehicle types could safely access the relevant parts of the Scheme using the proposed routes. For any proposed AIL movements, the routes were assessed by a specialist abnormal load transport consultant experienced in the movement of AILs. This assessment informed the development of the proposed AIL strategy and the identification of the routes shown on **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**. The Applicant also notes that, where appropriate, pre-construction condition surveys would be undertaken in accordance with Section 7.14 of the **Outline CTMP [REP1-068]**. The Applicant does not propose permanent damage to the local highway network. Nevertheless, where temporary alterations are required to facilitate construction traffic or AIL movements, any affected areas would be reinstated following completion of the relevant works and returned to their previous condition, where appropriate.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SEPC-015	Ecology and Biodiversity	The Council is concerned about the lack of strategy for wildfires potentially affecting and spreading within solar PV sites, especially during drought conditions.	Included within Section 4.4.3 – 4.4.5 of the **Outline BSMP [REP1-066]** stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: "*Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure*."
WR-SEPC-016	BESS Safety	Although distant from Seething, the Council shares serious concerns regarding fire-management strategies at BESS sites.	The Applicant notes this comment. BESS fire management strategies are further addressed within WR-TPC-010 and WR-TPC-011 of this document.
WR-SEPC-017	Climate Change	Evidence of benefit to local communities over and above reduction in national CO2 emissions should be demonstrated.	The Scheme will produce substantial renewable energy, supporting the local grid and strengthening energy security to the local community. These benefits extend beyond national carbon accounting and support local and regional climate and energy transition objectives. The need for the Scheme is set out within the **Statement of Need [APP-206]**.
WR-SEPC-018	Socio-Economics	The Council considers the most effective mitigation would be a guarantee of local and discounted energy security.	The Applicant notes this comment and refers to its response provided under BEN-001 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**.
WR-SEPC-019	Socio-Economics	An acceptable solar scheme should provide local employment opportunities	**ES Volume 1, Chapter 14 – Socio Economics [APP-050]** assesses socio economic effects for each phase of the Scheme. These are summarised

ID	Theme	Comments/Issues Raised	Applicant's Response
		and benefit the local economy rather than result in offshore profit generation. South Norfolk communities should be stakeholders rather than pawns in any such scheme.	in Table 14.28. Significant effects identified are Major or Moderate Beneficial on jobs in South Norfolk in the Construction Phase and Decommissioning Phase, and on Skills and the Labour Market in all three phases. No significant adverse effects are identified, with the temporary accommodation market and the tourism industry also assessed. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSCS [REP1-070]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [REP1-014]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme.
WR-SEPC-021	Concluding remarks	The Council considers the current proposal would have enormous adverse impacts on South Norfolk communities and compromises food security through unsupported repurposing of productive soils.	The Applicant does not agree that the Scheme would compromise food security. The Applicant refers to its response to SePC-004 in **The Applicant's Response to Relevant Representations Part 4: - Parish and Town Councils, and Parish Meetings [PDA-011**]. The potential effects of the Scheme on agricultural

ID	Theme	Comments/Issues Raised	Applicant's Response
			land, food production and the rural economy are assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The Applicant does not consider that food security would be compromised by the Scheme.

2.10 Shotesham Parish Council

Table 2.10 Applicant's response to Shotesham Parish Council [REP1-181], [REP1-292] and [REP1-293]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPC-001	Cultural Heritage	The landscape surrounding Shotesham, with its 23 heavily used footpaths, is an important part of the village's character and its conservation area designation.	The Applicant refers to its response to SPC-004, SPC-109-113, and SPC-117 in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**.
WR-SPC-002	Ecology and Biodiversity	Shotesham Little Wood forms part of the Shotesham–Woodton Hornbeam Woods SSSI and supports a Barbastelle bat colony. A beck passing through Site 8B flows on to Shotesham Common SSSI. White-clawed crayfish, a protected and endangered species, are recorded in the River Tas. The Applicant should demonstrate that construction run-off and pollution from Site 8B would not harm this population.	The Applicant refers to embedded mitigation relating to surface water run-off in paragraphs 8.8.9 and 8.8.11 of **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, which will prevent run-off into the River Tas and watercourses that will flow into the SSSI. Further details shown how the Scheme has designed out impacts to nearby sensitive sites and Important Ecological Features through run-off control, pollution prevention and dust control during construction which will be secured by the **Outline CEMP [REP1-058]**.
WR-SPC-003	Water Environment	There are 18 homes with private borehole water supplies close to the sites.	SHPCs response appears to relate to "*sites 8A, 8B and part of site 7".* Assessment of the known groundwater abstractions, including Private Water Supplies (PWS), within 250m of Sites 7 and 8 is provided

ID	Theme	Comments/Issues Raised	Applicant's Response
			within **Environmental Statement Volume 3,: Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]**. The use of a 250m Study Area around any sub-Site being used for PV Arrays (i.e., Sites 7 and 8) for the identification of PWS was agreed with the Environment Agency following the Scoping Stage. It is not stated within SHPCs response which the 18 homes with PWS are and whether SHPC's assessment of "close" aligns with the Study Area utilised within the Applicant's assessment. If SHCP can provide further information in relation to specific PWS then a more detailed response can be provided.
WR-SPC-004	Ecology and Biodiversity	Two protected roadside nature verges, not shown on the East Pye map, would be destroyed by the proposed access road.	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 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.
WR-SPC-005	Site Selection, Alternatives and Design Evolution	As the representative body for Shotesham, the Parish Council's first concern is Sites 8A, 8B and part of Site 7. However, it considers the whole East	The Applicant notes this comment and refers to its detailed responses to Shotesham Parish Council's Relevant Representation [RR-1771] in **The Applicant's Response to Relevant Representations Part 4 - Parish and Town**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Pye Solar scheme to be misconceived and poorly prepared.	**Councils, and Parish Meetings [PDA-011**], which address the matters raised in relation to these Sites and the wider Scheme.
WR-SPC-006	Consultation and Engagement	The Parish Council was not invited to take part in the initial consultation. At pre-consultation meetings, East Pye Solar received a great deal of feedback about roads, listed buildings and other matters, but little or none of this was reflected at the consultation open meetings.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Shotesham Parish Council was notified of all phases of consultation and was identified as a host parish council within the core consultation zone as set out in the **Consultation Report [APP-024]**. The **Consultation Report [APP-024]** sets out how the Applicant considered all feedback received at each phase of consultation.
WR-SPC-007	Consultation and Engagement	The plans were, and still are, dense and often imprecise. They are incomprehensible to anyone other than experts, and many details will only become available after consent.	The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. USB memory sticks with the full suite of Application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Further details have been published on the Applicant's website. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request.
WR-SPC-008	Public Rights of Way	The application seeks broad powers over roads and public rights of way, including closures. These are likely to cause life-changing disruption across the many parishes involved.	The Applicant acknowledges the concerns raised regarding the potential use of powers relating to highways and Public Rights of Way. The Applicant notes that any temporary closures, restrictions or diversions would be implemented only where necessary and managed in accordance with the **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203]**. Where temporary restrictions are required for safety reasons, appropriate diversionary routes and management measures would be implemented to maintain access. No permanent changes to Public Rights of Way are proposed and, following completion of the relevant works, access would be reinstated along the existing routes. The Applicant does not agree that the temporary measures proposed as part of the construction of

ID	Theme	Comments/Issues Raised	Applicant's Response
			the Scheme would result in life-changing disruption across the affected parishes.
WR-SPC-009	Transport and Access	Only one road junction appears to have been studied in any detail, yet numerous unsuitable roads are proposed for use. Questions about the haul roads, and whether they must be permanent for maintenance, remain unanswered. This is significant for local landowners.	The Applicant has assessed the construction vehicle routes and 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-174-177], 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 and the management and mitigation measures for the Scheme. The Applicant can confirm that internal haul routes will be removed following construction. Within the solar sites maintenance tracks will be implemented to allow access to the panels and other installed equipment during operation.
WR-SPC-010	Lighting	Virtually the whole scheme lies in a currently quiet and dark landscape. The Parish Council questions whether noise described as insignificant would be insignificant in this part of South Norfolk.	The Applicant acknowledges the Parish Council's concern regarding the quiet rural character of the area. The conclusion that operational noise effects would not be significant does not mean that sound from the Scheme would necessarily be wholly inaudible at every location or at all times.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The noise assessment in **ES Volume 1 Chapter 12 Noise and Vibration [APP-048]** has been undertaken using measured background sound levels representative of the local area and has considered both the relationship between the predicted rating level and the prevailing background sound level and the absolute sound levels involved (based. In response to concerns regarding quieter rural conditions during the evening, the Applicant has also undertaken a supplementary assessment for the period 19:00–23:00, including consideration of private outdoor amenity spaces. The Applicant maintains that operational noise effects would be not significant in EIA terms, taking account of the existing rural sound environment, the contextual assessment and the mitigation and operational noise controls secured through the **Draft DCO [REP1-014].**
WR-SPC-011	Public Rights of Way	Footpaths such as Shotesham Footpaths 19 and 22, with their open aspect, would be permanently harmed. Mitigation planting would be completely out of character with this landscape. Because of the dispersed nature of the application, it affects thousands of people, including many in scattered homes outside village centres. It remains difficult to make people living	The trees to the north of SH-FP22 provide reinforcement of the hedgerow feature and provide screening of views from receptors to the north from Shotesham looking south. For SH-FP 19 and 22, **ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the effect on the visual amenity with affected lengths of PRoW and direction of travel considered. The Applicant considers the visual change to represent

ID	Theme	Comments/Issues Raised	Applicant's Response
		close to sites or along chosen routes aware of what the application would mean for them.	a perceptible contrast, resulting in a partial change to the view, which in accordance with the methodology does not result in a significant effect. The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.
WR-SPC-012	Consultation and Engagement	The published information is dense and obscure, and inaccessible to those without internet skills. Parishes have tried to fill this gap.	The Applicant refers to its response to MH-002 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-100]**, which addresses concerns regarding the complexity and accessibility of the application documentation, including access for those who do not use the internet. The Applicant has maintained free-to-use communication channels, including telephone, post and email, through which Interested Parties can seek information and assistance in relation to the Scheme and its application documents.
WR-SPC-013	Soils and Agriculture	The loss of farmland's ability to produce food, which is as necessary as electricity, is being ignored at a time when its importance is clear.	The Applicant notes this comment and refers to its response to Long Stratton Town Council under WR-LSTC-010 in this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPC-014	Ecology and Biodiversity Lighting	Shotesham Parish Council objects to the operational and construction lighting proposed for East Pye Solar. Shotesham Little Wood holds a large Barbastelle maternity colony identified by the Applicant's own surveys, and Barbastelles from that colony are recorded on Site 8 around 500 metres away. The proposed lighting relies on motion sensors that will be repeatedly triggered by wildlife, and its detailed design will not occur until after consent has been given. The Applicant has failed to state how far each lit compound lies from Shotesham Little Wood or the other maternity colonies, or whether any lies within those colonies' Core Sustenance Zones.	The Applicant refers to the principles set out in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151].** Construction works are anticipated to occur predominantly during the daytime. Night-time working will be avoided except during winter months or in specific circumstances (see **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. Any construction lighting will be temporary and limited to areas where specific tasks are being undertaken, and will be switched off once those activities are complete. Mitigation measures will also be implemented to minimise light spill beyond the Site and towards nearby sensitive receptors, including the use of visual barriers such as hoardings. Motion sensors will be configured to focus on human and vehicle movement and to disregard smaller or minor heat signatures. The sensors will also be appropriately positioned and targeted towards Site entrances and areas immediately adjacent to the Site boundaries, helping to limit unnecessary activation associated with wildlife movement. The mitigation and control measures set out in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** are secured through

ID	Theme	Comments/Issues Raised	Applicant's Response
			the **Outline CEMP [APP-196]** and the **Outline OEMP [APP-197].**
WR-SPC-015	Lighting	The Parish Council asks the Planning Inspectorate to ensure the Applicant commits to avoiding any lighting within the Solar PV areas during the operational phase. Passive infrared sensors cannot reliably distinguish a fox, badger, muntjac or roe deer from a person. The likely outcome is repeated on-off activation throughout the night. The application contains conflicting statements about dusk-to-dawn lighting and motion-sensing lighting needed to maintain safe working conditions in winter months. The Applicant must confirm which is correct. The application gives no timer duration, lux levels, column heights, number of luminaires or plan of where lights will be installed. The detailed lighting design is deferred until after consent.	The Solar PV Arrays, and the access roads to these Sites, will not require any lighting during the operational phase. Any maintenance to these would be undertaken during the day, however if any work is required at night then this will be temporary and follow the principles for construction lighting in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151].** Motion sensors will be configured to focus on human and vehicle movement and to disregard smaller or minor heat signatures. The sensors will also be appropriately positioned and targeted towards Site entrances and areas immediately adjacent to the Site boundaries, helping to limit unnecessary activation associated with wildlife movement. The mitigation and control measures set out in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** are secured through the **Outline CEMP [REP1-058]** and the **Outline OEMP [REP1-060].** The Applicant refers to its response to Q1.2.6 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**, which addresses lighting.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPC-016	Ecology and Biodiversity Lighting	No night-time lighting survey was carried out. Barbastelle flight lines between Shotesham Little Wood, the other maternity woods and the Sites have not been mapped against proposed compound locations or construction access routes. The Parish Council asks for visible lighting to be off by default, infrared or thermal CCTV, fixed lighting parameters, dark corridors, restrictions on construction lighting near maternity woods, activation logging and bat monitoring with remedial triggers.	The Applicant refers to the principles set out in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151].** During operation, lighting will remain switched off by default and will only be activated when the Site is occupied. Luminaires will be orientated inwards, with shielding incorporated where required to minimise light spill beyond the Site boundaries. Lighting will be controlled by motion sensors that are appropriately positioned, orientated and calibrated to minimise activation by minor heat signatures. These measures are secured within the **Outline OEMP [REP1-060]** which are secured by Requirements 14 of the **Draft DCO [REP1-014].**
WR-SPC-017	Human Health	Shotesham Parish Council is concerned that the effects of the Proposed Development on the physical and mental health of local people have not been properly assessed. Human health was scoped out of the Environmental Impact Assessment as a stand-alone topic. The Environmental Statement has no health chapter and does not draw together combined or long-term effects on health and wellbeing.	The Applicant does not agree that the effects of the Scheme on physical and mental health have not been assessed. Whilst the Planning Inspectorate's Scoping Opinion did not require a standalone human health chapter, the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** was prepared to bring together the health-related findings from across the Environmental Statement and consider the potential effects of the Scheme on physical, mental and social wellbeing, including combined

ID	Theme	Comments/Issues Raised	Applicant's Response
		Residents are already reporting anxiety and distress about the prospect of the Scheme. The things residents value and stand to lose include open views, access to the countryside, dark skies, tranquillity and the setting of historic homes and villages.	and cumulative effects. It considers relevant health pathways including transport and access, noise, air quality, landscape and visual effects, recreation, water environment and socio-economic effects. The Applicant acknowledges concerns regarding anxiety, distress and uncertainty associated with the Scheme, as well as concerns relating to open views, access to the countryside, dark skies, tranquillity and the setting of villages and historic assets. These matters have been considered through the Human Health Summary Statement and the **Equality Impact Assessment [APP-214]**, which recognises that changes to landscape character, visual amenity, access to nature, place attachment and perceived environmental change can influence wellbeing (see Table 8.2 of the Equality Impact assessment and section 18.6.11 of Human Health Impact Assessment). In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects, and supplements

ID	Theme	Comments/Issues Raised	Applicant's Response
			the Human Health Summary Statement and Equality Impact Assessment. Taking account of the Human Health Summary Statement, Equality Impact Assessment and **Mental Health and Wellbeing Addendum [REP1-107]**, the Applicant has not identified likely significant adverse effects on population health and wellbeing. This does not discount the concern or distress reported by individual residents, which has been considered as part of the assessment process.
WR-SPC-018	Noise and Vibration	Noise from inverters, transformers, battery storage cooling systems and substations will be more noticeable in quiet rural countryside, especially at night. The Parish Council asks whether the noise conclusion properly reflects how and where background noise was measured, tonal and low-frequency noise from plant and night-time effects on nearby homes.	The Applicant acknowledges that operational plant may be more noticeable within a quiet rural sound environment. The assessment in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** is based on site-specific environmental sound surveys, with measurement locations selected to represent nearby residential receptors. The assessment uses measured background sound levels, including night-time L_{A90} data, and considers the combined contribution from the inverters, transformers, BESS cooling systems and substations. Tonal and other acoustic characteristics were considered in accordance with BS 4142. **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]** explains the acoustic feature corrections adopted, including

ID	Theme	Comments/Issues Raised	Applicant's Response
			consideration of transformer hum and the broadband sound generated by cooling fans. Low-frequency noise from the BESS and substations was also assessed using daytime source levels against the more stringent night-time criteria in NANR45. Night-time and early-morning effects were assessed at nearby homes, including at a height representative of a first-floor bedroom window. A separate evening assessment is provided in the **Evening Noise Assessment [REP1-101]**. As the final plant has not yet been selected, the **Outline OEMP [REP1-060]** requires a further assessment at detailed design to demonstrate compliance with the secured noise limits. The Applicant therefore considers that the assessment appropriately reflects the rural background sound environment, plant characteristics and effects during the more sensitive periods.
WR-SPC-019	Human Health	The Parish Council asks the Examining Authority to require a health impact assessment covering physical and mental health and wellbeing, and to consult affected communities on it.	The Applicant acknowledges the Parish Council's request for a Health Impact Assessment covering physical and mental health and wellbeing. The Applicant considers that the information required to assess these matters has already been provided through Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214].**

ID	Theme	Comments/Issues Raised	Applicant's Response
			These assessments consider a broad range of health determinants, including noise, air quality, transport and access, landscape and visual effects, recreation, socio-economic effects, climate change, water environment and battery safety, and draw together the findings of the Environmental Statement to consider effects on physical, mental and social wellbeing. The assessments also consider whether effects may be experienced differently by potentially vulnerable groups, including older people and those with existing health conditions or wellbeing vulnerabilities. They recognise that some individuals may experience anxiety, concern or distress in response to perceived environmental change and uncertainty. However, neither assessment identifies likely significant adverse effects on population health or mental wellbeing (see section 18.6.265 of the Human Health Summary Statement and section 9.1.9 of the **Equality Impact Assessment [APP-214]**). In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative

ID	Theme	Comments/Issues Raised	Applicant's Response
			wellbeing effects, and supplements the Human Health Summary Statement and Equality Impact Assessment. The Addendum supports the conclusions of those assessments and concludes that significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups. The Applicant therefore does not consider that a further standalone Health Impact Assessment is necessary.
WR-SPC-020	Concluding remarks	Shotesham Parish Council asks the Examining Authority to consider each of Sites 8A, 8B and 7, determine whether adequate consideration has been given to mitigating the multiple harms to flood risk, amenity, habitats and landscape, and consider whether harms from Sites 8A and 8B should have been avoided altogether. It asks that the application be refused.	The Applicant refers to its detailed responses to Shotesham Parish Council's Relevant Representation [RR-1771] in the **Applicant's Response to Relevant Representations Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011]**, which address the matters raised in relation to site selection, flood risk, landscape and visual effects, ecology and biodiversity, and other environmental effects The Applicant also refers to its responses at JW-003 and JW-004 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-100]**, which address Shotesham Parish Council's concerns regarding the suitability, site selection and mitigation of Sites 8A and 8B.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant refers to the detailed response provided at Appendix A of **The Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline Procedural A [REP1-102].**
WR-SPC-021	Need for the Scheme	The Parish Council is not against solar power and recognises the role solar can play in meeting the energy needs of the country. It objects to this patchwork proposal and the harms it would cause to individuals, communities and the environment across a broad swathe of South Norfolk.	The Applicant notes that the Council is not against solar power and recognises the role solar can play in meeting the energy needs of the country. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

ID	Theme	Comments/Issues Raised	Applicant's Response
			In terms of the planning balance, and as set out in the **Planning Statement [REP1-074]**, with the critical and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse effects identified, including impacts to agricultural land, are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.
WR-SPC-022	Site Selection, Alternatives and Design Evolution	When the Applicant first announced the Scheme, the Parish Council was shocked to see Sites 8A and 8B included. It considered the area completely inappropriate and inconsistent with other solar schemes approved for Norfolk.	The Applicant refers to the detailed response provided at Appendix A of the **Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A [REP1-102].**
WR-SPC-023	EIA Methodology Site Selection, Alternatives and Design Evolution	Since the Council first raised concerns and noted obvious errors, the Applicant has attempted to add mitigation to limit the impact on the community and landscape. However, mitigation alone cannot correct poor site selection.	The Applicant refers to its response to Q.1.1.1 in The **Applicant's Response to the Examining Authority's First Written Questions [REP1-083],** which sets out how the mitigation hierarchy has been applied for each environmental topic.
WR-SPC-024	Site Selection, Alternatives and Design Evolution	The Site Selection Assessment is considered complex, poorly indexed and affected by errors and inconsistencies. The Council believes Sites 8A and 8B should not have passed East Pye's	The Applicant refers to the detailed response provided at Appendix A of the **Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A [REP1-102]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		initial screening for topography, flood risk and accessibility.	
WR-SPC-025	Site Selection, Alternatives and Design Evolution	The Council considers there may be preferable sites much closer to Great Moulton, where land tends to be flatter and population levels generally lower.	The Applicant refers to its response to Shotesham Parish Council at JW-004 in the **Written Summary of the Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses [REP1-100]**, which addresses the consideration of alternative sites closer to Great Moulton and the site selection of Sites 8A and 8B.
WR-SPC-026	Landscape and Visual	South Norfolk Council has adopted supplementary planning guidance on the susceptibility of the landscape to new energy infrastructure, designed to steer developers away from the most sensitive areas such as Sites 8A and 8B. The Council questions whether this was considered sufficiently early.	The Applicant notes the comment. The Applicant is aware of the document however it was published at the time the Application was made and therefore only the draft version was available to inform **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices. At the time of drafting the SPD excluded NSIP scale solar development. The Applicant disagrees that the guidance would aid site selection. The study considers the susceptibility for solar development (and other forms of supporting infrastructure) at the district landscape character scale. It concludes that for all relevant district landscape character areas within south Norfolk that the susceptibility is Medium-High or High for large and very large scale solar development.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPC-027	Water Environment	The Applicant has consistently misrepresented the level of flood risk in this area. Market Lane is prone to significant flash flooding and the flood risk extends to properties in the centre of the village.	The Applicant directs the respondent to the response to SPC-005 in **The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, Parish Meetings [PDA-011]**.
WR-SPC-028	Transport and Access	The Applicant proposes to use local roads for HGVs and AILs in conflict with Norfolk County Council Highways advice. The Parish Council considers this entirely inappropriate. Between Sites 8A and 8B, the proposed route uses a short stretch of Market Lane and crosses a culvert considered unlikely to withstand heavy loads. The route would damage verges, banks, trees and hedges and cause high levels of noise and disruption for Market Lane Farm.	The Applicant notes the concerns raised regarding Market Lane and the culvert located between Sites 8A and 8B. The existing culvert over Shotesham Beck currently accommodates standard vehicles including heavy goods vehicles so no damage to the structure is anticipated from use by construction vehicles. The Applicant also notes that an internal haul route is proposed within Site 8A, reducing the extent to which construction traffic would need to travel on Market Lane. Consequently, vehicle movements between Sites 8A and 8B would be limited to a more restricted section of Market Lane, between Access 49 serving Site 8A and Access 50 serving Site 8B, where required. The Applicant is aware of the culvert identified within the issues raised and does not consider that it would prevent the proposed construction traffic route between Sites 8A and 8B from being utilised safely. Construction traffic on this route would be

ID	Theme	Comments/Issues Raised	Applicant's Response
			managed in accordance with the **Outline CTMP [REP1-068]**.
WR-SPC-029	EIA Methodology	The Council asks the Inspectors to consider whether the relatively small contribution from Sites 8A and 8B is sufficient to offset the multiple harms, and what additional mitigation is required to reduce impacts on flooding, water quality and nearby residential dwellings during construction, operation and decommissioning.	See the Applicant's responses to WR-SPC-002 and WR-SPC-028. The Applicant notes the Council's request. It is a matter for the Examining Authority to determine the weight to be attributed to the matters raised in making its recommendation. The Applicant has set out its assessment of the relevant effects and proposed mitigation within the application and Examination documents.
WR-SPC-030	Transport and Access	The Council asks the Inspectors to give full weight to concerns raised by Norfolk County Council Highways, including the unnecessary use of local roads.	The Applicant notes the comments regarding the views expressed by Norfolk County Council in relation to the Scheme and the use of local roads. The Applicant continues to engage with Norfolk County Council throughout the Examination process on transport and highway matters. The suitability of the proposed construction traffic routes, including vehicle type restrictions, vehicle tracking assessments and construction traffic management measures, has informed the development of the construction traffic strategy and is assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPC-031	Examination process	The Parish Council asks the Inspectors to accept appropriate requests for accompanied site visits in the village.	The Applicant notes the Parish Council's request. It is a matter for the Examining Authority to determine the locations it considers appropriate to visit as part of the Accompanied Site Inspection. The Applicant has provided the **Applicant's Draft Itinerary for the Accompanied Site Inspection [REP1-082]** for the Examining Authority's consideration. An updated version of this document has been provided at Deadline 2.
WR-SPC-032	Construction and Decommissioning	The Council requests that any approved development cannot be considered previously developed land under the DCO and that the Applicant establishes a sinking fund to secure adequate funds for land reinstatement at the end of the site's useful life.	The Applicant confirms that land used for solar development would not be considered brownfield land following decommissioning. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land reinstated, with soils restored, in accordance with the **Outline DEMP [REP1-063].** Decommissioning is secured through Requirement 21 of the **Draft DCO [REP1-015]**, under which a detailed DEMP must be submitted to and approved by the relevant planning authority prior to commencement of decommissioning.
WR-SPC-033	Consultation and Engagement The Applicant	The Council considers the lack of trust comes directly from the poor quality of information provided by East Pye, lack of transparency and failure to provide the detailed information planners and residents can reasonably expect. It asks	The Applicant notes the Parish Council's comments regarding the information provided and transparency of the Scheme. The Applicant considers that sufficient information has been provided to enable the likely significant effects of

ID	Theme	Comments/Issues Raised	Applicant's Response
		for any DCO to be robust enough to limit future flexibility.	the Scheme to be assessed and the Application to be examined. The Applicant further notes the request regarding future flexibility. The parameters within which the detailed design of the Scheme must be developed are secured through the **Design Principles, Parameters and Commitments [REP1-078]** and the **Draft Development Consent Order [REP1-015]**. These parameters form the basis of the assessment in the Environmental Statement and ensure that the detailed design remains within the assessed envelope.
WR-SHPC-034	Consultation and Engagement - Community Liaison Group	The Applicant has summarised comments submitted by Shotesham Parish Council regarding the establishment of a Community Liaison Group. This includes the following: Shotesham Parish Council requests automatic membership of the Community Liaison Group (CLG) should consent be granted, on the basis that the parish is directly affected by the scheme. It considers that all affected parish councils should have membership rights and that the CLG should be independently chaired.	The Applicant refers to its response to Q1.1.2 in the **Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]**, which addresses the establishment, membership and operation of the Community Liaison Group.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The Council also seeks assurance that the CLG is structured to effectively engage communities across the full geographic extent of the project, including consideration of multiple liaison groups where appropriate. In addition, it requests that affected parish councils are consulted on the draft Terms of Reference before these are submitted for approval under Requirement 4 of the draft DCO.	

2.11 Tivetshall Parish Council

Table 2.11 Applicant's response to Tivetshall Parish Council [REP1-157], [REP1-248], [REP1-294] and [REP1-474]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-001	Site Selection, Alternatives and Design Evolution	Tivetshall Parish Council objects to the inclusion of Land Parcel 2, comprising Sub-Sites 2A, 2B and 2C, together with the adjoining BESS, Project Substation and associated infrastructure cluster, because the Applicant's own submitted documents identify a concentration of sensitive environmental, community and safety receptors in this locality. The issue is not that the Applicant has undertaken no assessment. The concern is that, for this particularly constrained part of the Scheme, important conclusions of "not significant" depend upon assumptions concerning final layout, panel type and orientation, existing and proposed screening, later detailed design, outline management plans and mitigation which has yet to be demonstrated at the individual parcel and receptor level.	The likely effects of the Scheme during the construction, operation and decommissioning phases are assessed in the **ES [APP-036 to APP 195]**, including in relation to Sub-Sites 2A, 2B and Sub-Site 2C, together with the BESS and Project Substation within the BESS Site. The spatial extent of the Scheme is shown on the **Works Plan [REP1-005 to REP1-006]** and a description of the Works Plan in Schedule 1 of the **Draft DCO [REP1-014]**. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that

ID	Theme	Comments/Issues Raised	Applicant's Response
			are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered. The purpose of the DCO is to facilitate the delivery of the scheme, including the approval of the relevant plans at discharge stage, subject to appropriate approvals once detailed design is known. The drafting of the DCO ensures that final plans "must be implemented as approved". This secures legal compliance. The plans themselves will also include monitoring and mitigation provisions. The approach taken aligns with the consenting approach of all other solar DCOs to date known to the Applicant. The framework for managing environmental effects of the Scheme during the construction, operation and decommissioning phases are secured through various outline management plans **[REP1-058 to REP1-070].** The management plans will ensure that impacts are kept to a minimum. The detailed management plans, which will be substantially in accordance with the outline management plans, will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**. The approval of the detailed

ID	Theme	Comments/Issues Raised	Applicant's Response
			management plans is secured by the Requirements in the **Draft DCO [REP1-014]**.
WR-TPC-002	EIA Methodology	Tivetshall Parish Council believes the Applicant places too much development across widely sensitive rural land, with many significant and long-lasting environmental consequences. Some infrastructure would be permanent, while other impacts depend upon mitigation, future detailed design and post-consent controls whose effectiveness cannot yet be fully demonstrated. Tivetshall Parish Council therefore respectfully requests the ExA recommends that development consent for the Applicant's East Pye Solar Scheme be refused.	The Applicant notes this comment.
WR-TPC-003	Scheme Description EIA Methodology	A recurring concern is that significant elements of the final development remain subject to later detailed design. These include aspects of the BESS technology and layout, battery arrangements, Project Substation technology, equipment locations, drainage and firewater containment, noise mitigation, landscaping, panel	The Applicant refers to its response to WR-TPC-001 in relation to detailed design.

ID	Theme	Comments/Issues Raised	Applicant's Response
		configuration and detailed access arrangements.	
WR-TPC-004	Scheme Description EIA Methodology	Where environmental conclusions depend upon particular layouts, equipment, screening, buffers or operational characteristics, the Applicant should demonstrate that the assessed worst case genuinely encompasses what may ultimately be constructed and that necessary limitations are enforceably secured.	The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered.
WR-TPC-005	Scheme Description EIA Methodology Legal	The relationship between the defined "BESS Site", Sub-Site 1B and Work No. 2 should be definitively reconciled, including the correct parish location and confirmation that the same development boundary has been used consistently throughout the Environmental Statement, Works Plans, Land Plans and draft DCO. Residents should be able to understand, from a single plan and schedule, the precise purpose of each part of the Order Limits around the subsite.	The Applicant refers to its response to WR-TPC-001 in relation to the design and assessment of the Scheme. The Order Limits for the Scheme are shown on the **Location Plan [REP1-004]** and the **Works Plans [REP1-005]**. The Works Plans were resubmitted at Deadline 1 in a revised format intended to provide clearer and more accessible presentation. The Environmental Statement has assessed the Order Limits, defined as the maximum extent of land anticipated to be acquired and/or used for the construction, operation and maintenance, and decommissioning phases of the Scheme, as set

ID	Theme	Comments/Issues Raised	Applicant's Response
			out within **ES Volume 1, Chapter 3 – The Order Limits [APP-038]**
WR-TPC-006	Site Selection, Alternatives and Design Evolution	The Applicant explains the importance of proximity to the Bramford–Norwich 400kV network and Point of Connection, access and land availability. However, the Parish Council considers that this does not itself demonstrate that the BESS, Project Substations or Sites 2A and 2B represent the least environmentally harmful practicable locations.	**ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** and the **Design Approach Document [APP-212]** set out the relevant initial considerations in the siting of the Project BESS and 400kV Project Substations and the reasonable alternatives considered through the iterative design evolution relevant to these components. Explanation of the siting considerations for the BESS is set out within Section 3.7 **Site Selection Assessment [APP-215]**, and the iterative design of mitigation and setbacks set out within **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** and the **Design Approach Document [APP-212].** Sub-Sites 2A and 2B are considered to be suitable for inclusion within the Scheme against the environmental, planning, technical, and land factors set out within the **Site Selection Assessment [APP-215]** in line with Section 2.3 and 2.10 of NPS EN-3 which sets out the factors influencing site selection. Paragraph 4.3.24 of NPS EN-1 states that the Secretary of State should not refuse an application for development on one site simply because fewer

ID	Theme	Comments/Issues Raised	Applicant's Response
			adverse impacts would result from developing similar infrastructure on another suitable site and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.
WR-TPC-007	Site Selection, Alternatives and Design Evolution	The Applicant should provide a transparent parcel-specific account of the alternatives considered, the constraints applied, mitigation introduced after site selection, alternatives rejected and the environmental consequences remaining after mitigation.	The main reasonable alternatives considered by the Applicant are set out within the **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** and **Site Selection Assessment [APP-215].**
WR-TPC-008	Site Selection, Alternatives and Design Evolution	Tivetshall Parish Council does not dispute the national need for renewable energy infrastructure. The objection is about the adequacy of the Applicant's justification for placing this scale of infrastructure in this specific rural location.	The Applicant welcomes that the Parish Council does not dispute the national need for renewable energy infrastructure. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The **Statement of Need [APP-206]** confirms that the need for the Scheme is urgent and that substantial weight should be

ID	Theme	Comments/Issues Raised	Applicant's Response
			given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. Paragraph 4.3.9 of NPS EN-1 confirms that the national policy does not impose any obligation "to establish whether the proposed project represents the best option from a policy perspective". The Applicant must demonstrate compliance with the national policy against each of the considerations set out within that policy. Section 2.3 of NPS EN-3 sets out the factors influencing site selection and design, and Section 2.10 sets out, at paragraphs 2.10.10 – 2.10.64, the factors that are likely to influence the key considerations involved in the siting of a solar farm. These include irradiance and site topography, availability of grid connection, proximity of a site to dwellings, agriculture land classification and land type, accessibility, and capacity of a site. The Applicant's approach to selecting suitable Sites against each of these factors is set out in the **Site Selection Assessment [APP-215]**.
WR-TPC-009	Aviation (Tibenham)	Land Parcel 2 and the BESS both lie within Tibenham Airfield safeguarding and EFATO zones. The airfield operator has explicitly stated that development within these parcels poses an existential threat to glider safety.	The Applicant continues to engage with Norfolk Gliding Club, who operate from Tibenham Airfield, regarding the impact upon their safeguarding concerns. The comments and issues raised by WR-TVPC-009 were discussed at a meeting with Norfolk Gliding Club on 14/10/26. An updated SoCG will be submitted at Deadline 3 to provide an

ID	Theme	Comments/Issues Raised	Applicant's Response
		Where aviation safety depends upon particular areas remaining free from panels or upon particular panel configurations, those limitations should be secured in the DCO rather than left to later detailed design. If aviation safety cannot be satisfactorily demonstrated, the affected solar areas should be removed or materially redesigned.	update on matters under discussion and engagement.
WR-TPC-010	BESS Safety	The Applicant's own Battery Safety Management material recognises hazards including thermal runaway, fire, explosion, toxic-gas release, reignition and contaminated firefighting water. The Parish Council's concern is that important safety-critical matters remain dependent upon final technology selection and later detailed plans. The Applicant should demonstrate that the final BESS configuration remains within the assessed safety envelope and should secure appropriate separation, emergency access, firefighting-water provision, firewater containment, drainage isolation, incident response and post-incident remediation.	The Applicant's **Outline BSMP [REP1-066]** was prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). 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. As stipulated in the **Outline BSMP [REP1-066]**, 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), local

ID	Theme	Comments/Issues Raised	Applicant's Response
		The issue is more serious because the BESS safety case depends on reliable communication systems. The Applicant states that the BESS will rely on 24/7 remote monitoring, a control facility able to shut the system down, emergency-service liaison and a future Emergency Response Plan.	BESS manual E-Stop facilities will be provided once the BESS system is selected at the detailed design stage. The onsite control facility, FCP facilities, and manual E-Stop allows the BESS operations tam and firefighters to monitor and shut down battery systems (if required). The 24/7 remote control facility is required by both NFCC guidance and NFPA 855 (2026) safety standards. As outlined in the oBSMP the 24/7 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 with which BESS systems must comply as best practice. As required by NFCC guidance and NFRS requirements 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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 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 **Outline BSMP [REP1-066]**.
WR-TPC-011	BESS Safety	A BESS fire is low probability but high consequence, and the ExA should require the Applicant to provide clear evidence on toxic gas release, plume behaviour, emergency access, firewater containment and downwind receptor exposure. Tivetshall residents need to know what would happen if a BESS fire or thermal runaway incident occurred. The submission does not appear to provide a clear, localised assessment of toxic smoke, plume movement, downwind exposure or emergency arrangements for farms, homes or the railway corridor	The Applicant's **Outline BSMP [REP1-066]** was prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). NFRS is expressly named as a consultee for the discharge of Requirement 6 of the **Draft DCO [REP1-014],** 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. The **Outline BSMP [REP1-066]** very clearly documents the fire and explosion protection

ID	Theme	Comments/Issues Raised	Applicant's Response
		in Tivetshall, Great Moulton, Wacton and neighbouring villages.	requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage. As stated in Executive Summary of the **Outline BSMP [REP1-066]**, the illustrative 5MWh BESS design comprising 12 battery racks was selected as being representative of a high energy density Lithium Iron Phosphate (LFP) BESS system (which is currently commercially available). LFP is currently the dominant BESS chemistry and as defined in the **Outline BSMP [REP1-066]** (Executive Summary) this provides reasonable worst-case data to assess explosion risks and toxic gas emissions. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the **Outline BSMP [REP1-066]** Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions

ID	Theme	Comments/Issues Raised	Applicant's Response
			recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the "*proposed development should not result in any significant adverse impact on public health*." The Plume Study in Appendix B of the **Outline BSMP [REP1-066]**assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive receptors within a 1km radius of the BESS Site. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGLs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). 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 of the **Outline BSMP [REP1-066]** concludes that there will not be adverse effects at the closest residential receptor locations because of a BESS fire incident. As the air quality impacts associated with the detailed design Plume Study are not expected to

ID	Theme	Comments/Issues Raised	Applicant's Response
			be greater than those predicted at the outline stage using the worst-case assumptions outlined above, it can be concluded that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled. Final comprehensive risk assessment reports, modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. As the BESS design and system chemistry type for the Scheme is not yet finalised, the Applicant has committed to commissioning an additional Plume Study at the detailed design stage as stipulated in Section 4.5.13 of the **Outline BSMP [REP1-066]** which will be secured through the DCO: "*at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP*

ID	Theme	Comments/Issues Raised	Applicant's Response
			produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." The **Outline BSMP [REP1-066]** Section 4.5 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 oBSMP 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. 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 was submitted at Deadline 1 and is ongoing.
WR-TPC-012	Water Environment	The Applicant should provide a coordinated field-level understanding of drainage pathways, ponds, ditches, watercourses, cable crossings, access	The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation. The results

ID	Theme	Comments/Issues Raised	Applicant's Response
	Ground Conditions	tracks, flood-risk areas and relevant groundwater or private-water receptors.	of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]** "*As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post consent*". The ground investigation will be designed to provide information on the geology, hydrological regime, groundwater and surface water quality. Watercourses, topography and overland flow routes are shown on **Figure 9.2 in Appendix A of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**. Avoidance Areas have been identified for main rivers which commit to trenchless crossings as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The sequential approach has been applied as far as practicable to locate all built infrastructure outside of Flood Zones 2 and 3, and outside of areas of 'low' to 'high' surface water flood risk as far as possible. Limited areas of Solar PV Arrays are located within surface water flood risk areas,

ID	Theme	Comments/Issues Raised	Applicant's Response
			however the Arrays are raised on narrow supports at an appropriate freeboard above the ground/anticipated flood depths and as such will not have a significant impact on floodplain storage or flood flow routes. This mitigation is secured within the **Design Principles, Parameters and Commitments [REP1-078]**. Water receptors (including groundwater) have been identified and assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. With the incorporation of embedded mitigation measures, the assessment identifies the impact as 'Not Significant', with the exception of the cessation of agricultural/fertiliser use which is assessed as 'Significant Major Beneficial'.
WR-TPC-013	Water Environment	Climate-change allowances, extreme rainfall, soil compaction, runoff, groundwater recharge and containment of contaminated firewater should be considered together.	The management of firewater within the BESS facility is outlined within the **Outline BSMP [REP1-066]**. The impacts of the Scheme on groundwater recharge have been assessed for all phases within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The assessment concludes that the potential effects are Not Significant. Climate change has been appropriately considered within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**

ID	Theme	Comments/Issues Raised	Applicant's Response
			through the use of Environment Agency modelled outputs which include climate change for surface water and fluvial flood risk. The outline surface water drainage arrangements also utilise the upper end +45% allowance for peak rainfall intensity for the sizing of surface water attenuation.
WR-TPC-014	Water Environment Ground Conditions	The Scheme should demonstrate the effects at the individual field and receptor level, particularly where panel runoff, soil compaction, access tracks, cable trenches, ditch crossings, construction compounds and final drainage arrangements interact.	The Applicant refers to its response to WR-TPC-012. Construction compounds will incorporate appropriate surface water management as set out and secured within the **Outline CEMP [REP1-058]** and the **Outline DEMP [REP1-062]**. Detailed surface water drainage design is secured by Requirement 11 in the **Draft DCO [REP1-014]**.
WR-TPC-015	Water Environment Ground Conditions	Tivetshall Parish Council requests the ExA requires the Applicant to provide a receptor-specific private and public water-supply risk assessment before consent is granted. This should include verified private-supply locations, abstraction depths, baseline water-quality testing, groundwater-flow assessment, contaminant-pathway analysis, piling and foundation risk assessment and firewater containment design.	**ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]** presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater, including groundwater as a resource. The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The abstractions (including Private Water Supplies) within the Study Area are presented in tables 3.10

ID	Theme	Comments/Issues Raised	Applicant's Response
			and 3.11 of the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]**. The Conceptual Site Model presented in **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]** will be refined through ground investigation. The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]** "*As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post consent*". The **Outline CEMP [REP1-058]** requires that a Foundation Works Risk Assessment (FWRA) is prepared for the BESS, National Grid Substation and any other structures requiring deep foundations and/or piling such as the 132kV and 400kV Substations, informed by the post-consent ground investigation. The **Outline CEMP [REP1-058]** also requires that the Applicant undertake

ID	Theme	Comments/Issues Raised	Applicant's Response
			Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors. The proposals for containment of firewater at the BESS are set out in the **Outline BSMP [REP1-066]**.
WR-TPC-016	Utilities	B4RN community fibre-optic broadband infrastructure runs through Land Parcel 2 and along the verges of Station Road, which is essential for construction access. Indicative utility mapping cannot by itself establish the exact depth and position of every local fibre cable or demonstrate how it would be protected during excavation, widening, abnormal-load movements and other construction activity. Tivetshall Parish Council asks for a B4RN-specific asset protection and liaison procedure, including verification of precise cable positions before intrusive works, appropriate trial-hole or detection procedures, agreed crossing/protection methods, provider notification, emergency repair	The Applicant refers to its response to Morningthorpe and Fritton Parish Council under WR-MFPC-022 in this document regarding utilities.

ID	Theme	Comments/Issues Raised	Applicant's Response
		arrangements and responsibility for any interruption.	
WR-TPC-017	Ecology and Biodiversity	It is unclear whether the Site 2 ecological baseline is complete, seasonally robust and sufficiently precautionary to support the conclusion that there would be no significant ecological effects. The Applicant should provide a clear parcel-specific ecological schedule identifying survey coverage, results, habitat losses, mitigation, licensing requirements and residual effects, together with a transparent BNG position for the BESS and associated hard infrastructure. Land Parcel 2 includes live Countryside Stewardship agreements targeted at lapwing habitat and supporting skylark and turtle dove populations. These schemes are publicly funded to create and maintain functional breeding habitat.	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in **ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]**, with Appendix 8.4 relating to breeding bird surveys. Turtle dove and grey partridge were recorded during breeding bird surveys, but not as a suspected breeder. Lapwing was also recorded, but not as a confirmed breeding species. The only confirmed open ground nesting species recorded was skylark. As a result, a skylark mitigation strategy is detailed in **Outline LEMP [REP1-064]**. An assessment of potential effects of the Scheme on ground nesting farmland birds during construction, operation, and decommissioning is set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-018	Ecology and Biodiversity	Tivetshall Parish Council asks that the ExA requests the Applicant demonstrate, parcel by parcel, what existing farmland-bird habitat would be displaced, what stewardship commitments would be affected and where effective replacement habitat would be provided throughout the operational period. Given the number of ponds, ditches, hedgerows and connected habitats within Site 2 and the BESS site, Tivetshall Parish Council requests a clear parcel-specific GCN plan showing surveyed ponds, terrestrial habitat, connectivity, buffers, proposed works and any licensing or mitigation requirements. Land Parcel 2 lies within a Core Sustenance Zone for barbastelle bats, linking it functionally to confirmed and likely maternity colonies within the wider East Pye scheme landscape.	The ES has been prepared to identify and evaluate the likely significant effects of the Scheme on the environment and to identify measures to mitigate or manage any significant negative effects. In turn this will help to ensure decision makers are able to make an informed judgement on the environmental impacts of the Scheme. The ES has been prepared in accordance with relevant guidance as noted in paragraph 2.3.2 of **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]**. The mitigation strategy for great-crested newt set out within **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050]** addresses likely impacts upon GCN. This species has been assessed within **Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** following surveys which are detailed in **ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [REP1-048]**. The Applicant has considered the impacts to GCN as part of the embedded design set out in **Design Principles, Parameters and Commitments [REP1-078]** with 50m buffers being applied to ponds which support GCN and 30m of all other ponds where GCN were absent. For those ponds where surveys were not carried out due to access constraints, a precautionary 50m buffer was applied.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Should it be ascertained that a licence is required then it will be sought from Natural England in accordance with the **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [REP1-050]**. The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) including those within 'Land Parcel 2' within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The Scheme design primarily utilise 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			reduced 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 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. Of particular note, a minimum 15m buffer will be applied to woodland (non-ancient) and a minimum 30m buffer will be applied to all ancient woodland immediately adjacent to the Order Limits, with habitat creation and enhancement within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing lo enhanced supporting habitats surrounding woodland parcels for the benefit of barbastelle bats (if present), thereby contributing towards the species favourable conservation status. A buffer zone of 10m will be delivered between hedgerows and solar PV apparatus; which is double the standard

ID	Theme	Comments/Issues Raised	Applicant's Response
			approach of 5m very commonly adopted in the design of similar developments. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**.
WR-TPC-019	Ecology and Biodiversity	Tivetshall Parish Council submits that the ExA should require the Applicant to demonstrate the avoidance of protected roosts and functional habitat and identify any licensing requirement arising once the final design is known. The cumulative effect of habitat change across Site 2 and the adjoining infrastructure cluster should also be expressly addressed.	The ES has been prepared to identify and evaluate the likely significant effects of the Scheme on the environment including cumulative effects. It also sought to identify measures to mitigate or manage any significant negative effects, including protected species licensing. In turn this will help to ensure decision makers are able to make an informed judgement on the environmental impacts of the Scheme. The ES has been prepared in accordance with relevant guidance as noted in paragraph 2.3.2 of **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]**.
WR-TPC-020	Landscape and Visual Lighting	The Applicant's own landscape material identifies Site 2 as part of an open rural landscape with expansive skies and a PRoW network of substantial recreational value. Sub-Site 2B is also identified as lying within an area of very dark night skies.	The Applicant notes the comment. Sub-Site 2B has been allocated for Solar Panel PV Arrays. Once operational, these will not feature any long-term fixed light sources.
WR-TPC-021	Landscape and Visual	Solar panels, substations, inverters, transformers, fencing, CCTV, access tracks and planting would be	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices assess landscape and visual effects on a range of

ID	Theme	Comments/Issues Raised	Applicant's Response
	Lighting	experienced collectively. Proposed planting may reduce some visibility over time but does not remove the need to assess effects before planting matures and may itself alter historic openness. The issue is not simply whether individual views can eventually be screened. The ExA should examine the combined change to setting, including the effect of solar arrays, inverter and transformer equipment, fencing, CCTV, access tracks, cabling and associated planting. Loss of rural tranquillity, dark skies and lighting effects is identified as a principal unresolved issue for Tivetshall Parish.	receptors within the study area at defined phases including construction, year 1, year 15 and decommissioning. Effects at year 1 represent the change which would occur prior to the proposed mitigation measures establishing. The assessment process is intended to identify and explain the significance of effects on those receptors through professional judgement, at each phase. The potential effects associated with operational lighting have been considered through the development of the **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151].** Whilst lighting will be present, its operation will be limited to periods when the Sites are occupied. The selection, positioning, orientation and control of luminaires will take account of surrounding receptors and the wider night-time environment, with measures incorporated to minimise potential lighting effects. Given the limited and controlled nature of the proposed operational lighting, together with the measures established in the Lighting Strategy, significant residual lighting effects are not anticipated.
WR-TPC-022	Cultural Heritage	The Applicant should demonstrate the effect upon the settings of nearby listed	The Applicant notes that an assessment of effects upon cultural heritage assets has been provided

ID	Theme	Comments/Issues Raised	Applicant's Response
		buildings, Grade I churches, Wacton Conservation Area and the historic pattern of lanes, field boundaries and routeways. Land Parcels 2A, 2B and 2C lie within the setting of Wacton Conservation Area and Tivetshall's Adopted Neighbourhood Plan, whose appraisal identifies special interest as deriving from openness, long uninterrupted views, historic landscape legibility and the absence of intrusive modern infrastructure. The land surrounding Tivetshall preserves the footprint of a medieval landscape that has remained largely unchanged for hundreds, if not thousands, of years. The ancient field patterns, routeways and topographical lines still mirror the layout of the village and its immediate neighbouring parishes.	within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. These assessments noted that assessment of Wacton Conservation Area was not taken forwards for further assessment as it was considered that there would be no impact to this assets character and appearance by the Scheme. Regarding the Council's comments regarding landscape, the Applicant refers to its response provided in Tivetshall Parish Council's relevant representation [RR-1951] in **The Applicant's Response to Relevant Representation Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]** under comment ID TPC-009 and TPC-012. The Zone of Theoretical Visibility (ZTV) presented in **ES Volume 2, Figure 7.5.10 -Site 1 Zone of Theoretical Visibility [REP1-039]** shows there is limited visibility of the solar panels and substation in Site 1 and solar panels in Site 2 as identified in **ES Volume 2, Figure 7.5.9 - Site 2 Zone of Theoretical Visibility [REP1-038]** from Wacton Conservation Area. Typically this visibility is limited to Wacton Common, however Site survey has identified that intervening hedgerows and tree

ID	Theme	Comments/Issues Raised	Applicant's Response
			features on field boundaries provide further filtering of views from that shown on the ZTV. The Applicant refers to its response to WR-TPC-042 in relation to visibility from Tivetshall.
WR-TPC-023	Public Rights of Way	Multiple public rights of way cross and border Land Parcel 2, and border the BESS and project substation sites, forming part of the way the conservation area and open countryside are experienced. Routes presently experienced through open agricultural countryside would be bordered or crossed by solar panels and their infrastructure, fencing, construction works, cable routes and associated planting. Retaining the legal line of a PRoW does not necessarily retain its rural character, tranquillity, openness or recreational value, including receptor safety.	**ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** has considered the visual amenity effect on the PRoW network considering each route 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 consideration of the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** which includes all components of the Scheme.
WR-TPC-024	Transport and Access	Land Parcel 2 runs directly alongside the A140, a major strategic route. Highways consultees have already raised concerns regarding glint and glare affecting road users.	The Applicant has assessed both fixed and single-axis tracking panels for a 4.2-km section of the A140 in **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025]** to **[AS-029]**. The assessment concludes that screening in the form of existing vegetation, buildings and intervening

ID	Theme	Comments/Issues Raised	Applicant's Response
		The issue is whether a safety conclusion for a 60-year development is sufficiently robust where the assessment depends materially upon existing screening and where both fixed and single-axis tracker panel options remain within the design envelope. Tivetshall Parish Council requests the ExA require the final panel orientation, anti-reflective characteristics, setbacks and any essential screening relied upon for highway safety to be clearly identified and secured for the lifetime of the development, including provision for loss, failure or removal of screening vegetation.	terrain is predicted to significantly obstruct views of reflecting panels. Any potential impacts are further mitigated by the Applicant's implementation of vegetation as part of the landscape plan. A significant impact upon road users of the A140 is not predicted.
WR-TPC-025	Transport and Access	Where widening or straightening of Station Road is required, the effects on pedestrians, cyclists, equestrians, junctions, local properties and connected PRoWs should be expressly assessed.	The Applicant can confirm that the Highway Works proposed for B1134 Station Road would be temporary in nature for the movement of AILs. This includes pruning and trimming of vegetation, temporary removal of street furniture and lowering an earth bank to allow for vehicle oversail on the inside of a bend. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023). The

ID	Theme	Comments/Issues Raised	Applicant's Response
			Applicant therefore considers that the effects of construction traffic on vulnerable road users have been assessed in accordance with recognised industry best practice.
WR-TPC-026	Transport and Access	Tivetshall Parish Council submits the ExA requires the Applicant to provide a specific pedestrian and child safety assessment before any conclusion is reached that the road network can safely accommodate the proposed construction traffic. Before any conclusion is reached on transport acceptability, the Applicant should provide a school bus and local bus impact assessment for Tivetshall, identifying affected routes and stops, child safety at roadside waiting points, construction HGV movements during school bus times and how local bus services would be maintained safely.	The Applicant acknowledges the concerns raised regarding potential effects on child safety, school travel and local bus services. As shown within **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**, construction traffic associated with the BESS and Sites 1C to 1D would access the Site via Station Road. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023). In accordance with this methodology, the presence of vulnerable road users, including educational facilities where located on the assessed highway network, was considered when determining the sensitivity of highway links and assessing the significance of effects. A detailed CTMP is secured through Requirement 15 of the Draft DCO [REP1-014] and must be approved by the relevant planning authority following consultation with the relevant highway

ID	Theme	Comments/Issues Raised	Applicant's Response
			authority, including Norfolk County Council in its role as Local Highway Authority. The Applicant therefore considers that the effects of construction traffic on vulnerable road users have been assessed in accordance with recognised industry best practice.
WR-TPC-027	Noise and Vibration	The proposed National Grid Substation, 400kV Project Substation and BESS would introduce a new and persistent industrial acoustic character into an exceptionally quiet rural environment.	The Applicant acknowledges that the National Grid Substation, 400 kV Project Substation and BESS would introduce new operational sound sources into the rural environment. However, the presence of new plant does not necessarily mean that a persistent industrial acoustic character would be created at nearby noise-sensitive receptors. The combined operational noise from this infrastructure has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, taking account of site-specific background sound levels and the more sensitive night-time and early-morning periods. Potential low-frequency noise from the National Grid Substation, Project Substations and BESS was also assessed at the worst-affected residential receptors against the NANR45 criteria in **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
			At receptors NSR2A, NSR2B, NSR3A and NSR3B, which are identified as those most likely to be affected by the BESS: the • overall night-time and early-morning free-field rating level from the Scheme at the receptor façades must not exceed the sound levels set out in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, or 30 dB $L_{Ar,Tr}$, whichever is higher; and • the overall daytime and evening free-field rating level from the Scheme at the receptor façades must not exceed the sound levels set out in the **Evening Noise Assessment [REP1-101]**, or 30 dB $L_{Ar,Tr}$, whichever is higher.
WR-TPC-028	Noise and Vibration	Tivetshall Parish Council asks the ExA to require a receptor-by-receptor assessment for nearby homes, rural businesses, listed buildings and sensitive community locations, and a cumulative assessment covering the BESS, substations, inverters, transformers, cable works, construction	The Applicant confirms that a receptor-by-receptor assessment has been undertaken. The assessment presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, supported by **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**, identifies the relevant noise- and vibration-sensitive receptors and reports the predicted effects at those receptors.

ID	Theme	Comments/Issues Raised	Applicant's Response
		compounds, traffic routes and decommissioning.	The receptors assessed include nearby residential properties and other identified sensitive uses. Rural businesses and community locations have been included where the nature of their use gives rise to sensitivity to noise or vibration. Listed buildings have been considered where they contain a noise-sensitive use or where their fabric could be sensitive to construction vibration. The operational assessment considers the combined contribution from the applicable fixed plant associated with the Scheme, including the BESS, substations, inverters and transformers. It therefore assesses the cumulative operational sound level from relevant plant at each receptor, rather than considering each item of plant only in isolation. The assessment uses site-specific baseline monitoring, including night-time background sound levels, and applies BS 4142:2014+A1:2019, including consideration of tonal and low-frequency characteristics. Following mitigation secured through the **Outline OEMP [REP1-060]**, no significant residual adverse operational noise effects are predicted. Construction noise and vibration have also been assessed at relevant receptors. The assessment encompasses the principal construction activities, construction compounds, cable-route works, HDD activities and construction traffic. Cable excavation,

ID	Theme	Comments/Issues Raised	Applicant's Response
			installation and jointing are progressive and temporary activities, while the detailed calculations focus on activities with the greatest potential to produce significant effects, including HDD works that may remain at a fixed location for a longer period. Construction controls are secured through the **Outline CEMP [REP1-058]** and the **Outline CTMP [REP1-068].** Decommissioning noise has similarly been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, with the applicable controls secured through the **Outline DEMP [REP1-062]**.
WR-TPC-029	Air Quality	In a quiet rural place, even modest increases in dust, diesel fumes, particulates and construction disturbance are noticeable. The concern is the combined impact of industrial-scale works imposed on a non-industrial landscape. The Applicant's Environmental Statement does not give residents a clear enough account of the effects from the solar arrays on Land Sites 2A, 2B and 2C, BESS, substations, cable works, compounds, HGV traffic, Station	**ES Volume 1, Chapter 13 – Air Quality [APP-049]** assesses the potential likely air quality effects of the Scheme in accordance with the methodology agreed through EIA Scoping and consultation. In addition, **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]** presents the assessment of fugitive dust emissions during construction, operation and decommissioning phases. The assessments presented in **ES Volume 1, Chapter 13 – Air Quality [APP-049]** and **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]** have been undertaken in accordance with best practice guidance and consider baseline

ID	Theme	Comments/Issues Raised	Applicant's Response
		Road activity, construction and decommissioning. Air-quality impacts must be assessed cumulatively. The BESS, National Grid substation, 400kV infrastructure, project substations, solar arrays, cable routes, access tracks, compounds, HGV routes and decommissioning works cannot be treated as separate minor impacts if the same residents experience them together.	conditions, such as baseline levels of air pollutants, at the Site and in the surrounding area. Road traffic emission impacts have been considered by assessing changes in traffic flows on roads in the study area which includes Station Road (Link '17' in **Table 13.11 of ES Volume 1, Chapter 13 – Air Quality [APP-049]**). Furthermore, a worst-case assessment has been carried out assuming that activities occur across all sites simultaneously for both road traffic emission impacts presented in **ES Volume 1, Chapter 13 – Air Quality [APP-049]** and fugitive dust emission impacts (including dust deposition, ecological and particulate matter human health impacts) presented in **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]**. Therefore, the assessment considers the cumulative air quality impacts of the proposed works.
WR-TPC-030	Soils and Agriculture	The development affects productive agricultural land, including Best and Most Versatile land. The Applicant should distinguish temporary solar occupation from permanent or potentially irreversible effects associated with substations, BESS foundations,	The loss of BMV land across the scheme is 28.9ha. land not subject to permeant works will be returned to agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many

ID	Theme	Comments/Issues Raised	Applicant's Response
		hardstanding, piling, access tracks and drainage alteration. Best and Most Versatile Agricultural Land and loss of food-producing land is identified as a principal unresolved issue for Tivetshall Parish.	considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** assesses both permanent and temporary land occupation of the Scheme and a breakdown of areas disturbed is provided in Table 15.14 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. In terms of food production, yield and economic benefits can be illustrated using recognised agricultural budgeting books. ES Chapter 15 has used Nix Farm Management Pocketbook 56th Edition (2025), since the time of writing the 57th edition has been published. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. Furthermore, there are no policies or requirements for land to be farmed for food production or at any

ID	Theme	Comments/Issues Raised	Applicant's Response
			particular level of intensity, irrespective of ALC grade. The area of agricultural land in Norfolk is about 417,633ha. The total Order Limits for the Scheme is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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.
WR-TPC-031	Climate Change	Climate assessment should address not merely the general benefits of renewable generation but the resilience of the infrastructure itself to extreme rainfall, heat, drought, fire and changing groundwater and drainage conditions.	The Climate Change chapter includes a Climate Resilience Assessment which considers future risks from increased temperatures, extreme rainfall, flooding, storms and wildfire. Table 6.36, Table 6.37 and Table 6.38 in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** detail how the scheme has been designed to remain resilient against future climate conditions and no residual significant climate-related risks have been identified.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TVPC-032	Need for the Scheme	A general renewable-energy benefit should not obscure local environmental harm or the absence of detailed BESS-specific lifecycle assessment.	The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. In terms of the planning balance, and as set out in the **Planning Statement [REP1-074]**, with the critical and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse effects identified, including impacts to agricultural land, are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.
WR-TPC-033	Electromagnetic Fields	The Applicant's electromagnetic fields assessment remains high-level and desk-based. It does not provide clear receptor-by-receptor mapping for homes, PRoW, children's routes, ecological corridors, substations, BESS infrastructure or cable corridors.	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (**ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**) to determine the impacts upon human health. The Applicant therefore considers the data robust and reliable. Levels of EMF associated with the Scheme are known, as the voltages used by the infrastructure are designed to specifically comply with the

ID	Theme	Comments/Issues Raised	Applicant's Response
			infrastructure being used and therefore does not vary. The assessment has compared the distances between human-health receptors in the existing environment (such as residential dwellings) and electrical infrastructure as part of the Scheme, as opposed to identifying single receptors. The typical electromagnetic fields for infrastructure associated with the Scheme are shown to be within and below the acceptable exposure limits of 100 micro-Tesla (μT) for magnetic fields and 5 (kilo-Volts per metre) kVm^{-1} for electric fields, considering the distance between the electrical infrastructure and human health receptors (i.e. residential dwellings).
WR-TPC-034	Socio-Economics	Tivetshall tourism depends on the rural environment: quiet countryside, dark skies and a sense of tranquillity, all of which would be disrupted by construction traffic, lighting and industrial activity around the BESS site, project substation, solar arrays and their infrastructure. The assessment of local business and employment impacts is inadequate. It relies on regional averages and generic	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** includes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects.

ID	Theme	Comments/Issues Raised	Applicant's Response
		data rather than identifying the specific businesses, farms and self-employed residents operating near the BESS site, cable corridors or solar arrays.	There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be compensated either by agreement or in accordance with the compensation code. The Applicant considers that the nature of the assessment is therefore adequate and proportionate.
WR-TPC-035	Socio-Economics	The assessment does not address the impact on agricultural contractors or seasonal workers who depend on uninterrupted access to farmland. The BESS site, project substation, solar arrays, associated infrastructure and cable routes may restrict field access, increase travel times and interfere with soil management and drainage.	Impacts upon the farm businesses within the Order Limits (OL) excluding the CRC have been considered within **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. Contract farming agreements are subject to change as farm businesses operate. None of the farm businesses within the OL excluding the CRC will cease to operate due to the Scheme, it is likely that those farms with contract farming agreements will keep them in place, albeit potentially on a smaller area of land. the Applicant does not propose to permanently restrict access to agricultural land as a result of the Scheme. Construction activities would be managed in accordance with the **Outline CTMP [REP1-068]**, and where temporary changes to access arrangements are required, appropriate management measures and advance notification

ID	Theme	Comments/Issues Raised	Applicant's Response
			would be implemented to maintain access and minimise disruption to landowners, agricultural contractors and seasonal workers.
WR-TPC-036	Socio-Economics	The wider economic benefits of a nationally significant energy scheme do not remove the need to understand the burden placed on local residents and villages.	The Applicant notes this comment.
WR-TPC-037	Consultation and Engagement	The Applicant has digitally excluded a significant number of Tivetshall parishioners from being able to see the proposals relating to their village. Not all households have the ability to use the internet. Updated plans and published documents appear inconsistent. Tivetshall Parish Council asks the ExA to request a clean amendment / reconciliation schedule regarding the parish location issues.	The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. USB memory sticks with the full suite of Application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library. Further details have been published on the Applicant's website. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were

ID	Theme	Comments/Issues Raised	Applicant's Response
			available to be sent directly to individuals upon request.
WR-TPC-038	Cumulative Effects, In-Combination Impacts	Residents will not experience the development as separate technical chapters. Site 2, the BESS, Project Substations, National Grid infrastructure, cable corridors, highway works, traffic, noise, lighting, drainage changes and ecological effects will be experienced together within the same rural landscape. Tivetshall Parish Council asks the Examining Authority to require a genuinely integrated assessment of the western infrastructure cluster affecting Tivetshall, Great Moulton and Wacton. The application does not yet provide a sufficiently transparent local receptor-area assessment showing what it will mean when the solar arrays, BESS, Project Substations, National Grid infrastructure, cabling, access works, traffic, noise, lighting, drainage and ecological change are experienced together by the same communities and landscape.	The Applicant refers to its response on in-combination effects under comments BEPS-034, BEPS-126, and BEPS-569 in **The Applicant's Response to Relevant Representations - Part 3 [PDA-010].**

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-039	Need for the Scheme Site Selection, Alternatives and Design Evolution	Tivetshall Parish Council acknowledges there is a need to protect the planet from climate change and supported a 50MW solar site application in 2025. Studying the East Pye project DCO gives the Parish Council grave concerns on viability, mostly due to inaccuracies and a lack of detail on significant issues. The Parish Council believes any project should be planning led in line with EN-3. This project appears landowner-led.	The Applicant welcomes the Council's acknowledgement that there is a need to protect the planet from climate change. In relation to site selection, the Applicant refers to its response to WR-TPC-008 above. The Applicant refers to the response to TPC-005 within the **Applicant Response to Relevant Representations Part 4 [PDA-011]** regarding the approach to the Scheme.
WR-TPC-040	Cumulative Effects, In-Combination Impacts Transport and Access	The solar, cable corridors, BESS and 400kV Project Substation should not be assessed in isolation. The assessment should not treat Site 2A, 2B and 2C construction traffic, BESS construction traffic, substation traffic, cable-route traffic and access-track works as isolated impacts. Local roads will experience the combined effect.	The Applicant acknowledges the concerns raised regarding the combined effects of construction activities associated with different elements of the Proposed Scheme. The Applicant agrees that the effects of construction traffic should be considered on a combined basis. For this reason, 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. Accordingly, traffic associated with the BESS, solar arrays, cable route, Project Substation and associated infrastructure has already been considered together within the transport assessment.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant also notes that Figure 2.1 of the **Outline CTMP [REP1-068]** demonstrates that construction activities are phased and staggered throughout the construction programme. As such, in practice, many of these activities would not occur concurrently and traffic levels experienced during construction are expected to be lower than those assessed within the Environmental Statement.
WR-TPC-041	Soils and Agriculture	The Applicant has failed to justify the use of Best and Most Versatile agricultural land.	Under the new Predictive ALC Map for England, approximately 94% of Norfolk's agricultural land is BMV, so the Order Limits are not unusually high in BMV. The **Site Selection Assessment [APP-215]** was undertaken proportionately and in accordance with national planning policy. As set out in the Site Selection Assessment, for the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the search area (not using the new predictive ALC mapping as this was not available at the time). Paragraph 2.10.21 of NPS EN-3 states: '*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been*

ID	Theme	Comments/Issues Raised	Applicant's Response
			shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible. Accordingly, the presence of BMV land does not preclude solar development at Stage 2 or thereafter.
WR-TPC-042	Landscape and Visual	Tivetshall residents and visitors value the tranquillity and special qualities of the Great Moulton Plateau Farmland and Waveney Tributary Farmland, the richness and intrinsic value of living within the countryside and amongst its natural fauna and flora. The Parish Council is very concerned that the Landscape assessment recognises major/significant impact of the National Grid and 400kV substations but understates the impact. The result will be permanent loss of food-producing agricultural fields and the landscape. Views of the parish boundary historic Hundred Way with its ancient trees and hedging will be lost. Instead the view will be substations, fencing, access routes, CCTV, lighting and vehicles.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices assess landscape and visual effects on a range of receptors within the study area at defined phases including construction, year 1, year 15 and decommissioning. Specifically with reference to visibility from Tivetshall, the settlement is located ~1.6km to the south of the Scheme, with the closest element being the Project Substation within the BESS Site. As demonstrated by the **ZTV analysis for the BESS Site [REP1-040**] visibility of the Scheme diminishes with distance and from the settlement itself is limited. Wider visibility from the local landscape surrounding is more readily apparent and in worst case experienced by recreational users. However, the Scheme is located to the north and the wider views to the surrounding landscape will be unaffected thus the visual change will be limited in scale.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-043	Lighting	Dark skies will be affected by site lighting. This will cause disturbance or risk to abundant wildlife and a massive change to the views and use of the land from agriculture and leisure access to industrial energy production. There is no detail on mitigation.	The Applicant refers to its response to WR-TPC-021.
WR-TPC-044	Water Environment Ground Conditions	There is no consideration of the development exacerbating surface-water drainage issues on land and homes, as well as the risks of contamination to underground water sources.	The Applicant refers to its response to WR-TPC-015.
WR-TPC-045	Water Environment Ground Conditions	There needs to be tighter scrutiny of the impact on soil and drainage of Land Sites 2A, 2B and 2C, as well as the access roads and cable corridors.	Access tracks will have surface water drainage systems (both within fields and for internal haul routes within the Cable Route Corridor). Sub-Sites 2A-2C will consist of Solar PV Arrays which will be raised up on narrow supports at an appropriate freeboard above the ground/anticipated surface water flood depths. This mitigation is secured within the **Design Principles, Parameters and Commitments [REP1-078]**. Site 2A has been graded as ALC Subgrade 3a. Sites 2B and 2C have been graded as Grade 2 land quality. Impacts upon agricultural land quality and soils for Sites 1 – 10 and the BESS have been

ID	Theme	Comments/Issues Raised	Applicant's Response
			assessed within **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** which has found that during the construction phase there will be a significant effect upon agricultural land from permanent land take. Durning the operation and decommissioning phase there are no significant effects upon agricultural land. During the construction phase, operation phase and decommissioning phase there are no significant effects on soils. The Cable Route Corridor (CRC) will be subject to soil surveys to record soil physical characteristics such as horizon depth, texture and ALC grade prior to construction as set out in the **Outline SRMP [APP-204]**. The ALC of the CRC will be undertaken pre-construction, once the cable route has been refined to a specific alignment within the CRC. The deferral of ALC and soil surveys in cable route corridors has been accepted by Natural England and the Secretary of State on other solar NSIPs. For example: 1. EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			CRC survey can be controlled under the DCO; 2. EN010123 Heckington Fen where the SoS decision letter at 4.23 refers to the final SoCG with NE [REP5-048] in which agreement to a post DCO soil survey including ALC was reached. It is anticipated that for the CRC, there will be limited impact from the works on agricultural land and soils due to the works to install the cabling will take place over narrow strips of land and will be of short duration. The works will be carried out in accordance with the detailed SRMP which will be submitted and approved by the relevant planning authority, as secured by Requirement 18 in the **Draft DCO [REP1-014].**
WR-TPC-046	Water Environment Ground Conditions	Residents and farmers are concerned at the potential for contamination of private boreholes, thereby removing their suitability for use on land, livestock or domestic use.	The Applicant refers to its response to WR-TPC-015. Pollution management measures are incorporated into each phase of the Scheme and are secured through the **Outline CEMP [REP1-058], Outline OEMP [REP1-060] and Outline DEMP [REP1-062]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-047	BESS Safety	The BESS is of great safety concern. The project identifies a fire-water facility but does not include inspections by the Fire Service during the lifetime of the project to ensure ongoing compliance with a viable water supply always stored on site. There is no protection of groundwater supplies in the event of a fire requiring water cooling control. The Parish Council is deeply concerned that adding a project substation will greatly increase the risk to the village, its inhabitants, their homes, businesses, wildlife and plants, trees and hedges of field fires arising from a similar occurrence.	Section 5.1.8 of the Applicant's **Outline BSMP [REP1-066]** stipulates that: "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 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." Section 2 of the **Outline BSMP [REP1-066]** documents the Applicant's consultation with Norfolk Fire and Rescue Service (NFRS). Sections 2.1.1 and 2.1.5 stipulate that engagement with NFRS will continue across the project lifecycle, this is secured through the DCO and NFRS is a statutory consultee for the Scheme. 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*

ID	Theme	Comments/Issues Raised	Applicant's Response
			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 **Outline BSMP [REP1-066]** 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 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. Regarding substations, the Applicant has assessed the risks within **ES Volume 1, Chapter 18 – Other Environmental Matter [APP-054]** within the Major Accidents and Disasters section which includes fires. Additionally, the Applicant refers to its response to Norfolk County Council under NCC-005 in **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**, to Great Moulton Action Group under GMAG-176 and GMAG-177, and to Block East Pye Solar under BEPS-276, BEPS-280 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** Furthermore, the Applicant refers to its response to MAD-002 in **The Applicant's Response to Relevant Representations Part 5 - By Theme [PDA-012]**, and to BEPS-PDA-027 in **The Applicant's Responses to Procedural Deadline A and**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Additional Submissions [REP1-103]. The responses address substation fire and explosion risks, including transformer oil leaks, contaminated firefighting water and potential environmental impacts. They explain that risks have been assessed within the Environmental Statement and would be managed through embedded mitigation, including transformer bunding, impermeable drainage systems and pollution-control measures.
WR-TPC-048	Socio-Economics	The Parish Council is concerned that insurers may consider the project is introducing greater risks on properties and take decisions to increase premiums or exclude them altogether. If that were to occur it is likely to have a detrimental impact on the value of properties.	Whilst the Applicant acknowledges that impacts to property prices is a concern for neighbouring residents and businesses, published research and evidence to date does not indicate that solar farms have a significant adverse long term effect to nearby property values. This is because there is no empirical evidence that industrial scale solar farms cause significant long term adverse effects on property prices. Whilst it is acknowledged that there have been no known studies of completed >50MW solar Schemes in the UK, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference

ID	Theme	Comments/Issues Raised	Applicant's Response
			between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.
WR-TPC-049	Transport and Access	The EPS project will add many more vehicles. As well as passenger vehicles for construction and maintenance workers, they will include HGVs and AILs. The larger vehicles are completely incompatible with the width and construction of the majority of the roads in the parish. The figures and times given for existing traffic, bus times and routes and peak travel times are incomplete, incorrect or misleading. There are only three short pedestrian pavements in the village. The remaining roads and lanes have none at all. Walking and cycling is therefore along the roadway.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on local roads used by pedestrians and cyclists. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023). This assessment included consideration of the sensitivity of highway links and the presence of vulnerable road users where relevant. The suitability of the proposed construction routes informed the development of the construction traffic strategy and associated mitigation measures. Vehicle tracking assessments were undertaken to demonstrate that the proposed vehicle types could safely access the relevant parts of the Scheme using the proposed routes. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to minimise impacts on local roads and other users of the highway network.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-050	Socio-Economics	Hospitality succeeds due only to the current tranquil rural PRoWs and their immediate environment. Visitors come for walking, cycling, wildlife, flora and scenic photography, to relax and recover from living in more built-up areas and to explore the history.	The Applicant refers to the response to WR-TPC-034.
WR-TPC-051	Socio-Economics	During construction over three years these activities will be severely curtailed by extra traffic including HGVs and AILs. Thereafter boundary fencing, security lighting, maintenance work and associated traffic, battery and inverter noise will create an area which is unsuited to leisure.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on recreational activities and non-motorised users. The Applicant notes that the construction period for the Scheme is anticipated to be approximately two years rather than three years. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023), which represents recognised industry best practice. This assessment included consideration of the effects of construction traffic on non-motorised user amenity and the significance of those effects was determined in accordance with the ISIP methodology. Operational noise from the solar inverters, Project Substations, National Grid Substation and other operational equipment has been assessed in **ES**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Volume 1, Chapter 12 – Noise and Vibration [APP-048], supported by **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**. The final equipment and layout will be subject to detailed design. The **Outline OEMP [REP1-060]** secures measures including at residential receptors other than those closest to the BESS, the secured control requires the overall free-field rating level from the Scheme not to exceed the background sound level or 30 dB $L_{Ar,Tr}$, whichever is higher. Specific controls also apply at the receptors nearest the BESS. These limits provide an objective basis for controlling operational noise in the context of the existing rural sound environment. The assessments conclude that, with the identified mitigation and controls in place, significant adverse noise effects are not anticipated.
WR-TPC-052	Public Rights of Way	The current tranquillity of the PRoWs is invaluable to physical and mental health. It is vital to retain existing safe and integrated routes throughout the parish.	The Applicant acknowledges the importance of Public Rights of Way to physical and mental wellbeing, including the contribution that access to nature, recreation and tranquillity can make to quality of life. The Human Health Summary Statement contained within **ES Volume 1, Chapter 18 -Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**

ID	Theme	Comments/Issues Raised	Applicant's Response
			recognise that changes to landscape character, visual amenity, recreation and access to nature can influence wellbeing, sense of place and users' experience of recreational routes (see sections 18.6.111 of Human Health Summary Statement and Table 8.2: Operational Phase: Changes in Views and Landscape Character of Equality Impact Assessment). No permanent Public Rights of Way closures are proposed. The **Outline PRoWPPMP [APP-203]** provides a framework for maintaining safe access during construction, operation and decommissioning. Existing PRoWs would be retained within open corridors with a minimum 15m buffer from Scheme infrastructure, supported by landscape planting and screening. The Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** concludes that, whilst some users may experience temporary changes to the character and visual amenity of routes, accessibility to communities and services, opportunities for recreation and perceptions of safety would be maintained at levels that do not materially affect physical or mental wellbeing. Landscape and visual effects are also expected to reduce over time as mitigation planting establishes (see sections 18.6.122 to 18.6.124).

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-TPC-053	Ecology and Biodiversity	Fencing restricts wildlife communities. Deer roam the area, East Anglia is the last stronghold of brown hares and hedgehogs are rapidly declining due to the loss of large areas of rural habitats.	Deer species do not receive direct legislative protection relevant to ecology or nature conservation, whilst deer species are not listed as Priority species, albeit may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). It was agreed through the EIA scoping process that the only mammal species which would be assessed and which do not warrant full legal protection would be those listed within Section 41 of the Natural Environment and Rural Communities Act 2006. The Planning Inspectorate agreed that 'subject to the agreement of relevant consultees, the Inspectorate agrees that significant effects are unlikely to occur on these species' and the matter could be scoped out. The Scheme's operational phase is considered likely to benefit these priority species through habitat improvements created for wider BNG purposes and with the provision of precautionary pollution prevention measures provided within the **Outline OEMP [REP1-060]**. 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 ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach

ID	Theme	Comments/Issues Raised	Applicant's Response
			to balance the extent of perimeter fencing in the landscape with these green corridors. The indicative alignment of perimeter fencing is shown on **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025].** Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the **Draft DCO [REP1-014].** Protection measures for brown hare and hedgehogs are described in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050].** Management of retained and newly created habitats that will benefit wildlife (including hares) are prescribed within the **Outline LEMP [REP1-064].**
WR-TPC-054	Cumulative Effects, In-Combination Impacts	The listing of all aspects of the project separately masks the real scale, the permanent nature and severity of the impacts on Best and Most Versatile prime food-producing agricultural land, landscape character, residential amenity, public rights of way, soil resources and nearby rural communities. The project will change the locality from rural farms and homes within a peaceful	**ES Volume 1, Chapter 4 – The Scheme [REP1-022]** details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant. The ES is therefore reflective of the Scheme proposed. The design of the development and in turn the environmental assessment follow the principles of the Rochdale Envelope, which allows for flexibility within the project proposals whilst allowing for the assessment of the worst-case scenario.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and natural setting to an urbanised developed industrial environment.	
WR-TPC-055	Consultation and Engagement	Tivetshall Parish Council did not receive direct communication from the Applicant during the consultation period.	Tivetshall Parish Council was notified of all phases of consultation and was identified as a host parish council within the core consultation zone as set out in the **Consultation Report [APP-024]**. Furthermore, Tivetshall Parish Council is presented in the Applicant's Section 42 Consultee List, presented in **Consultation Report Appendix 7: Section 42 Consultation Materials [APP-031]**.
WR-TPC-056	Transport and Access	Tivetshall Parish Council Speed Awareness Machine monthly data is shared at the formal parish council meeting and a copy is sent to Norfolk Police. Two reports were supplied showing the data collected in the 28 days up to 7 July 2026.	The Applicant notes the information provided regarding the operation of the Tivetshall Parish Council Speed Awareness Machine and the associated traffic data shared with Norfolk Police. The traffic surveys and assessment used within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** are described within **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]** and form the basis of the transport assessment.

2.12 Topcroft Parish Council

Table 2.12 Applicant's response to Topcroft Parish Council [REP1-236] and [REP1-381]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-ToPC-001	Need for the Scheme	Topcroft Parish Council is in favour of relying less on fossil fuels and understands the need for solar panels in the right place, but does not believe this should happen at the expense of way of life, countryside, tourism, businesses, outdoor pursuits and health and wellbeing.	The Applicant welcomes the Parish Council's support for relying less on fossil fuels its understanding of the need for appropriately placed solar panels. In relation to supporting the need for the Scheme, the Applicant refers to its response to ToPC-006 in T**he Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.
WR-ToPC-002	General	The Council describes East Pye as an industrial-scale imposition that would permanently disfigure countryside, destroy productive agricultural land and compromise rural infrastructure.	The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. 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]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening / reinforcing existing hedgerows

ID	Theme	Comments/Issues Raised	Applicant's Response
			(infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The wider sustainability benefits delivered by the Scheme, which include low carbon electricity in support of Government's energy policy aims, green infrastructure and habitat creation, provision of permissive paths and community accessible space, job education and skills creation. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. Additionally, decommissioning is expected to occur after the 60-year design life of the Scheme; 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). Post-decommissioning, the landowners would choose how the land is to be used and managed, with the exception of the National Grid Substation and the Grid Connection Infrastructure. The landowner may return all of the land to agricultural use, although it is likely that

ID	Theme	Comments/Issues Raised	Applicant's Response
			established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate.
WR-ToPC-003	Cumulative Effects, In-Combination Impacts	For Topcroft and surrounding parishes, the project would shift the reality from peaceful food-producing rural communities to a sprawling industrial energy zone, with cumulative effects from other projects.	The technical chapters of **ES Volume 1 [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 cumulative effects assessment of the ES has been undertaken in line with the EIA Regulations and the PINS Advice on Cumulative Assessment and is considered to a robust yet proportionate approach to assessing the cumulative impacts of the Scheme.
WR-ToPC-004	Socio-Economics	South Norfolk relies heavily on tourism, countryside recreation and local businesses and the Council considers miles of security fencing and solar arrays would adversely affect pubs, farm shops, holiday lets and other businesses.	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects.

ID	Theme	Comments/Issues Raised	Applicant's Response
			There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be addressed through an agreed compensation arrangement.
WR-ToPC-005	Public Rights of Way	Enclosing footpaths and country lanes in security fencing and industrial solar arrays would harm recreation and local quality of life.	The Applicant acknowledges concerns that Public Rights of Way and country lanes could become enclosed by security fencing and solar infrastructure. Existing Public Rights of Way would be retained within open corridors and would maintain a minimum 15 m buffer from Scheme infrastructure, including fencing. These corridors would be supported by landscape planting and screening, and no permanent Public Rights of Way closures are proposed. **The Outline PRoWPPMP [APP-203]** provides a framework to maintain access throughout construction, operation and decommissioning. The Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]** recognise that changes to the character and visual experience of routes may influence recreation, wellbeing and connection to nature. These matters have been considered within the assessment with

ID	Theme	Comments/Issues Raised	Applicant's Response
			no significant health and wellbeing effects identified. In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum supports the conclusions within the Human Health Statement and Equality Impact Assessment and concludes that significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups.
WR-ToPC-006	Ecology and Biodiversity	The project sits within core foraging and maternity zones of Barbastelle bats, including around Spring Wood, an ancient woodland used for wellbeing and recreation.	The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The Scheme design primarily utilise 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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 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 **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 of bats, including barbastelle bats. Of particular note, a minimum 15m buffer will be applied to woodland (non-ancient) and a minimum 30m buffer will be applied to all ancient woodland immediately adjacent to the Order Limits, with habitat creation and enhancement within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing lo enhanced supporting habitats surrounding woodland parcels

ID	Theme	Comments/Issues Raised	Applicant's Response
			for the benefit of barbastelle bats (if present), thereby contributing towards the species favourable conservation status. A buffer zone of 10m will be delivered between hedgerows and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**. With regard the comment relating peer-reviewed research, the Applicant assumes that this comment is received in relation to Tinsley et al., (2023)2, which claims to show a strong negative effect of Solar PV developments on foraging and commuting bats. However, there are several caveats which suggest that this study is not overly reliable (Do solar farms affect foraging & commuting bats? - BSG Ecology3), and the findings of this study have been challenged. Conversely, other academic studies have also emerged recently which indicate the benefit of Solar PV sites for bat species. More guidance will be published on bats and solar PV sites, as the Bat Conservation Trust are currently working with Natural Resources Wales to provide a comprehensive synthesis of the available evidence on the interactions between solar energy

ID	Theme	Comments/Issues Raised	Applicant's Response
			developments and bat populations. Therefore, currently, there is no wholly reliable evidence to suggest that solar PV sites, present a potentially significant negative impact upon bats when cited within sub-optimal habitats. Nevertheless, as a precautionary measure, the embedded design principles include for minimum buffers between habitats of value to barbastelle bats and solar PV apparatus. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the **Outline LEMP [REP1-064]**. When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure.
WR-ToPC-007	Ecology and Biodiversity	The Council considers removal of trees and hedgerows, artificial lighting and solar arrays would disrupt bat flight lines and normal behaviour.	As set out in the **Outline CEMP [REP1-058]**, where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Where hedgerow removal is required, no more than 10m will be removed in accordance with the requirements set out within the **Outline LEMP [REP1-064]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. A full assessment of bats and barbastelle populations is presented in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** with details of bat surveys and desk study records of where bats occur within the Order Limits is presented in **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157].**
WR-ToPC-008	Soils and Agriculture	The Council objects to the loss of thousands of acres of productive high-grade agricultural farmland during a time of national food insecurity.	The Applicant notes this comment and refers to its response to Long Stratton Town Council under WR-LSTC-010 in this document.
WR-ToPC-009	BESS Safety	The Council has deep concerns regarding the scale of proposed BESS and the risk of thermal runaway, which it considers local lanes and emergency services ill-equipped to handle.	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

ID	Theme	Comments/Issues Raised	Applicant's Response
			firefighters do not have to drive through a smoke or gas plume to access the BESS Compound. 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.
WR-ToPC-010	Transport and Access	The Council considers years of heavy construction traffic would decimate the fragile road network.	The Applicant acknowledges the concerns raised regarding the potential effects of construction traffic on the local highway network. The Applicant notes that the construction period for the Scheme is anticipated to be approximately two years. However, individual elements of the Scheme would not be under construction continuously throughout this period. Figure 2.1 of the **Outline CTMP [REP1-068]** demonstrates that construction activities are

ID	Theme	Comments/Issues Raised	Applicant's Response
			phased and staggered throughout the construction programme. Consequently, many construction activities would only occur for a limited period and would not all take place at the same time. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023) and were not identified as resulting in significant effects. The Applicant also notes that, where appropriate, pre-construction condition surveys would be undertaken in accordance with Section 7.14 of the **Outline CTMP [REP1-068]**. The Applicant does not propose permanent damage to the local highway network. Nevertheless, where temporary alterations are required to facilitate construction traffic, any affected areas would be reinstated following completion of the relevant works and returned to their previous condition, where appropriate.
WR-ToPC-011	Consultation and Engagement	The Council considers the process structurally discriminatory against people without computer literacy, time or ability to navigate vast technical material.	The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. USB memory sticks with the full suite of Application documentation were made available for electronic inspection during the Relevant Representation

ID	Theme	Comments/Issues Raised	Applicant's Response
		The developer has generated thousands of pages of highly technical, dense and sometimes misleading documentation and the Council considers this makes the process difficult or impossible for ordinary residents and businesses to follow.	period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library. Further details have been published on the Applicant's website. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request.
WR-ToPC-013	Site Selection, Alternatives and Design Evolution	The Council points to brownfield sites and rooftops as alternative ways of meeting renewable targets.	The Applicant notes this comment and refers to its response to ToPC-004 within the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**. As set out within the **Site Selection Assessment [APP-215],** no brownfield sites of sufficient size to accommodate the Scheme were identified within 20km of the Point of Connection.
WR-ToPC-014	Concluding remarks	Topcroft Parish Council urges the ExA to protect heritage, environment, food security and local democracy and firmly recommends refusal of the Development Consent Order.	The Applicant notes this comment.

2.13 Wacton Parish Council

Table 2.13 Applicant's response to Wacton Parish Council [REP1-295]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WPC-001	General	Wacton Parish objects to the East Pye Solar Scheme in its entirety. The objection is not limited to individual elements but concerns the scale, extent, cumulative effects and fundamental change it would bring to the rural area. Wacton does not object to renewable energy in principle. The objection is to retaining Sub-Site 2C without a sufficiently clear, evidence-based and Wacton-specific justification.	The Applicant welcomes the Council's confirmation that it does not object to renewable energy in principle. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme including Sub-Site 2C) that outweigh the less substantial harm identified, as set out within the **Planning Statement [REP1-074]**. 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. Potential environmental impacts associated with Sub-Site 2C has been assessed within the **ES [APP-036 to APP-195]**. Sub-Site 2C is considered to be appropriate for inclusion in the Scheme against the environmental, planning, technical, and land factors set out within the **Site Selection Assessment [APP-215]** in line with Section 2.3

ID	Theme	Comments/Issues Raised	Applicant's Response
			and 2.10 of NPS EN-3 which sets out the factors influencing site selection.
WR-WPC-002	Landscape and Visual	Wacton's objection concerns the change from open agricultural land to panels, fencing, inverter infrastructure, access tracks, CCTV and associated works.	The Applicant notes this comment.
WR-WPC-003	Cultural Heritage	Wacton's heritage case is principally about setting. Important assets include Wacton Hall and All Saints Church, while the Conservation Area derives much of its character from openness and its relationship with the countryside. East Pye should demonstrate in one Wacton-specific assessment how Sub-Site 2C and wider grid/solar infrastructure affect the Conservation Area, Wacton Common, PRoWs, church and valley-side approaches.	The Applicant notes that an assessment of effects upon cultural heritage assets has been provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. These assessments noted that assessment of Wacton Conservation Area was not taken forwards for further assessment as it was considered that there would be no impact to this assets character and appearance by the Scheme. Likewise, assessment of potential impacts to the setting and significance of both the Grade I Listed Church of All Saints (NHLE 1372999) and the Grade II* Wacton Hall (NHLE 1050822) were also not taken forwards, as it was considered that there would be no harm by the Scheme to these designated heritage assets. As such, the Applicant does not believe it is required to supply an additional assessment upon Wacton Conservation Area and the heritage assets within.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WPC-004	Ecology and Biodiversity	Sub-Site 2C contains ponds, ditches, hedgerows, trees, field margins and a woodland edge and Site 2 was surveyed later than areas within the earlier survey boundary. The Council asks for a Site 2C ecological gap analysis identifying survey dates, seasonal limitations, access constraints, protected-species receptors, mitigation and licensing dependencies.	Ecology survey scope and methodology for Site 2 and all sites were agreed through statutory scoping processes, with relevant assessment set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and detailed survey methodology/limitations/constraints and mitigation detailed within the accompanying technical appendices. Embedded design principles are detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**. These include relevant considerations for Site 2 including standoff distances from woodlands, ditches, hedgerows and ponds. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the **Outline LEMP [REP1-064]**.
WR-WPC-005	Ecology and Biodiversity	East Pye should demonstrate how Sub-Site 2C contributes to Barbastelle foraging, commuting and connectivity and that the final layout would not undermine protected-species conservation status.	The Applicant refer to its response to Hedenham Parish Meeting under HePC-007 in the **Applicant's Response to Relevant Representations Part 4 – Parish Councils [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WPC-006	Water Environment	Wacton treats water and ground conditions as an integrated issue. Site 2C contains ponds and ditches in a landscape where shallow groundwater, field drainage, surface-water pathways and private-water interests may interact.	The built infrastructure elements of the Scheme that are proposed within Sub-Site 2C are Solar PV Arrays, standalone converter/inverter units, in addition to internal access. Built infrastructure will be located at least 10 metres away from the top of bank of watercourses and the sequential approach has been applied to locate infrastructure within areas of lowest flood risk as far as reasonably practicable. Limited areas of Solar PV Arrays are located within 'low' to 'high' surface water flood risk areas, however the Solar PV Arrays will be raised on narrow supports at an appropriate freeboard above the ground/anticipated flood depths and as such will not have a significant impact on flood flow routes. The ground cover beneath the Arrays will be natural grass, and therefore the existing regime will be retained across Sub-Site 2C. Standalone/inverter units and access tracks will have surface water drainage systems in place with appropriate outfalls where required. The above flood risk mitigation is secured within the **Design Principles, Parameters and Commitments [REP1-078]**. Impacts to private water supplies within the 250m Study Area surrounding sub-Site 2C are considered highly unlikely as there do not appear

ID	Theme	Comments/Issues Raised	Applicant's Response
			to be any properties which may benefit from private water supplies within the Study Area. The nearest recorded abstraction is a BGS water well and EA permitted abstraction located approximately 750m to the east. It is further noted that Sources of Potential Contamination (SPCs) that could be mobilised by the construction of the Scheme have not been identified within sub-Site 2C and that this sub-Site appears to have a long-standing history of agricultural use.
WR-WPC-007	Water Environment	The final design must demonstrate source-pathway-receptor control for runoff, trenching, compaction, sediment, spills and altered infiltration rather than rely principally on generic outline management measures.	The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). The GQRA will refine the Conceptual Site Model (including the potential source-pathway-receptor contaminant linkages) identified in **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]**. The majority of the Order Limits will consist of Solar PV Arrays which will be raised up on narrow supports at an appropriate freeboard above the

ID	Theme	Comments/Issues Raised	Applicant's Response
			ground/anticipated flood depths. The ground beneath the Arrays will be natural grass cover which will provide soil stabilisation mimic the existing drainage regime. The **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]** set out mitigation for the management of sediment and pollutant mobilisation during the construction and decommissioning phases of the Scheme. As such, with the mitigation in place, source-pathway-receptor links should not occur.
WR-WPC-008	Water Environment	East Pye must establish the local hydrogeological baseline and interaction with ponds, ditches, shallow groundwater, private supplies and ecological receptors.	The Applicant refers to its response to Tivetshall Parish Council under WR-TPC-015 in this document.
WR-WPC-009	Glint and Glare	Because the parcel lies close to the A140, the current glint-and-glare position must be clear as a highway-safety issue and outstanding consultee concerns and controls relied upon should be confirmed.	The Applicant has assessed both fixed and single-axis tracking panels for a 4.2-km section of the A140 in **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025]** to **[AS029]**. The assessment concludes that screening in the form of existing vegetation, buildings and intervening terrain is predicted to significantly obstruct views of reflecting panels. Any potential impacts are further mitigated by the Applicant's implementation of vegetation as part of the landscape plan. A

ID	Theme	Comments/Issues Raised	Applicant's Response
			significant impact upon road users of the A140 is not predicted.
WR-WPC-010	Aviation (Tibenham)	East Pye should give a definitive aviation position under the Tibenham Airfield evidence, including any unresolved safeguarding or emergency-landing constraints.	The Applicant continues to engage with Norfolk Gliding Club, who operate from Tibenham Airfield, regarding the impact upon their safeguarding concerns. The comments and issues raised by WR-WPC-010 were discussed at a meeting with Norfolk Gliding Club on 14/10/26. An updated SoCG will be submitted at Deadline 3 to provide an update on matters under discussion and engagement.
WR-WPC-011	Utilities	The Council relies on local evidence concerning B4RN community fibre and other utilities at field edges, verges and access routes and asks for a verified utilities protection schedule and outage-response plan.	The Applicant refers to its response to Morningthorpe and Fritton Parish Council under WR-MFPC-022 in this document regarding utilities. The Applicant refers to Schedule 14 to the **Draft DCO [REP1-014]** which includes protective provisions for the benefit of statutory undertakers (including electricity, gas, water and sewerage undertakers) and electronic communications code network operators. These provisions ensure that utilities are adequately protected during the construction, operation and decommissioning of the Scheme.
WR-WPC-012	Site Selection, Alternatives and	Design evolution shows mitigation and reduction, but mitigation after selection	NPS EN-1 Paragraph 4.3.9 confirms that, from a policy perspective, there is no general requirement

ID	Theme	Comments/Issues Raised	Applicant's Response
	Design Evolution	does not answer the alternatives question.	to consider alternatives or to establish whether a development represents the best option. Notwithstanding, the Applicant has considered potential reasonable alternatives to the Scheme, as set out in the **Site Selection Assessment [APP-215]** and **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**. As set out within **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**, the design evolution of the Scheme within Sub-Site 2C includes the addition of setbacks along the western boundary of Sub-Site 2C from existing landscape, ecological, and water features.
WR-WPC-013	Site Selection, Alternatives and Design Evolution	The Council asks why Sub-Site 2C was retained, what land or panel area was removed at each stage, which receptors drove changes and whether further reduction, larger setbacks or whole-field removal were tested.	Sub-Site 2C is included within the Scheme because it is considered to be suitable against the Applicant's criteria for site selection. The design evolution of Sub-Site 2C is summarised within **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**. At Stage 1, the maximum extent of the Solar PV Arrays was considered for Sub-Site 2C with setbacks along the western boundary for the provision of a potential mitigation area, reflecting initial considerations relating to key policy tests, environmental and community constraints and

ID	Theme	Comments/Issues Raised	Applicant's Response
			early understanding of the site context. At Stage 2, setbacks were increased along the western boundary owing to the presence of water features and to accommodate offset buffers to existing hedgerows, trees and field margins, in accordance with Design Principle 2.2 (retention and enhancement of existing vegetation and features of value). The identified constraints within Sub-Site 2C (watercourses, hedgerows and field margins along the western boundary) were considered to be capable of being satisfactorily addressed through the embedded buffers, offsets and landscape mitigation secured through the **Design Principles, Parameters and Commitments [REP1-078]** and the **Outline LEMP [REP1-064]**, and therefore it has been retained within the Scheme.
WR-WPC-014	Consultation and Engagement Examination process	The Council residents had to reconstruct the effect of Sub-Site 2C and the wider Scheme from a dispersed document set and the Council asks whether residents had sufficient information to participate meaningfully.	The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. USB memory sticks with the full suite of Application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Further details have been published on the Applicant's website. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Community Relations team has been available to assist members of the public via a series of free-to-use communication channels (phone, post and email). Members of the public are welcomed to use these channels to ask about the application documents, as well as how to access and read Scheme maps.
WR-WPC-015	Scheme Description	The Point of Connection/National Grid Substation at Site 1B is material to Wacton because it changes the wider landscape experienced from the village, Wacton Common, PRoWs, the Conservation Area and valley-side approaches.	The Applicant notes the comment. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices assess landscape and visual effects on a range of receptors within the study area at defined phases including construction, year 1, year 15 and decommissioning, including views from Wacton Common, and the PRoW network. In a worst case the Scheme (the built infrastructure within Sub-Site 2B and 2C to the south and southeast, and tall elements within the National Grid Substation and Grid Connection Infrastructure

ID	Theme	Comments/Issues Raised	Applicant's Response
			to the southwest) would be heavily filtered by intervening vegetation and features within the landscape. The Scheme would not alter the immediate relationship between the village and adjacent countryside due to distance and intervening features (which include existing transmission infrastructure).
WR-WPC-016	Scheme Description	The substation represents major electricity infrastructure with potential effects from construction traffic and abnormal loads, operational noise, lighting, overhead-line works, access changes and long-term visual industrialisation. The National Grid Substation would remain after time-limited generating elements are removed, and East Pye should demonstrate that the permanent POC location is the least harmful reasonable option.	The environmental impacts of the National Grid Substation have been assessed and are reported within the **ES [APP-036 to APP-195]**. The site selection exercise undertaken for the National Grid Substation is set out within the **Site Selection Assessment [APP-215]** and was shaped by four main considerations: • The capacity of the grid in accordance with NPS EN-3 Paragraph 2.1.14 (Section 3.2 of the **Site Selection Assessment [APP-215])**; • The Horlock and Holford Rules (Sections 3.3 and 3.4 of the **Site Selection Assessment [APP-215]**). • Accessibility for Abnormal Indivisible Loads (Section 3.4 of the **Site Selection Assessment [APP-215]**);

ID	Theme	Comments/Issues Raised	Applicant's Response
			• Proximity to the 400kV Overhead Line (Section 3.4 of the **Site Selection Assessment [APP-215]**). Consideration of reasonable alternatives to the National Grid Substation is further set out within the **Site Selection Assessment [APP-215].** Paragraph 4.3.24 of NPS EN-1 states that the Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals. The Applicant further refers to the response provided to ISH Action Point 1 within the **Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-098]**.
WR-WPC-017	Cumulative Effects, In-Combination Impacts	Sub-Site 2C cannot be treated as a self-contained solar field. Wacton will experience combined effects of Site 2C, the remainder of Site 2, cable corridors, construction traffic and wider BESS, substations, National Grid and overhead-line works.	The Applicant notes this comment and refers to its response to Brooke Parish Council under WR-BPC-005 in this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Traffic, noise, lighting, dust, fencing, loss of open views, drainage change and habitat disturbance may occur together and be prolonged by overlapping programmes.	
WR-WPC-018	Scheme Description	The Council asks for a corrected/current Site 2 and Sub-Site 2C plan and infrastructure schedule using consistent terminology.	The relevant works proposed within Sub-Site 2C are shown on Sheet 18 of the **Works Plan Part 2 [REP1-006]**. These comprise Work No. 1 (including 1(d), Work No.7, and Work No. 10. The maximum design parameters and relevant principles, and commitments which control the works proposed within Sub-Site 2C are set out within the **Design Principles, Parameters and Commitments [REP1-078]** under Tables 4.1, 4.7, and 4.10.
WR-WPC-019	Site Selection, Alternatives and Design Evolution	The Council asks for a design-evolution and reasonable-alternatives note, including further reduction and whole-field deletion options and reasons for rejection.	The design evolution of the Scheme is set out within the **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** and the **Design Approach Document [APP-212]**. As set out at WR-WCPC-001, given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme including Sub-Site 2C) that outweigh the less substantial harm identified, as set out within the **Planning**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Statement [REP1-074]. 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.
WR-WPC-020	Draft DCO	The Council asks for a schedule of all environmentally material parameters still flexible at Sub-Site 2C, the worst case assessed and the DCO requirement or commitment that secures each control.	The worst-case parameters which have been assessed are set out within the **Design Principles, Parameters and Commitments [REP1-078]** and **ES Chapter 4 – The Scheme [REP1-022].** The design parameters and commitments set out are secured by Requirement 5 in **the Draft DCO [REP1-014]**. These would prescribe the guiding design parameters and commitments of the detailed design of the Scheme post consent. A degree of flexibility is sought within the design envelope of the Scheme as part of the DCO Application so that the detailed design of the Scheme can be informed by technical considerations, post-consent work and innovation in technology. When the detailed design for the Scheme is submitted for approval to the relevant local planning authorities pursuant to the detailed design approval DCO Requirement, those details must accord with the relevant parameters and commitments set out in the **Design Principles, Parameters and Commitments [REP1-078]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WPC-021	EIA Methodology	The Council asks for a Wacton-specific landscape, heritage and PRoW assessment, a Site 2C ecology gap/receptor map and a water, drainage, groundwater and private-water receptor plan.	The likely effects of the Scheme during the construction, operation and decommissioning phases are assessed in the **ES [APP-036 to APP 195]**, including in relation to Sub-Site 2C. The effects of the Scheme, including the Scheme elements within Site 2C, on landscape, heritage, ecology, and the water environment are presented within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], ES Volume 1, ES Chapter 8 – Ecology and Biodiversity [APP-044],** and **ES Volume 1, Chapter r9 – Water Environment [APP-045],** respectively. The baseline habitats within the Order Limits are shown on **ES Volume 2- Figure 8.6 - Habitat Survey Results [APP-091].** The location of recorded private water supplies are shown on **ES Volume 2, Figure 16.5 Locations of Private Water Supplies [APP-109]. Figures showing flood extents** are provided within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052].** The receptors assessed within the ES are defined on a topic-specific basis and set out within the respective topic chapters **[APP-042 to APP-056]**. Relevant receptors within settlements and communities are identified where pertinent to the assessment being undertaken. The Applicant considers that the ES provides sufficient

ID	Theme	Comments/Issues Raised	Applicant's Response
			information to identify the receptors relevant to each assessment.
WR-WPC-022	Transport and Access	The Council asks for a route-by-route construction, abnormal-load and highway-works schedule, verified utilities protection plan and Wacton-specific National Grid Substation assessment.	The Applicant notes the request for additional information regarding construction traffic flows, AIL movements and highway works. Route-by-route construction traffic flows are provided within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]** and form the basis of the transport assessment. Highway works associated with the Scheme are shown on the **Streets Plan [REP1-007]**. In relation to Wacton, **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed construction traffic routes to the Scheme. Construction traffic is not proposed to route through Wacton and, accordingly, the Applicant does not consider that a Wacton-specific construction traffic assessment is required.
WR-WPC-023	Concluding remarks	East Pye has not yet demonstrated in one coherent and auditable body of evidence that Sub-Site 2C and its relationship with wider infrastructure can	The Applicant notes this comment and refers to the detailed responses provided above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		be retained without insufficiently assessed harm to Wacton.	

3 The Applicant's Response to Submissions Received by Non-Statutory Organisations at Deadline 1

3.1 CPRE Norfolk

Table 3.1 Applicant's Response to CPRE Norfolk [REP1-430]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CPRE-001	Need for the Scheme Site Selection, Alternatives and Design Evolution	CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation. However, support for renewable energy is not unconditional and development must be appropriately located and designed so that unacceptable harm is not caused to countryside, landscape character, tranquillity, agricultural land, heritage assets, public rights of way and rural communities. CPRE Norfolk considers that East Pye would introduce infrastructure on an unprecedented scale into a large area of attractive and tranquil countryside, across a dispersed network of sites stretching approximately 15km between Great Moulton/Tivetshall and Brooke/Seething.	The Applicant welcomes CPRE Norfolk's support for the transition to renewable energy and the urgent need to decarbonise electricity generation. The Applicant refers to its response to relevant representation CPRE-001 in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Its scale, dispersed nature and cumulative impacts would cause significant and long-lasting harm to the countryside.	
WR-CPRE-002	Landscape and Visual	The proposal would introduce an industrial-scale development into an open agricultural landscape, fundamentally altering its character. The large-scale installation of 4.5m solar panels, substations, battery storage facilities, access roads, fencing and CCTV infrastructure would create an extensive and visually intrusive feature across South Norfolk. CPRE Norfolk does not consider that screening can remove the landscape impacts of development on this scale. In many locations the proposed mitigation would itself result in the loss of valued open views and alter the character of public rights of way and rural lanes.	The Applicant refers to its response to relevant representation CPRE-004, CPRE-005, and CPRE-007 in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-CPRE-003	Landscape and Visual Noise and Vibration	Much of the East Pye scheme area lies within countryside identified by CPRE as highly tranquil. Solar infrastructure, substations, battery storage facilities, security fencing, CCTV systems, vehicle movements, operational noise and lighting would erode these qualities and diminish	The Applicant refers to its response to relevant representation CPRE-005, CPRE-009 and CPRE-010 in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the sense of tranquillity experienced by residents and visitors.	
WR-CPRE-004	Landscape and Visual	CPRE Norfolk considers that the Applicant's treatment of tranquillity mapping does not accurately reflect CPRE's published evidence and understates the importance of tranquillity within the scheme area. It states that the Applicant's map uses altered colouring and a key that makes areas of high tranquillity difficult to identify and is misleading and confusing for assessment purposes.	The Applicant refers to its response to Responses at Issue Specific Hearing 1 item no 27, within the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**.
WR-CPRE-005	Soils and Agriculture Site Selection, Alternatives and Design Evolution	CPRE Norfolk is not satisfied that the application robustly justifies the use of productive agricultural land, or that alternatives such as previously developed land, commercial rooftops, car parks or less sensitive sites have been properly explored. CPRE Norfolk considers greater priority should be given to solar generation on artificial surfaces. It cites UCL Energy Institute research for CPRE indicating that rooftops, car parks and other developed spaces could provide 40–50GW of solar	In relation to the need for the scheme and the Applicant's consideration of alternatives, the Applicant refers to its response to relevant representations CPRE-012 & CPRE-013 in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		energy in England by 2035 and potentially 117GW by 2050.	
WR-CPRE-006	Cultural Heritage	The proposal would affect the setting of numerous heritage assets and conservation areas. CPRE Norfolk considers that conservation areas such as Saxlingham Green and Fritton derive much of their significance from their relationship with the surrounding rural landscape and that industrialisation of that landscape would affect their setting and character.	Saxlingham Green, and Fritton Conservation Areas were included for assessment in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]**. These assessments concluded that based on the existing environmental baseline, as well as the proposed landscape mitigation in the form of extensive setbacks along the eastern boundary of Sub-Site 5B, which abuts The Street, as well as removal of Solar PV Panels from the south-eastern part of Sub-Site 5B, the Scheme will result in no likely significant effects to Fritton Conservation Area. In regard to Saxlingham Green Conservation Area, setbacks have been established within the northern parts of Sub-Sites 7D and 7F, the areas of the Scheme which extend closest to the southern boundary of the conservation area. Within the northernmost part of Sub-Site 7D and eastern part of Sub-Site 7F, Solar PV Panels have been removed from those fields which are situated adjacent the eastern and western approaches into the conservation area, with these areas to be retained as grassland. Several linear belts of broadleaf woodland will also be established within the northern parts of Sub-Site 7D and 7F, continuations of established

ID	Theme	Comments/Issues Raised	Applicant's Response
			woodland already present within the landscape south of Saxlingham Green. The significance of Saxlingham Green derives primarily from its preserved historic settlement layout, with the surrounding vegetation helping to enclose the village from views across the surrounding rural landscape. While there are a few gaps in the surrounding vegetation, these will be mitigated by proposed landscaping within Sub-Site 7D and 7F. These landscaping initiatives will ensure that the Scheme does not encroach upon Saxlingham Green. The Applicant also refers to its response provided to CPRE Norfolk's relevant representation [RR-0382] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID CPRE-003, CPRE-005 and CPRE-015.
WR-CPRE-007	Public Rights of Way Landscape and Visual	CPRE Norfolk is concerned that the proposal would diminish the recreational experience of the well-used public rights of way network through visual intrusion, loss of openness, extensive mitigation planting and the introduction of security infrastructure. It does not consider that the NPPF objective to protect and enhance public rights of way would be achieved.	The Applicant notes the concern about the Scheme's impact on recreational experience. A detailed landscape and visual assessment are reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and associated appendices, including a visual amenity assessment of Public Rights of Way is present in **ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]**

ID	Theme	Comments/Issues Raised	Applicant's Response
			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]**. 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. Such measures would provide visual screening and landscape integration. The Applicant considers the landscape in which the Scheme is located has varying degrees of visual openness and an understanding of the baseline and existing features has informed the mitigation strategy. Landscape and visual matters have been a key consideration throughout the design evolution. The provisions of the new NPPF (August 2026) are addressed in the **Planning Statement [REP1-074]** and the **Policy Compliance Document [REP1-076].**
WR-CPRE-008	Cumulative Effects, In-Combination Impacts	East Pye cannot be considered in isolation. CPRE Norfolk considers that the cumulative effect of solar farms, battery storage facilities, electricity transmission	See the Applicant's response to WR-GMPC-004 in Table 2.2 regarding the assessment of cumulative effects. As detailed within **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** no significant

ID	Theme	Comments/Issues Raised	Applicant's Response
	Socio-Economics	projects, substations and other major energy infrastructure risks progressively industrialising rural South Norfolk, and that the Applicant's assessment does not adequately reflect the wider context or the socio-economic impact on more than 20 local villages and communities.	adverse cumulative effects are anticipated, with several significant beneficial cumulative effects assessed**.**
WR-CPRE-009	Construction and Decommissioning Soils and Agriculture	CPRE Norfolk considers that the proposal lacks a clear decommissioning plan, long-term land stewardship strategy or legally enforceable mechanism to ensure restoration of land to its former agricultural use after the project's lifespan.	Decommissioning is outlined in the **Outline SRMP [APP-204]**. The **Outline SRMP** sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014]**. The Outline SRMP provides the structure and the types of controls to be included within the detailed SRMP. The outline SRMP sets out an outline of the matters that need to be defined or secured. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade. Monitoring procedures are outlined in the outline SRMP. The monitoring procedures to be included as a minimum are outlined from paragraphs 4.2.30 to 4.2.35 of the Outline SRMP.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Compaction will be monitored by inspecting the soils following the installation of the piles but prior to the installation of the PV panels, if compaction is found this will be remediated whilst the ground remains accessible. Compaction will be monitored during and after decommissioning works, if compaction is found this will be remediated once ground conditions permit, in line with the detailed SRMP. Any compaction that occurs during the operational phase and decommissioning phase will be remediated following the decommissioning stage. The land will be handed back to the respective landowners following decommissioning. There are currently no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade.
WR-CPRE-010	Policy compliance	CPRE Norfolk concludes that the adverse impacts of the scheme outweigh its benefits, that the proposal is inconsistent with national and local planning policy objectives for distinctive landscapes and sustainable rural communities, and requests that the Examining Authority recommend refusal of the Development Consent Order.	The Applicant does not agree that the adverse impacts of the Scheme outweigh its benefits. The ES demonstrates that, following mitigation, the majority of effects are either not significant or are limited in extent and duration. The Scheme would deliver substantial benefits through the generation of renewable electricity, support for energy security, and contribution towards the UK's decarbonisation objectives and legally binding net zero commitments. The Applicant considers that these benefits carry substantial weight and, when considered alongside the mitigation embedded within the design, clearly

ID	Theme	Comments/Issues Raised	Applicant's Response
			outweigh any residual adverse effects as outlined in the **Planning Statement [REP1-074]**.

3.2 Forncett Nature Matters

Table 3.2 Applicant's Response to Forncett Nature Matters [REP1-298]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-FNM-001	Water Environment Ecology and Biodiversity	The River Tas valley is described as an exceptional environment, with a rare chalk stream and fragile population of native crayfish whose biodiversity depends on the purity of streams and ditches flowing into it. Forncett Nature Matters considers that the eastern catchment would be affected by East Pye and raises evidence of cadmium and lead pollution identified at the Llanwern solar plant in Gwent.	The proposed elements of the Scheme will not use modules that contain cadmium. If components have lead in them, they will be small trace amounts, and leaching will not occur. The surface water drainage system for the BESS is designed to be sealed and isolatable to contain any contaminated runoff/firewater arising from a fire incident as secured within the **Outline BSMP [REP1-066]**. No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed Crayfish was undertaken with the findings in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160].** Measures to control pollution to watercourses are set out in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** and are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The River Tas is identified as a sensitive aquatic receptor and Avoidance Areas. At this locations, open-cut trenching and the launch and reception pits associated with trenchless techniques will be located outside the Avoidance Areas. The embedded design therefore protects potential white-clawed crayfish habitat within these watercourses, should the species be present, while pollution prevention measures secured through the **Outline CEMP [REP1-058]** further reduce the risk of indirect downstream effects. The Applicant notes the Examining Authority's (ExA) request, in the Rule 6 letter **[PD-005]**. The Applicant has provided an update on this at Procedural Deadline A within the document **Applicants Position on White Clawed Crayfish [PDA-007]**. If in the unlikely event that the species was recorded within watercourses within the Order Limits, adopted precautionary avoidance measures already mitigate impacts upon the species, and as a consequence the impact assessment conclusions would remain unchanged.
WR-FNM-002	BESS Safety Water Environment	Forncett Nature Matters considers that the BESS and substation create additional pollution risks in the event of fire or other emergency, when pollutants could flow through the valley. It highlights the sensitivity of chalk aquifers and the	As mentioned in previous responses within **The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**, the BESS, National Grid Substation and Project

ID	Theme	Comments/Issues Raised	Applicant's Response
		dependence of some businesses and residents on private water supplies and boreholes.	Substations will have lined surface water drainage systems for residual pollution management as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The BESS will have an isolatable drainage system for the containment of runoff in the event of a fire incident. This is secured within the **Outline BSMP [REP1-066]**. 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 **Outline BSMP [REP1-066]** documents the firefighting water capture and drainage strategy for the BESS area. The

ID	Theme	Comments/Issues Raised	Applicant's Response
			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 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. As such, the assessment within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** concludes that with the incorporation of the above mitigation for residual pollution management, the impacts to water receptors from these elements of the Scheme are 'Not Significant'.
WR-FNM-003	Water Environment	Forncett Nature Matters participated in Earthwatch's Fresh Water Watch in September 2026, helping to coordinate testing for nitrates and phosphates along the River Tas, and reports that low	The majority of the Scheme will include Solar PV Arrays which will not contain PFAS and they will be cleaned with distilled water as secured within the **Design Principles, Parameters and Commitments [REP1-078]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		pollution levels were found in the headwaters.	Surface water runoff/pollution management mitigation for all phases of the Scheme is set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. As such, the assessment within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** concludes that with the incorporation of the above mitigation for residual pollution management, the impacts to water receptors are 'Not Significant'. The cessation of agricultural/fertiliser use across a large area of the Order Limits will result in a reduction in nitrates and phosphates entering the River Tas and has been assessed as a Significant Major Beneficial effect within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**.
WR-FNM-004	Cumulative Effects, In-Combination Impacts	East Pye does not stand alone. Forncett Nature Matters identifies a series of solar, BESS, substation and transmission proposals affecting the Tas Valley and wider Norfolk, Suffolk and Essex and considers that piecemeal renewable energy proposals threaten to transform ancient rural communities into isolated pockets within an industrial energy landscape.	See the Applicant's response to FNM-005 in **The Applicants Response to Relevant** **Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** submitted into the Examination at Procedural Deadline A, in response to Forncett Nature Matters Relevant Representation, 1st September 2026; and WR-GMPC-004 in this document regarding cumulative effects. Further detail on the assessed cumulative effects for ecology and transport can be found in **ES Volume 1, Chapter 8 – Ecology and**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Forncett Nature Matters considers that the cumulative energy proposals involve loss of established trees, hedges, ditches and verges that are rich sources of biodiversity and carbon capture, while miles of well-used Public Rights of Way are also at risk.	**Biodiversity [APP-044]** and **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, which confirm that no significant adverse cumulative effects are anticipated.
WR-FNM-005	Consultation and Engagement	The sheer number and complexity of applications and consultations is described as exhausting. Forncett Nature Matters considers that many local people are effectively disenfranchised, particularly those least able to cope with online resources and intimidating face-to-face sessions, and notes that the Applicant required urging from the Examining Authority to make mapping and other information more accessible.	The Applicant's Community Relations team has been available to assist members of the public and organisations via a series of free-to-use communication channels (phone, post and email). Members of the public are welcome to use these channels to ask about the application documents, as well as how to access and read Scheme maps. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-003]**, which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents.
WR-FNM-006	Soils and Agriculture	Forncett Nature Matters states that the Applicant could not source sufficient land while retaining its preferred criteria of	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Site Selection, Alternatives and Design Evolution	avoiding high-quality food-producing land and environmentally sensitive land, and therefore changed the criteria. It considers this could take thousands of acres of productive land out of use, has serious implications for food security and demonstrates that the area cannot provide enough suitable land for a development of this scale.	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. Permanent loss of BMV land is limited to 28.9ha. Land not subject to permanent works will be returned to agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. The area of agricultural land in Norfolk is about 417,633ha, as set out in Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			National policy does not preclude development on BMV land. NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV quality land and that land type should be a predominating factor in determining the suitability of the site selection. NPS EN-3 recognises that, at scale, developments may use some agricultural land. ALC was an important factor for the Applicant in site selection. Land within the Order Limits was identified as likely to be some of the lowest quality land relative to the wider area based on Natural England's 'Predictive Likelihood of BMV' mapping. Non-BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the **Site Selection Assessment [APP-215]**, which considers potential for non-BMV alternative sites identified through desktop mapping to accommodate the Scheme.
WR-FNM-007	Soils and Agriculture Ecology and Biodiversity Water Environment	Research cited by Forncett Nature Matters reports changes to soils beneath ground-mounted solar panels, including compaction, reduced plant cover and changes in soil chemistry, with consequences for biodiversity and water run-off. It also notes the need for further research on the impacts of battery storage systems on soils.	NPS EN3 2025 sets out that solar farms have the potential to increase biodiversity values of sites which can result in significant wider environmental benefits and enchantments. Resting soils from intensive arable use has the potential for benefits to soil structure and health. Water run-off from PV panels will reach the ground under the Solar PV Arrays. PV panels come in sections and water drains down between these sections, not only at the lower edge. Soils will not be harmed during the operation

ID	Theme	Comments/Issues Raised	Applicant's Response
			and maintenance phase due to lack of moisture. Plate 15.53 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** shows the gap between sections of panels. Water and light are available under the panels and plant growth and cover is not adversely affected by the introduction of solar PV arrays, Plate 15.54 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** clearly shows that plant growth under panels is not adversely affected. The BESS is expected to be restorable back to a comparable ALC grade. Topsoils will be stripped and stored, in line with the detailed SRMP which is secured by Requirement 18 in the **Draft DCO [REP1-014]**. As explained in section 15.8.71 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** the soils within the BESS site are of low sensitivity, there is no permanent effect and the storage of the topsoils and, as required, subsoils will not result in any long-term loss of soil function.
WR-FNM-008	EIA Methodology Ecology and Biodiversity	Forncett Nature Matters considers that independent biodiversity evidence on ground-mounted solar development is difficult to obtain and raises concerns about potential conflicts of interest where research is commissioned by solar developers or undertaken by	The Applicant notes this comment. Technical assessments within the **ES [APP-042 to APP-056]** that support this DCO Application, particularly **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** consider the implications for biodiversity in relation to the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		organisations that derive significant income from the sector.	
WR-FNM-009	Ecology and Biodiversity	The proposed development area has a significant Barbastelle bat population. Forncett Nature Matters cites research reporting severe declines in bat activity around solar development and other research raising concerns about damaging impacts of extensive solar layouts on bat populations.	The Applicant acknowledges the presence of Barbastelle Bat colonies surrounding the Order Limits and has considered the core sustenance zone within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** The Scheme designs primarily utilise 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 disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within **Design Principles, Parameters and**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Commitments [REP1-078] and **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. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** have acknowledged the presence of Barbastelle bat maternity colonies locally and also

ID	Theme	Comments/Issues Raised	Applicant's Response
			referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. As a precautionary measure, the embedded design principles adopted and detailed within **Design Principles, Parameters and Commitments [REP1-078]** and **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]** include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing lo enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.

3.3 Great Moulton Action Group

Table 3.3 Applicant's Response to Great Moulton Action Group [REP1-447]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-GMAG-001	EIA Methodology Scheme Description	GMAG considers that many original concerns remain unresolved and are instead deferred to post-consent stages through future ground investigations, risk assessments, hydrogeological assessments, drainage design, BESS consequence modelling, emergency response planning, archaeological trenching and detailed design information. GMAG submits that the Applicant repeatedly asks the Examining Authority to conclude that impacts will be acceptable before the investigations and assessments required to understand those impacts have been completed.	The Applicant notes this comment. Detailed responses have been provided to each issue raised herein.
WR-GMAG-002	Ground Conditions Water Environment	The Applicant confirms that further ground investigations, hydrogeological assessment and quantitative risk assessment work will be undertaken after consent and following detailed design. GMAG considers that significant uncertainty therefore remains regarding groundwater behaviour, pollution	As detailed in earlier responses to Relevant Representations, the risks to human health and groundwater receptors have been assessed within **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**. The assessments presented in Chapter 16 and its appendices have been undertaken on a reasonable worst-case basis and in accordance with

ID	Theme	Comments/Issues Raised	Applicant's Response
		pathways and aquifer protection within this sensitive chalk groundwater environment.	the methodology agreed through EIA Scoping and consultation and has identified that with the inclusion of the embedded mitigation measures, the effects were Not Significant. The embedded mitigation measures, i.e., the further assessment works that will be undertaken (ground investigation and interpretative assessment of the investigation results, Foundation Works Risk Assessments and Hydrogeological Risk Assessments etc.) secured within the **Outline CEMP [REP1-058]** are for the purpose of informing the detailed design and will not change the results of the assessment of likely significant effects as the design will ensure that Significant adverse effects will not occur. On this basis, there is not considered to be "*significant uncertainty"* in the assessment of significant effects. The impacts on water receptors from potential contaminants for all phases of the Scheme have been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The baseline data available, in conjunction with the embedded mitigation measures described in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062],** are considered sufficient to assess that effects to human health, hydrology and hydrogeology from exposure

ID	Theme	Comments/Issues Raised	Applicant's Response
			to existing potential contamination through ground disturbance, and potential contamination arising from the Scheme are Not Significant. The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure and states that "*The results of the ground investigation will be used to inform the detailed design of the Scheme*". The ground investigation will include investigation of the geology and hydrogeology, allowing further assessment of the potential for any risks to Private Water Supplies and groundwater.
WR-GMAG-003	BESS Safety	GMAG notes that final consequence modelling, emergency response planning, spacing calculations and detailed risk assessments depend upon the final BESS design and will be completed later. It considers that the Examination is therefore being asked to accept conclusions regarding safety before the underlying evidence base has been finalised.	The Applicant's **Outline BSMP [REP1-066]** was prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). 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. The **Outline BSMP [REP1-066]** very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant has addressed specific BESS safety issues and how these are secured within the **Outline BSMP [REP1-066]** in its response to Great Moulton Action Group's relevant representation [RR-0705] in **The Applicant's Response to Relevant Representations - Part 3 [PDA-010]** under comment ID GMAG-250.
WR-GMAG-004	Landscape and Visual Lighting	GMAG remains concerned that operational lighting effects have not been properly assessed. It states that operational lighting will be required while the LVIA does not assess lighting effects, and that no detailed assessment has been provided of night-time visual effects, skyglow, cumulative lighting impacts or human health implications.	The potential effects associated with operational lighting have been considered through the development of **Environmental Statement Volume 3, Appendix 7.11 - Lighting Strategy [APP-151]**. Whilst lighting will be present, its operation will be limited to periods when the Sites are occupied. The selection, positioning, orientation and control of luminaires will take account of surrounding receptors and the wider night-time environment, with measures incorporated to minimise potential lighting effects. Given the limited and controlled nature of the proposed operational lighting, together with the measures established in the Lighting Strategy, significant residual lighting effects are not anticipated. The Applicant refers to its response to Q1.2.6 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** and the **Mental Health and Wellbeing Addendum**

ID	Theme	Comments/Issues Raised	Applicant's Response
			[REP1-107] submitted at Deadline 1, which further addresses lighting.
WR-GMAG-005	Human Health	GMAG considers that conclusions in the Human Health Summary Statement and Equality Impact Assessment cannot be regarded as fully robust where important technical work remains outstanding, including groundwater investigations, BESS safety assessments and lighting assessment.	The Applicant does not agree that the conclusions of the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]** are not robust. These assessments draw on the technical assessments submitted as part of the Environmental Statement and consider relevant health pathways including water quality, battery safety, lighting, noise, air quality, access, landscape and visual effects. The assessments were undertaken using the information available at the time of submission and take account of mitigation and management measures secured through the draft DCO and associated management plans. The Human Health Summary Statement contained within **ES Volume 1, Chapter 18, Other Environmental Matters [APP-054]** concludes that, taking account of embedded mitigation and management measures secured through the Scheme, no likely significant adverse effects on population health have been identified (see sections 18.6.250 to 18.6.266). The **Equality Impact Assessment [APP-214]** similarly concludes that

ID	Theme	Comments/Issues Raised	Applicant's Response
			significant negative equality impacts are unlikely (see section 9.1.6). The Applicant considers that the conclusions of these assessments remain robust and that no likely significant adverse effects on population health and wellbeing have been identified.
WR-GMAG-006	Policy compliance	GMAG considers that significant uncertainty remains regarding National Grid connection arrangements, groundwater, contamination, BESS safety, night-time lighting, archaeology and human health, and that the continuing reliance on post-consent assessment, future design work, investigations and management plans should attract substantial weight in the planning balance.	The Applicant notes this comment and refers to the responses provided above in relation to post-consent assessment and detailed design. The application incorporates all necessary powers to enable National Grid to deliver the new substation within the land under the Applicant's control, should National Grid accept the Applicant's proposed location, following National Grid's own siting works. Following the Connections Reform Process, if National Grid decide to site the substation in a different location, which is at their discretion, they would have to secure the necessary consents, rights and land interests to deliver the new substation.

3.4 Shotesham Action Group

Table 3.4 Applicant's Response to Shotesham Action Group [REP1-292]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SAG-001	Site Selection, Alternatives and Design Evolution Policy compliance	Shotesham Action Group considers that Site 8 should not have been chosen for solar panel development. It argues that the Applicant failed to give adequate weight at the site-selection and design stage to topography, the river valley location, landscape value, flooding, Little Wood SSSI and its Barbastelle bat maternity colony, public rights of way and nearby dwellings, and that Site 8 should be removed from the Order Limits.	The Applicant notes the matters raised by Shotesham Action Group. The Applicant has provided a comprehensive response to the 'East Pye Solar – Site 8, Shotesham – Landscape & Visual Matters Report' produced by Classic Landscape Architecture and submitted by Shotesham Parish Council. This response is provided within the **Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A [REP1-102]**.
WR-SAG-002	Site Selection, Alternatives and Design Evolution	The Action Group considers that alternative sites closer to the revised Point of Connection were not correctly assessed and that the comparative treatment of alternatives was not consistent, objective or transparent following the change in Point of Connection. It requests a revised, independent alternative site assessment.	The Applicant refers to the response is provided within the **Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A [REP1-102]** and to previous responses on alternatives and site selection provided within comment IDs GMAG-014, GMAG-023 to GMAG-034 of **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SAG-003	Landscape and Visual	Site 8 occupies land on the Tas Beck valley floor and adjoining sloping valley side within an open, tranquil and highly legible landscape. The Action Group's evidence concludes that development would cause major adverse and significant landscape effects and that 4.5m tracker panels on the elevated and sloping land would remain conspicuous from surrounding roads, properties and footpaths.	The Applicant notes the consultee comments. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views at Site 8. However, the Applicant's **LVIA [APP-043]** and associated appendices have informed the design evolution at Site 8 which has undergone extensive reduction in the amount of solar development to respond to its environmental constraints and avoid and reduce adverse effects. The **Green Infrastructure Strategy [REP1-013]** seeks to further reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through introduction of new landscape measures to support landscape integration and visual screening of the Scheme.
WR-SAG-004	Landscape and Visual	The Action Group considers that landscape planting and screening cannot overcome the fundamental harm at Site 8. Mitigation planting would itself erode valued open views and alter the character of the landscape and Public Rights of Way, while panels would remain visible from elevated and close-range viewpoints.	Sub-Site 8B has undergone considerable reduction in the extent of proposed solar development, with the northern and western parts of the Site excluding development from rising ground and areas of landscape which were more visually open. The southwestern portion of the Site is retained as it is considered with mitigation and reinforcement of existing hedgerow and tree belt features as shown on the **Green Infrastructure Strategy [REP1-013]** the solar development can be integrated and visibility of the development reduced in the longer term. It is noted however that this would result in a perceptible visual contrast for users of Sh-FP22 albeit it is

ID	Theme	Comments/Issues Raised	Applicant's Response
			considered this is a small part of the wider PRoW network which these users likely traverse in the locality.
WR-SAG-005	Public Rights of Way Landscape and Visual	Public Rights of Way 19 and 22, Boudicca's Way and other connected routes are valued for scenic countryside, tranquillity and open views. The Action Group considers that fencing, solar arrays, associated infrastructure and mitigation planting would enclose routes, remove panoramic views, reduce tranquillity and diminish the recreational and experiential quality of the countryside.	**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 these routes following mitigation establishment represents a perceptible contrast, resulting in a partial change to the view, which in accordance with the methodology does not result in a significant effect.
WR-SAG-006	Public Rights of Way Consultation and Engagement	The Action Group obtained more than 600 signatures from people who regularly use public footpaths south of Shotesham All Saints and object to the proposed solar development. Its analysis found that users came from Shotesham, surrounding villages, Norwich and beyond, demonstrating that the affected routes are a wider recreational resource.	The Applicant notes this comment and refers to its response provided at comment ID SAG-005 within **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-SAG-007	Water Environment	Shotesham Beck is described as highly sensitive to flash flooding, with the lower part of Site 8a and Market Lane in Flood Zones 2 and 3 and a history of significant flood events. The Action Group considers	The Applicant refers to its response to SAG-006 in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		that clay soils, steep slopes and panel drip lines could increase run-off and exacerbate flooding at Market Lane, Shotesham village and Shotesham Common SSSI.	
WR-SAG-008	Water Environment	The Action Group considers that the Applicant has underestimated impermeable area and has not adequately investigated ground conditions or the viability of infiltration. It argues that increased run-off, sediment and contaminants from solar fields could damage Shotesham Beck and Shotesham Common SSSI.	The Applicant refers to its response to SAG-008 in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** (refs. SAG-008). The Applicant will be undertaking ground investigations including infiltration testing at targeted locations across the Order Limits during the Examination Period.
WR-SAG-009	Water Environment	The Action Group considers that the private water supply baseline is unsound. It states that only three boreholes are shown within 250m of Sites 8a and 8b whereas there are ten borehole supplies serving twelve properties, and that these supplies have not been adequately assessed. The private water supply serving Market Lane Farm lies within a groundwater recharge area and Source Protection Zone. The Action Group considers that the Applicant failed to identify Site 8 as	In relation to the locations of Private Water Supplies (PWS) identified within 250m of sub-Sites 8a and 8b and the potential for mobilisation of existing contamination in the ground, the Applicant refers to its response to SPC-088 in **The Applicant Response to Relevant Representations Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011]**. As described in Section 3.4.8 of **ES Volume 1, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** it is recognised that all of sub-Sites 8a and 8b are within a groundwater Source Protection Zone (SPZ) 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		being within a Source Protection Zone and that construction, operation and increased flooding could create contamination pathways.	The Scheme will incorporate appropriate flood risk and pollution management mitigation as set out and secured within management plans and the **Design Principles, Parameters and Commitments [REP1-078]** to ensure that there will be no increase in flood risk within the Order Limits or elsewhere.
WR-SAG-010	Policy compliance Landscape and Visual	The Action Group considers that South Norfolk Council's Landscape Susceptibility in Relation to Energy Generation, Storage and Transmission SPD should form part of the assessment and that the Applicant did not adequately consider it in the DCO application.	The Applicant notes the comment. The Applicant is aware of the document however it was published at the time the Application was made and therefore only the draft version was available to inform **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices. At the time of drafting the SPD excluded NSIP scale solar development. In general, the Applicant has identified the following key differences of professional opinions with the SPD: - The SPD does not address the reversibility of solar PV development. Given that solar panels are removable and the land can be restored, the susceptibility of the landscape for solar PV development is inflated in general. - The SPD appears to overstate the susceptibility of arable fields, despite categorising them as medium in its own criteria. It also fails to consider the potential

ID	Theme	Comments/Issues Raised	Applicant's Response
			for landcover restoration following decommissioning. - Solar PV development involves a change in land use, but it remains broadly consistent with the baseline productive landscape. The solar PV development does not affect settlement patterns. - Although large-scale solar PV developments may be visible, their low height results in minimal impact on landscape openness. Views containing solar panels could still be perceived as open in character. - The perceived impact on landscape intactness is largely perceptual. Solar PV development has limited effect on landcover and field pattern and thus does not materially compromise the integrity of the landscape.
WR-SAG-011	Landscape and Visual Human Health	The Action Group considers that the Applicant's Residential Visual Amenity Assessment is too narrowly limited to properties within 100m and should extend to 250m. It identifies properties on Baxter's Lane and Market Lane within 200m of Site 8b that would experience substantial visual effects.	The Applicant refers its response provided under Q1.11.1 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.
WR-SAG-012	Ecology and Biodiversity	The Scheme lies within a nationally important Barbastelle bat landscape, with a maternity colony at Shotesham Little	The Applicant refers to its response to WR-FNM-009 in Table 3.2 of this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Wood SSSI and multiple maternity colony Core Sustenance Zones overlapping the wider Scheme area. The Action Group considers that the Applicant has not demonstrated that favourable conservation status would be maintained.	
WR-SAG-013	Ecology and Biodiversity	Sites 8a and 8b form part of a wider ecological network close to Shotesham Beck, the River Tas chalk stream and Little Wood SSSI. The Action Group raises potential effects on hedgerows and field margins, brown hares, deer, barn owls, farmland birds and other wildlife, and considers that the proposed planting and grassland would not compensate for the biodiversity loss.	Impacts to Ecology and Biodiversity have been avoided by the inclusion of embedded mitigation as set out in Section 8 of the **Outline CEMP [REP1-058]**, and an **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050]** both of which will be adhered to prior to and during construction. Methods include the establishment of buffer zones between protected sites, priority and important habitats and important ecological features, including ancient trees, woodland, hedgerows, watercourses and ponds; pollution controls and refuelling and chemical storage requirements; a surface water management plan, the employment of an ECoW, and the delivery of toolbox talks. The operation of the Scheme will mitigate impacts to habitats and species through the **Outline LEMP [REP1-064]** which will include enhancement measures for habitats including planting, seeding; better management and monitoring as well as the

ID	Theme	Comments/Issues Raised	Applicant's Response
			erection of bat boxes all which will serve to improve habitat networks.
WR-SAG-014	Transport and Access	The Action Group considers the proposed construction routes unsuitable for HGV traffic. Shotesham Road, Woodton Road and Baxter's Lane are narrow single-track roads in poor condition, and construction traffic would create risks for other vehicles, cyclists, pedestrians and horse riders.	The Applicant acknowledges the concerns raised regarding the suitability of Shotesham Road, Woodton Road and Baxter's Lane for construction traffic. The suitability of these routes informed the development of the construction traffic strategy and associated mitigation measures. Vehicle tracking assessments were undertaken to demonstrate that the proposed vehicle types could safely access the relevant parts of the Scheme using the proposed routes. Vehicle tracking drawings submitted at Deadline 1 (Appendix A of **Applicant's Response to Procedural Deadline A and Additional Submissions [REP1-103]** (333101678-STN-HGN-SW-DR-H-5507-P01, 333101678-STN-HGN-SW-DR-H-5506-P01 and 333101678-STN-HGN-SW-DR-H-5505-P01)) demonstrate that 10m, 12m and 16.5m vehicles can safely negotiate the locations assessed and informed the development of the proposed construction traffic strategy. The effects of construction traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement (2023). This assessment included consideration of the sensitivity

ID	Theme	Comments/Issues Raised	Applicant's Response
			of highway links and the presence of vulnerable road users, including pedestrians, cyclists and equestrians, where relevant. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to minimise impacts on local roads and other users of the highway network.
WR-SAG-015	Transport and Access Landscape and Visual	The proposed internal haul-road access from Site 8b to Site 8a is considered impracticable because of the steep gradient towards Market Lane and the major works required to cross Shotesham Beck. The Action Group considers that these works would permanently damage the existing bridge/ford and surrounding rural landscape.	The Applicant acknowledges the concerns raised regarding the proposed internal haul route between Sites 8A and 8B. The Applicant is aware of the existing topography and gradients between the Sites and has utilised topographical survey data to inform the design and development of the Scheme. The Applicant does not agree that the proposed internal haul route is impracticable. The internal haul route forms part of the proposed construction strategy for Sites 8A and 8B and reduces the extent to which construction traffic would need to travel on Market Lane. Consequently, vehicle movements between Sites 8A and 8B would be limited to a more restricted section of Market Lane, between Access 49 serving Site 8A and Access 50 serving Site 8B, where required. The existing culvert over Shotesham Beck currently accommodates standard vehicles including heavy

ID	Theme	Comments/Issues Raised	Applicant's Response
			goods vehicles so no damage to the structure is anticipated from use by construction vehicles. Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures intended to minimise impacts on local roads and other users of the highway network.
WR-SAG-016	Landscape and Visual	The Action Group considers that the dispersed 12-mile footprint places industrial infrastructure across multiple parishes, conservation areas and heritage settings, creating a cumulative industrialisation of the historic landscape. It identifies potential effects on conservation areas including Brooke, Saxlingham Green, Fritton, Seething, Shotesham, Hempnall and Wacton.	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. **ES Volume 1 Chapter 10 Cultural Heritage [APP-046]** specifically considers the historic environment.
WR-SAG-017	Cultural Heritage	The Action Group relies on an independent Heritage Impact Assessment which identifies less-than-substantial harm to 36 designated assets, compared with the Applicant's identification of harm to two designated assets. It considers that the Applicant places insufficient weight on open agricultural setting, isolation, settlement approaches, historic land relationships and group value.	The Applicant refers to its response provided to Shotesham Action Group's relevant representation [RR-1768] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment IDs SAG-002, SAG-004, SAG-012, SAG-022, SAG-023, SAG-025, and SAG-026.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SAG-018	Glint and Glare	The Action Group considers that 4.5m tracker panels on Sites 8a and 8b would cause significant glint and glare because topography limits screening. It identifies potential effects on properties around Baxter's Lane, Wash Lane and Market Lane, road users, Boudicca's Way and Public Rights of Way 19 and 22.	The Applicant refers to its responses SAG-027 to SAG-030 provided to Shotesham Action Group's relevant representation [RR-1768] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-SAG-019	Noise and Vibration	The Action Group considers that inverter and tracker-motor noise would adversely affect the exceptionally quiet Site 8 area. It disputes the Applicant's conclusion that operational rating levels would be at or below background noise and notes that calculated early-morning equipment noise exceeds the stated background level before allowing for assessment uncertainty.	The Applicant acknowledges that Site 8 is characterised by low background sound levels and that this is an important consideration in the assessment. The assessment presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, supported by **ES Volume 3, Appendix 12.1 – Baseline Sound Survey Report [APP-178]** and **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**, considered the early-morning period from 04:00 to 07:00. This period accounts for the potential operation of solar equipment under particularly quiet conditions and was assessed using the BS 4142:2014+A1:2019 night-time methodology. The ES assessment predicted no exceedance of the selected background sound levels at the assessed Site 8 receptors during the early-morning period. The larger calculated early-morning exceedances identified in the ES occur at receptors closer to the

ID	Theme	Comments/Issues Raised	Applicant's Response
			BESS site, rather than at receptors associated with Site 8. There is no BESS proposed at Site 8, where the relevant operational sources principally comprise solar infrastructure, including inverters and tracker motors. Following submission of the ES, the Applicant prepared the **Evening Noise Assessment [REP1-101]** to provide a separate assessment of the period from 19:00 to 23:00, including circumstances in which residents may use outdoor amenity areas. This supplementary assessment used evening background sound levels derived from the existing environmental sound survey data and did not replace the reasonable worst-case assessment presented in the ES. The supplementary evening assessment identified a marginal exceedance at one Site 8 receptor. At NSR59, the calculated rating level is 21 dB $L_{Ar,1hour}$ against a selected background sound level of 20 dB $L_{A90,15minutes}$, representing a difference of 1 dB. At the other assessed Site 8 receptors, the calculated rating levels are equal to or below the selected evening background sound levels. The absolute rating levels across the assessed Site 8 receptors are very low, ranging from 15 to 22 dB $L_{Ar,1hour}$. **Evening Noise Assessment [REP1-101]**, Table 1.13.

ID	Theme	Comments/Issues Raised	Applicant's Response
			In accordance with BS 4142:2014+A1:2019, the assessment considers the numerical difference between the rating and background sound levels alongside the absolute sound level and the acoustic context. This is particularly relevant where both the background and rating levels are low. The marginal evening exceedance at NSR59 was considered in that context and does not alter the conclusion that there would be no significant operational noise effect at Site 8. The Applicant therefore considers that the quiet acoustic environment around Site 8 has been appropriately assessed. The ES predicted no early-morning exceedances at the assessed Site 8 receptors. The subsequent evening assessment identified only a marginal 1 dB exceedance at one receptor, at a very low absolute rating level, and did not change the conclusions of the ES.
WR-SAG-020	Human Health	The Action Group considers that communities would experience effects from countryside loss, changes to views, reduced property saleability, impacts on leisure activity, flood risk, wildlife loss, noise, traffic, community disagreement and uncertainty. It asks that mental-health effects on rural communities are given weight in the decision.	The Applicant acknowledges the concerns raised regarding the potential effects of countryside loss, changes to views, recreation, noise, traffic, flood risk, wildlife and uncertainty on mental health and wellbeing. These matters have been considered within the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Assessment [APP-214]. The assessments consider the potential effects of landscape and visual change, transport and access, noise, air quality, recreation, socio-economic effects, access to nature, place attachment, community connectivity and perceived environmental change on physical, mental and social wellbeing. The assessments recognise that some individuals may experience anxiety, concern or distress in response to environmental change and uncertainty, and that certain groups may be more sensitive to these effects (see table 8.2: Construction Phase-Mental Health related equality effects of Equalities Impact Assessment and section 18.6.26 of Human Health Summary Statement). However, taking account of embedded mitigation and management measures, neither assessment identifies likely significant adverse effects on population health or mental wellbeing. In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of mental health and wellbeing pathways, including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects, and supports the conclusions of the Human Health Summary

ID	Theme	Comments/Issues Raised	Applicant's Response
			Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**. The Applicant therefore considers that mental health and wellbeing effects have been appropriately assessed and given due weight in the assessment process.
WR-SAG-021	Landscape and Visual	The Action Group considers that the proposed substations would add materially to the industrialisation of South Norfolk. It raises particular concern about the National Grid and 400kV substation infrastructure proposed close to residential properties at Great Moulton and states that the revised National Grid substation location was not subject to proper consultation.	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 including the substations. The assessments within the ES consider the effects of the Scheme as a whole rather than individual elements in isolation. The Applicant considers that the various rounds of consultation and community engagement has been undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. At both non-statutory and statutory consultation, the Applicant held events within the Core Consultation Zone (presented in Chapter 7 of the Consultation

ID	Theme	Comments/Issues Raised	Applicant's Response
			Report [APP-024]) where members of the community had the opportunity to meet with the Applicant's team and view and takeaway consultation materials. In addition, the Applicant has met with and provided with responses to individuals and community groups throughout the pre-application process. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-003]**, which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents. During design evolution, the Project Substation located in Sub-Site 1B was upgraded from a 132kV to 400kV Project Substation. This change was consulted on during the Targeted Consultation in Autumn 2025. Further details of the Targeted Consultation can be found in the **Consultation Report [APP-024]** and **Consultation Report**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Appendix 9: Targeted Consultation Materials [APP-033].
WR-SAG-022	Soils and Agriculture Site Selection, Alternatives and Design Evolution	The Action Group considers Site 8 highly likely to comprise Best and Most Versatile agricultural land and questions the robustness and independence of the Applicant's final agricultural land classification where the assessment was informed by discussions with the landowner. It considers agricultural land quality should have carried greater weight in site selection.	Site 8A and 8B have been found to mostly be of Subgrade 3b quality with small areas of Grade 2 and Subgrade 3a found, the results can be found in **ES Volume 3, Appendix 15.1- Agricultural Land Classification [APP-182]**. The land quality has been determined in accordance the ALC guidelines (revised December 2025). Discussions with the landowners does not inform the ALC survey. The discussions allow for an assessment on farm impacts, and these are assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The land graded as Subgrade 3b is limited by wetness, whilst the land graded as Grade 2 and Subgrade 3a have a lesser limitation due to wetness. ALC grading is determined by the most limiting factor, based on samples on a regular 100 metre grid pattern, as described in the ALC.
WR-SAG-023	Cumulative Effects, In-Combination Impacts	The Action Group considers that the cumulative effects of the wider Scheme on landscape character, settlement setting, the Public Rights of Way network, agricultural land and ecological resources are materially greater than suggested in	A detailed landscape and visual assessment is included in **ES Volume 1, Chapter 7 -Landscape and Visual [APP-043],** including consideration of cumulative effects. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations

ID	Theme	Comments/Issues Raised	Applicant's Response
		the Environmental Statement and reinforce the unsuitability of Site 8.	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.
WR-SAG-024	Concluding remarks Policy compliance	The Action Group concludes that Site 8 is highly sensitive, highly constrained and incapable of accommodating the proposed development without significant and unacceptable harm, and requests that Site 8 be removed from the Order Limits if the East Pye Solar Project proceeds.	The Applicant notes this comment and refers to response provided above and to its response to Shotesham Action Group under SAG-003 in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** with regards to the removal of Site 8 from the Scheme.

3.5 Norfolk Wildlife Trust

Table 3.5 Applicant's Response to Norfolk Wildlife Trust [REP1-404]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NWT-001	Introductory remarks	**Introduction** Significant amendments and assurances are required before the principle of this development is acceptable so that adequate safeguards are secured to ensure that impacts on wildlife, habitats, ecological networks and protected species are fully avoided, mitigated or compensated. Norfolk Wildlife Trust (NWT, Registered charity no. 208734) supports the urgent transition to renewable energy generation and recognise the important contribution that solar energy will make towards achieving net-zero carbon targets. However, the climate and nature crises must be addressed in parallel. Renewable energy infrastructure should be designed and delivered in a way that avoids, minimises and mitigates adverse effects on biodiversity and contributes positively to nature recovery.	The Applicant notes Norfolk Wildlife Trust's interests in the ecological impacts of the Scheme. The Applicant continues to engage with Norfolk Wildlife Trust, including through a Statement of Common Ground submitted at Deadline 1 **[REP1-088]**. The Applicant has provided responses to Norfolk Wildlife Trust's areas of concern in this table.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Our comments focus on areas where further clarification, stronger commitments or additional mitigation may be necessary to provide confidence that ecological impacts can be effectively managed throughout the lifetime of the scheme. Whilst the Applicant concludes that there will be no significant adverse residual ecological effects following mitigation, we consider that several important ecological matters require detailed scrutiny during Examination.	
WR-NWT-002	Ecology and Biodiversity	**Summary of Key Issues** We consider that the following matters require particular critical attention: • Ensuring that impacts on County Wildlife Sites (CWS) and other areas of ecological importance are fully avoided and appropriately buffered. • Protecting habitat connectivity and ecological networks, particularly those used by bats and other mobile species. • Demonstrating that lighting, construction activity and	The Applicant notes these matters and has provided responses below.

ID	Theme	Comments/Issues Raised	Applicant's Response
		operational infrastructure will not adversely affect protected species. • Providing greater certainty regarding the implementation and long-term effectiveness of mitigation and management measures. • Securing biodiversity enhancements and Biodiversity Net Gain outcomes through robust monitoring, management and adaptive interventions.	
WR-NWT-003	Ecology and Biodiversity	**County Wildlife Sites and Ecological Networks** County Wildlife Sites represent an essential component of Norfolk's ecological network and often provide important habitat for priority species outside nationally designated sites. As outlined in paragraph 8.6.7 (ES Chap 8), the Order Limits include parts of two CWSs; Lower Spring Wood CWS (within CR9), and Fritton Grange Meadows CWS (within CR7), and are adjacent/in the immediate vicinity of several others. The Order Limits also include or adjoin several Roadside Nature Reserves (RNRs),	The Applicant notes this comment and refers to its response to Norfolk Wildlife Trust under NWT-009 in **The Applicant's Response to Relevant Representations Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		including Bussey's Loke RNR (Sub- Site 7G), Market Lane RNR (Sub-Site 8A), Parkers Lane RNR (Area 1) (CRC4), and Parkers Lane RNR (Area 2) (CRC4). Both direct and indirect impacts on wildlife sites and associated habitat networks must be avoided.	
WR-NWT-004	Ecology and Biodiversity	**Potential impacts on Fritton Grange Meadows CWS** • This includes an area of lowland fen habitat within the cable route corridor. Lowland fen is an irreplaceable habitat and is highly sensitive to hydrological change, groundwater disturbance, compaction and pollution. It is stated that Horizontal Directional Drilling (HDD) will be used and the Outline CEMP includes design measures to reduce impacts through run-off control, pollution prevention and dust control during construction and specifies Stand-off distances of 30m from the CWS, which we welcome. • However, section 4.4 of the Outline Cable Route Construction Statement states that the	The Applicant notes this comment and refers to its response to Norfolk Wildlife Trust under NWT-009 and NWT 010 in **The Applicant's Response to Relevant Representations Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**. The Conceptual Site Model presented in **ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184]** will be refined through ground investigation. The **Outline CEMP [REP1-058]** includes commitments to undertake ground investigation and states that "*The results of the ground investigation will be used to inform the detailed design of the Scheme*". This includes the design of the trenchless crossing in CRC7, beneath Fritton Grange Meadows CWS. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in **ES Volume 1, Chapter 16 Ground Conditions [APP-052]** "*As discussed at a meeting*

ID	Theme	Comments/Issues Raised	Applicant's Response
		technology used for the HDD will be determined by feasibility studies carried out at each crossing during the detailed design stage and in accordance with a method statement. The Outline CEMP also states that a Hydrogeological Risk Assessment will be undertaken, "if required". Although the applicant states that HDD will pass beneath the fen at a depth of at least 5m, insufficient evidence has been provided to demonstrate that construction activities will not affect groundwater conditions or the hydrological processes upon which the fen depends. The applicant has also stated that a Water Management Plan will form part of a detailed CEMP and will include details of pre-construction, construction, and post-construction water quality monitoring. Further details are required to allow proper scrutiny. • The oCEMP confirms that the precise locations of HDD entry and exit points will only be determined	*with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent*". Furthermore, as described in the **Outline CEMP [REP1-058]** where trenchless crossings interact with Principal or Secondary Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required. It is noted that "*if required*" has been stated as if groundwater is not encountered at the proposed depth of a crossing, then hydrogeological risk assessment may not be necessary.

ID	Theme	Comments/Issues Raised	Applicant's Response
		at the detailed design stage. Without this information it is not possible to fully assess the ecological impacts or determine whether the proposed buffer distances are sufficient. HDD entry and exit locations should be identified prior to examination close.	
WR-NWT-005	Ecology and Biodiversity	**Potential impacts on Spring Wood CWS** • We have previously recommended that Site 3 is dropped from the site selection due to potential impacts on the CWS/ancient woodland/bats. While we welcome some of the changes that have been made, we remain concerned about potential impacts of work in this area. Sheet 11 (of 13) of the Green Infrastructure strategy outlines the plans for the area. Although there is some native scrub planting for nature conservation and biodiversity, most of the measures are proposed for visual screening. We would particularly recommend revisiting	The Applicant notes this comment and refers to its response to Norfolk Wildlife Trust under NWT-010 in **The Applicant's Response to Relevant Representations Part 2 – Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the detailed plans for the buffer areas around the CWS, which are currently allocated for a tussocky grass mix. Ecotones should be allowed to establish around existing woodland. This would include allowing woodlands to spread laterally and naturally through wide buffer strips that are not planted.	
WR-NWT-006	Ecology and Biodiversity	**Retention and protection of mature hedgerows, woodland edges and field margins** • The Environmental Statement identifies partial removal of 32 hedgerows (we are unclear of the exact length), removal of five trees; and temporary removal of sections of hedgerow for cable installation and access. Many hedgerows in this landscape are historic features that perform important ecological functions and provide connectivity between designated sites and woodland habitats. We request confirmation that no ancient or species-rich hedgerows will be removed, even temporarily, additional safeguards for veteran	The Applicant notes this comment and refers to its response to Norfolk Wildlife Trust under NWT-019 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		hedgerows, detailed restoration specifications and monitoring requirements for all temporary removals.	
WR-NWT-007	Ecology and Biodiversity	**Impacts on road-side verges** • The ES acknowledges that access to sites may require temporary reductions to overgrown hedgerows and tree canopies adjacent to roads. We welcome the statement that no other activities are proposed within Roadside Nature Reserve (RNR) boundaries, however this does not fully address impacts to verges outside designated RNRs. This is an area of high importance for rare botany but the application does not provide a comprehensive assessment of construction impacts on roadside verge habitats across the transport network. Further botanical surveys are required to understand the baseline and to avoid harm, especially in the areas proposed for transport, haul roads, or road widening.	The Applicant notes this comment and refers to its response to Norfolk Wildlife Trust regarding road-side verges under NWT-011 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• Even where no direct habitat removal is proposed, repeated use by construction traffic can degrade species-rich verge vegetation. This is particularly true for Abnormal Indivisible Loads (AILs). • The Examination should establish the extent of any verge loss, disturbance, compaction or vegetation clearance associated with construction activities and ensure that appropriate avoidance, protection, reinstatement and monitoring measures are secured through the DCO.	
WR-NWT-008	Ecology and Biodiversity	**Bats** Bats remain a principal ecological consideration. The Applicant's own assessment concludes that the Order Limits and surrounding landscape support a "nationally important assemblage of foraging and commuting bats". The ES records eleven bat species within the Order Limits including barbastelle, which the Applicant identifies as "the rarest bat in the UK". The site lies within a landscape containing mature hedgerows, tree belts, woodland blocks and other	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding bats under NWT-012, NWT-013 and NWT-014 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		linear habitat features that are likely to function as important commuting and foraging routes. We welcome the retention of many of these features and the applicant's recognition of their ecological importance. Nevertheless, we consider that further assurance is required to demonstrate that bat populations will not experience a loss of ecological connectivity as a result of the development. For many bat species, the value of a hedgerow or tree line lies not simply in its physical presence but in its ability to function as a connected movement corridor. Particular care should be taken to ensure: • Sufficient stand-off distances between solar infrastructure and key commuting features. • Retention of continuous dark corridors through and around the site. • Protection of mature trees and associated flight lines.	

ID	Theme	Comments/Issues Raised	Applicant's Response
		• Provision of habitat enhancements that strengthen rather than merely maintain existing connectivity. Where ecological corridors are relied upon as mitigation, management prescriptions and monitoring arrangements must be sufficiently detailed to demonstrate that they will remain functional throughout the operational life of the scheme.	
WR-NWT-009	Ecology and Biodiversity	The Environmental Statement (paragraph 8.9.607) concludes that temporary hedgerow gaps of up to 10m would not significantly affect bat movement. NWT does not agree that this conclusion is sufficiently evidenced. For barbastelle bats in particular, even relatively small breaks in linear features can reduce permeability of commuting routes and alter movement patterns and even relatively small interruptions to linear habitat features can affect commuting behaviour and habitat use. The Applicant relies substantially on retention of existing hedgerows and habitat corridors to maintain connectivity. Sufficient buffers must be secured around important commuting routes.	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding bats under NWT-012, NWT-013 and NWT-014 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Habitat creation cannot automatically replace established commuting routes and mature landscape features which may take decades to achieve equivalent ecological function. Given the presence of a nationally important bat assemblage and records of barbastelle, NWT considers that a precautionary approach is required.	
WR-NWT-010	Ecology and Biodiversity	**Lighting** We welcome the applicant's commitment to minimising operational lighting as this is a key component of ecological mitigation. However, lighting remains a potentially significant issue for bats and other nocturnal wildlife, particularly during construction. We recommend that: • All lighting follows a strict "dark skies" approach. • Detailed lighting design is informed by ecological sensitivity mapping. • Lux thresholds are established for key commuting corridors. • Monitoring is undertaken where lighting-sensitive bat activity is identified.	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding lighting impacts under NWT-013, NWT-017 and NWT-018 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• Temporary construction lighting is subject to the same ecological controls as permanent infrastructure. Securing these measures would provide greater confidence that important bat flight routes remain functionally dark.	
WR-NWT-011	Ecology and Biodiversity	Construction activity represents the period during which ecological risks are likely to be greatest. Effective delivery of the CEMP and associated ecological controls will depend upon the detail and enforceability of these measures. Particular attention should be given to timing restrictions for vegetation clearance, protection of retained habitats during construction, ecological supervision of sensitive works, clear procedures for protected species encounters, biosecurity and invasive species controls, and monitoring and reporting requirements. Adaptive management provisions should also be included so that additional mitigation can be implemented promptly if unexpected ecological effects are identified.	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding construction activity under NWT-010 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NWT-012	Ecology and Biodiversity	**Biodiversity Net Gain and Habitat Enhancement** We strongly support the objective of delivering measurable biodiversity gains alongside renewable energy infrastructure. The extensive operational lifespan of the development has the potential to provide significant biodiversity benefits if habitats are established and managed appropriately. We would welcome greater detail regarding management objectives, performance indicators and contingency measures should habitat creation fail to achieve the anticipated outcomes. Predicted biodiversity gains may rely heavily upon future habitat condition improvements which can be difficult to secure in practice without robust monitoring and intervention mechanisms.	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding biodiversity net gain under NWT-025, NWT-026 and NWT-027 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**. In addition, the Applicant has committed, via Requirement 9 of the **Draft DCO [REP1-014]** to the following BNG percentages updated at Deadline 1: • +30% Habitat Units • +25% Hedgerow Units • +10% Watercourse Units These figures are lower than the figures the Scheme is anticipated to deliver as reported in the **Biodiversity Net Gain Assessment Report [APP-218]**. However, this is in order to retain design flexibility and account for any adjustments as a result of detailed design changes, and also to account for any potential future changes to either the published Statutory Metric or the application of BNG which may affect the figures at the detailed design stage.
WR-NWT-013	Ecology and Biodiversity	**Farmland birds and open countryside species**	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding farmland birds and open countryside species under

ID	Theme	Comments/Issues Raised	Applicant's Response
		The assessment may understate impacts upon farmland bird assemblages associated with the extensive conversion of agricultural land to solar infrastructure. The Scheme would introduce extensive panel arrays, perimeter fencing, inverter stations, substations, internal access tracks and associated infrastructure across a large rural landscape. This may result in displacement effects, loss of functional foraging habitat, loss of breeding habitat, impacts on wintering bird assemblages, long-term habitat management requirements. Monitoring arrangements and trigger mechanisms should predicted outcomes not be achieved.	NWT-021 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.
WR-NWT-014	Ecology and Biodiversity	**Landscape Environmental Management Plan (LEMP)** The Outline LEMP contains a relatively comprehensive package of habitat creation and management measures. However, we have concerns regarding whether it will deliver genuine biodiversity enhancement, adequately compensate for habitat fragmentation, and provide sufficient certainty that impacts on wildlife, ecological networks and protected sites	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding the **OLEMP [REP1-064]** and mitigation measures under NWT-008, NWT-015 and NWT-016 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		will be mitigated over the operational life of the scheme. Many measures remain indicative (ie species mixes, habitat locations, management prescriptions, monitoring details) will be determined later and are deferred to later detailed design, limiting confidence in outcomes. A recurring issue throughout the document is that many proposed woodland belts, hedgerows and tree belts are justified primarily for visual screening, glint and glare mitigation and landscape integration. This creates a risk that habitat design will be driven by landscape objectives rather than ecological function. Instead many habitat measures appear to be perimeter screening planting around solar infrastructure. A significant weaknesses is the repeated targeting of only "Moderate" condition habitat. For a development of this size and one promoting substantial BNG gains, this is not ambitious enough. We request that habitat condition targets are raised from Moderate to Good where feasible.	
WR-NWT-015	Ecology and Biodiversity	**Insufficient Evidence base**	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding white

ID	Theme	Comments/Issues Raised	Applicant's Response
		We have concerns that currently gaps in the evidence base mean the Examining Authority lacks enough ecological evidence to be confident that impacts on the River Tas, white-clawed crayfish, non-ancient/non-veteran trees and associated habitats have been properly assessed and can be effectively mitigated. We note that other parties have drawn attention to this. We understand that The Planning Inspectorate and Environment Agency previously requested further crayfish surveys, but these were not undertaken. This means that the examination is proceeding before the ecological evidence base is settled and that the Applicant has not demonstrated compliance with the precautionary principle. There is insufficient confidence that all ecologically valuable trees and hedgerow features have been properly identified, in particular veteran coppice stools, ancient hedgerow trees and root systems that may be overlooked by current surveys.	clawed crayfish and environmental surveys under NWT-022 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**. The Applicant does not agree that the Examining Authority requested further white-clawed crayfish surveys that the Applicant then failed to undertake. The **Rule 6 Letter [PD-005]** requested further information and an update on any additional surveys carried out or proposed but expressly allowed additional survey work not to be undertaken where robust justification and further relevant evidence were provided. The Applicant supplied that justification in the **Applicant's Position Statement on White-Clawed Crayfish [PDA-007]**, which concludes that the existing ecological baseline is adequate and explains why additional surveys were not considered necessary. Precautionary avoidance, biosecurity, pollution prevention and sediment control measures are nevertheless secured through the Scheme. The Applicant therefore does not agree that the evidence base is unsettled or that the precautionary approach has not been applied.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NWT-016	Ecology and Biodiversity	**Long-Term Management and Monitoring** A recurring theme across the ecological mitigation package is the reliance on future management plans and detailed design stages. It is imperative that these future documents are supported by sufficiently robust commitments within the consent framework. To provide confidence in delivery, there must be clearly defined ecological objectives, measurable success criteria, independent monitoring arrangements, regular reporting to the relevant authorities and agreed trigger mechanisms for remedial action where ecological outcomes are not being achieved. Long-term monitoring is particularly important given the scale and duration of the development. Considering the significant complexities involved in ensuring the mitigation and compensation habitats proposed for this scheme meet the required outcomes, we want to see an Ecological Stakeholder group set up, to advise on the scheme's design and ongoing management of ecological areas and be reactive to	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding monitoring and management under NWT-30 and NWT-031 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		monitoring data and difficulties in habitat establishment on site.	
WR-NWT-017	Ecology and Biodiversity	**Cumulative effects** Cumulative ecological effects can be dismissed lightly. Norfolk is currently experiencing increasing pressure from major energy, grid and infrastructure proposals. Whilst individual projects may conclude that impacts are limited, cumulative effects may arise through progressive loss of farmland habitat, fragmentation of ecological networks, degradation of bat commuting landscapes, pressures upon protected species populations and reduction in landscape-scale habitat permeability. We consider that cumulative effects on bats are of particular importance given the Applicant's identification of a nationally important assemblage and the dependence of many species upon extensive connected landscapes.	The Applicant notes these comments and refers to its response to Norfolk Wildlife Trust regarding cumulative effects under NWT-028 in **The Applicant's Response to Relevant Representations Part 2 [PDA-009]**.
WR-NWT-018	Ecology and Biodiversity	**Conclusion** The acceptability of the East Pye Solar Farm proposal will depend upon demonstrating that ecological	The Applicant notes these comments and refers to its responses provided to Norfolk Wildlife Trust in this table and in Table 2.10 in **The Applicant's Response to Relevant Representations Part 2 - Statutory Bodies, Undertakers and Notable**

ID	Theme	Comments/Issues Raised	Applicant's Response
		impacts, particularly those affecting County Wildlife Sites, habitat connectivity and protected species such as bats, can be effectively avoided and mitigated through detailed and enforceable measures. We therefore ask the Examining Authority to ensure that robust requirements and management commitments are secured in relation to: • Protection of County Wildlife Sites and ecological networks. • Maintenance of habitat connectivity for bats and other wildlife. • Strict controls on lighting during both construction and operation. • Delivery and monitoring of biodiversity enhancement measures. • Long-term ecological management with clear success criteria and adaptive management provisions.	**Parties with whom the Applicant is Seeking a Statement of Common Ground [PDA-009]**.

4 The Applicant's Response to Deadline 1 Submissions from Elected Representatives

4.1 Adrian Ramsay MP

Table 4.1 Applicant's Response to Adrian Ramsay MP [REP1-184]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-AR-001	Aviation	**Tibenham Airfield** I was asked to provide further information on take-off and landing concerns at Tibenham Airfield by deadline 1. I refer you to the submission from Norfolk Gliding Club which provides this information. I was first contacted by the Safeguarding Officer at the Norfolk Gliding Club based at Tibenham Airfield in June 2025. The club was concerned about the combined effect of the Norwich to Tilbury pylon route and two separate solar schemes on the safety of its members, if the schemes were to go ahead. I request that all safety information is considered with the utmost care.	The Applicant continues to engage with Norfolk Gliding Club (NGC), who operate from Tibenham Airfield, regarding the impact upon their safeguarding concerns. Further comments and issues were discussed at a meeting with Norfolk Gliding Club on 14/10/26. There is continued dialogue with NGC and the parties are working towards a Statement of Common Ground the first draft of which was submitted at **Deadline 1 [REP1-096]**. A second draft of the Statement of Common Ground with NGC will be submitted at Deadline 3, which will reflect the ongoing engagement with NGC.
WR-AR-002	Public Rights of Way	**Archaeology and Footpaths**	The Applicant agrees that prehistoric – Roman period artefacts have been found within the vicinity of Great Moulton, as detailed within **ES Volume 3,**

ID	Theme	Comments/Issues Raised	Applicant's Response
	Cultural Heritage	According to the Domesday Book, Great Moulton had a church and a mill in 1086 Neolithic and prehistoric objects have been found here, as well as several Roman items. All Saints Church, Little Moulton, known as The Sanctuary, was a medieval church. A number of local footpaths would be affected by this application, from the old boundary marker, Hundred Lane, to the well-known Boudicca Way. These footpaths have existed for centuries and should be protected. A haul route across Hundred Way would irrevocably alter this footpath pattern.	**Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]**. This assessment also notes the recording of medieval settlement at Moulton St Michael within the 1086 Domesday Book, which included both mill and church. The former All Saints Church and Little Moulton were further assessed as part of **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]** and **ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024]**, with no below-ground remains of the Church identified within the Site during archaeological evaluation, as detailed within **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172].** The Applicant also refers to its response provided within the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response Part 1 [REP1-099]** under comment ID AR-004. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			these recreational resources. It includes consideration of Hundred Lane GM-FP19.
WR-AR-002	Soils and Agricultural Land	**Agricultural land** I have not found a comprehensive survey of the grade of agricultural land covered by the East Pye application. However, I understand that a larger proportion of it is grade 3 and above and I am concerned about the food security implications of this. In order for the Planning Inspectorate to make an informed decision, it will be necessary to consider this information.	The results of the detailed ALC survey of the order limits excluding the CRC can be found in Table 15.6 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The full detailed ALC report can be found in **ES Volume 3, Appendix 15.1- Agricultural Land Classification [APP-182]**. Across Sites 1 – 10 and the BESS 829.1 ha of Best and Most Versatile (BMV) land has been found. The area of agricultural land in Norfolk is about 417,633ha in Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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. 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-AR-003	BESS Safety Scheme Description	**BESS Siting and Safety** I understand that the site currently proposed for the BESS is grade 2 land. Land of this grade should normally be reserved for food production. Furthermore, this site is close to homes, water supplies and heritage assets, all of which may be negatively impacted by its proximity. The fear of a BESS fire would be alleviated if it were placed further away from residential buildings.	The Applicant notes this comment and refers to its response to BEPS-452 in **The Applicant Response Relevant Representations Part 3 -Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** regarding the risk of air emissions during a BESS fire on nearby sensitive receptors, including residential dwellings. Across Sites 1 – 10 and the BESS 829.1 ha of Best and Most Versatile (BMV) land has been found. The area of agricultural land in Norfolk is about 417,633ha in Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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 is not significant on a local, county, regional or national basis. As assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** the BESS is likely to be restorable back to a comparable ALC grade following decommissioning.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Effects of the BESS on dwellings, water and heritage assets are assessed in their respective ES chapters and or technical reports.
WR-AR-004	Transport and Access	**HGVs** Single track roads across the area cannot accommodate the HGVs and other large vehicles needed to create this solar installation. I note that Frith Way in Great Moulton has been added to the HGV routes. This single-track road cannot accommodate HGVs and other large vehicles. If changes are made to widen the road, these will be permanent and out of character with the landscape.	The Applicant acknowledges the concerns raised regarding the use of Frith Way for construction traffic. The suitability of Frith Way informed the development of the construction traffic strategy and associated mitigation measures. Vehicle tracking assessments were undertaken to demonstrate that the proposed vehicle types could safely access the relevant parts of the Scheme using the proposed routes. The Applicant does not propose permanent widening of Frith Way. Nevertheless, where temporary alterations are required to facilitate construction traffic, any affected areas would be reinstated following completion of the relevant works and returned to their previous condition, where appropriate.
WR-AR-005	Ecology and Biodiversity	**Deer and other wildlife** There are two concerns regarding deer in Norfolk and Suffolk and the cumulative impact of infrastructure projects. The first is that the habitat of large animals, such as Red Deer will be split into areas too small for the herd to remain healthy. The	Deer species do not receive direct legislative protection relevant to ecology or nature conservation. Whilst deer species are not listed as Priority species, they may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996).

ID	Theme	Comments/Issues Raised	Applicant's Response
		second is that smaller deer, such as muntjac will be forced out of the countryside, into residents' gardens where they are likely to eat the plants they find. Wildlife will be affected by noise and construction activity. I urge the applicants for all large solar farms to consider evidence for the ecological outcomes that are achievable for solar farm schemes when they are planned, designed and managed with wildlife as a priority, such as the 12-year ecological monitoring report from Broxted Solar Farm.[1]	It was agreed through the EIA scoping process that the only mammal species which would be assessed and which do not warrant full legal protection would be those listed within Section 41 of the Natural Environment and Rural Communities Act 2006. The Planning Inspectorate agreed that '*subject to the agreement of relevant consultees, the Inspectorate agrees that significant effects are unlikely to occur on these species*' and the matter could be scoped out. The Scheme's operational phase is considered likely to benefit these priority species through habitat improvements created for wider BNG purposes and with the provision of precautionary pollution prevention measures provided within the **Outline OEMP [REP1-060]**. 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 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.

[1] https://www.suffolkwildlifetrust.org/sites/default/files/2026-08/Broxted%20Solar%20Farm%20Report%202026%2C%20SWT%20Wilder%20Ecology.pdf

ID	Theme	Comments/Issues Raised	Applicant's Response
			The indicative alignment of perimeter fencing is shown on **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**. Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the **Draft DCO [REP1-014]**. Protection measures for brown hare and hedgehogs are described in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050]**. Management of retained and newly created habitats that will benefit wildlife (including hares) are prescribed within the **Outline LEMP [REP1-064]**.
WR-AR-006	Water Environment	**Flooding** Parts of the area suggested for solar installations is liable to flood and the flood risk is likely to worsen in coming years. This risk to the solar panels themselves needs to be identified and taken into account.	The Applicant refers the Respondent to the previous responses on this matter within **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** (refs. SAG-006).
WR-AR-007	Construction and Decommissioning	**Long term consequences of this application** East Pye Solar state, on their website: "The design life of East Pye Solar is expected to be approximately 60 years. Therefore, if consent is granted, the	The **Draft DCO [REP1-014]** secures a Requirement for decommissioning and restoration to ensure that the Scheme, apart from the National Grid Substation and the Grid Connection Infrastructure which will

ID	Theme	Comments/Issues Raised	Applicant's Response
		permission for it would be temporary. At the end of the period of consent, the land returns to agricultural use." **The questions for me is: "Is it possible for the land to return to agricultural use at the end of 60 years, or will it have been irreparably damaged and changed?** I repeat the concern I made in my oral statement that land may be permanently bought up by foreign investors with no interest in the community or food production, either on the open market or through compulsory purchase. This risk needs careful exploration. Connection to the national grid is a challenge for a solar farm in this location. The connection is to the existing overhead line and there are questions around whether the existing line would be able to accept all the electricity created by a solar farm of this size. Without this assurance, this scheme would be redundant. Furthermore, National Grid have informed me that the sites of any substations are not yet known, despite East Pye having chosen Site 1B as the location for a new National Grid substation. A substation would be permanent and would not be	remain in situ, is decommissioned at the end of the 60-year operational lifetime. With the exception of the National Grid Substation and Grid Connection Infrastructure, the soil and land conditions will be returned to its original use and condition as far as practicable. **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. It is acknowledged within **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** that there could be a potential permanent loss or downgrading of BMV quality agricultural land in relation to the location of Project Substations, BESS, National Grid Substation, Access Tracks and tree planting. Decommissioning is outlined in the **Outline SRMP [APP-204]**. The Outline SRMP sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014].** The Outline SRMP provides the structure and the types of controls to be included within the detailed SRMP. The outline SRMP sets out an

ID	Theme	Comments/Issues Raised	Applicant's Response
		removed after 60 years. This is the first aspect of the scheme that would be permanent. If the solar farm itself is decommissioned after 60 years, would it be possible, at that point to put the land back to agricultural use? Food security must be considered alongside energy security and it is important to understand whether any loss of agricultural land is temporary or permanent.	outline of the matters that need to be defined or secured. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade. The land will be handed back to the respective landowners following decommissioning. There are currently no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade. The area of agricultural land in Norfolk is about 417,633ha (see Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**). The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			economy, with or without continued agricultural production from sheep grazing, is not significant on a local, county, regional or national basis. The Applicant has provided a response on the matters of foreign investment and compulsory purchase raised within Mr Ramsay's oral submission at AR-003 of the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**. The position of National Grid regarding the siting of the substation is set out within responses to written representations; **The Applicant' s Response to the Examining Authority's First Written Questions [REP1-083]** and the **Statement of Common Ground with National Grid Electricity Transmission plc [REP1-092]**.
WR-AR-008	Human Health	**Effect on residents** I know that many local residents, some of whom are my constituents, have experienced stress and illness already, due to this application. It is vital that everyone involved in bringing applications for solar farms works with the local community and this does not appear to have been done well in the case of East Pye.	The Applicant acknowledges concerns regarding stress, anxiety and uncertainty associated with the Scheme and other proposed infrastructure schemes in the area. These matters are considered within the Human Health Summary Statement (presented in **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**), which draws together findings from across the Environmental Statement and considers cumulative and in-combination effects on health and wellbeing. The assessment recognises

ID	Theme	Comments/Issues Raised	Applicant's Response
		The cumulative impact of overlapping infrastructure schemes needs to be taken into consideration. People living in the north-west of my constituency have faced applications from East Pye, Tasway and the Norwich to Tilbury pylon line. Even if none of these applications were passed, the stress caused by multiple schemes even being considered in an area is detrimental to residents' health and needs to be considered along with the benefits of such schemes. Multiple schemes can have the effect of boxing in rural communities with negative mental health impacts for residents. A number of constituents have contacted me to let me know of the impact that this application is having on their lives. The youngest was 11 years old.	that large infrastructure projects can affect wellbeing through uncertainty, perceived environmental change and concerns about potential risks (see section 18.6.26). Mental health and wellbeing are also considered in the **Equality Impact Assessment [APP-214]**, including issues such as access to nature, place attachment, community cohesion, social participation and cumulative wellbeing effects. In response to Examination matters, the Applicant has prepared a **Mental Health and Wellbeing Addendum [REP1-107]**, which provides further consideration of these themes and supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment. The Addendum concludes that, while some individuals may experience anxiety, concern or distress, significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups. Accordingly, while the Applicant acknowledges the experiences reported by some residents, including potentially vulnerable groups, the assessments conclude that the Scheme would not result in likely significant adverse effects on population health and wellbeing.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-AR-009	Compulsory Acquisition	Compulsory purchase I have been informed that residents have received communications from Dalcour Maclaren about the possible compulsory purchase of their homes. I understand that that this is common where large solar farms are being considered. The anxiety and distress caused to residents by the possibility of compulsory purchase are huge. If solar farms are temporary and in appropriate places, compulsory purchase options should not be necessary.	The Applicant is not seeking compulsory acquisition powers for any homes, gardens and buildings and this has never formed part of the proposal. The scope of the powers sought is shown on the **Land Plan [APP-006]**. In addition, Article 31(2) of the **Draft DCO [REP1-014]** makes it expressly clear that the general power of temporary possession under the DCO does not authorise the undertaker to take temporary possession of any house or garden belonging to a house; or any building (other than a house) if it is for the time being occupied.
WR-AR-010	Need for the Scheme	**Regional Power allocations** Renewable energy from solar is essential for our energy security. However, small-scale solar installations on the distribution network would be preferable to industrial projects on the transmission network. Smaller scale projects create fewer difficulties for the people living around them and do not generally require the creation of access roads, compulsory purchases or the permanent alteration of the landscape. The transmission network in this area already carries electricity produced by	The Applicant welcomes this representation's support for renewable energy from solar. Section 6.3 of the **Statement of Need [APP-206]** explains that smaller schemes can make a valuable contribution to meeting demand. Paragraph 3.3.12 of NPS EN-1 demonstrates the government's view that smaller schemes are needed alongside, but not instead of, large-scale ground mounted solar schemes. This is because the bulk generation potential of large-scale schemes and their connection to the National Electricity Transmission System (NETS) enables their benefits to be felt more widely.

ID	Theme	Comments/Issues Raised	Applicant's Response
		offshore wind, so it may not always be able to carry the additional solar-generated electricity. This could mean that the owners of solar farms receive payment for not producing energy via constraint payments. In relation to DESNZ targets for 2031 to 2035, East Anglia is oversubscribed for solar. This does not mean we should not invest in renewables, but it does mean we can do it in ways that are more palatable to local communities.	Section 8.5 of the **Statement of Need [APP-206]** provides analysis on the contribution of wind and solar to securely and reliably meeting UK national demand. This is because when wind power is higher (e.g. in the winter) solar power is often lower; and vice-versa. This also reduces the likelihood of localised constraints. Section 8.4 of the **Statement of Need [APP-206]** discusses curtailment (i.e. constraints and compensation for constraints). The **Statement of Need** concludes that transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations, and that the Scheme is unlikely to receive consumer-funded compensatory curtailment payments during is operational life. In relation to the government's regional capacity ranges, Section 7.6 and Section 7.7 of the **Statement of Need [APP-206]** explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). Further, the

ID	Theme	Comments/Issues Raised	Applicant's Response
			Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6).

4.2 Cllr Margaret Thomas (Norfolk County Council West Depwade division)

Table 4.2 Applicant's Response to Cllr Margaret Thomas [REP1-251] and [REP1-436]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-MT-001	EIA Methodology	I wish to oppose this application and highlight the lack of rigorous assessment and impact studies into the suitability of this application for the location.	The **ES [APP-036 to APP-195]** and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. 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.
WR-MT-002	Human Health	I wish to convey the perceptions and feelings raised to me by many of my constituents of a disregard and contempt for the needs and wellbeing of the community by the applicant.	The Applicant acknowledges the concerns raised regarding perceptions that the needs and wellbeing of local communities have not been given sufficient weight. The Applicant recognises that some residents may experience anxiety, concern, frustration or distress in relation to the Scheme and the examination process. These issues have been considered through the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**, which recognises that major infrastructure projects can affect wellbeing through pathways including uncertainty, perceived

ID	Theme	Comments/Issues Raised	Applicant's Response
			environmental change and concern regarding potential risks (see section 18.6.26). Mental health and wellbeing have also been considered through the **Equality Impact Assessment [APP-214]**, which includes consideration of place attachment, access to nature, community participation, social inclusion and cumulative wellbeing effects. The assessment recognises that some groups may be more sensitive to these effects and that individual experiences may vary. In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. which provides further consideration of uncertainty, perceived environmental change, place attachment, social participation and cumulative wellbeing effects. The Addendum supports the conclusions of the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**.
WR-MT-003	Consultation and Engagement	**The application process** There are serious concerns regarding the transparency and accessibility of the application process.	The Applicant considers that the various rounds of consultation and community engagement has been undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the

ID	Theme	Comments/Issues Raised	Applicant's Response
		Residents have found it extremely difficult to understand and engage with the documentation. Key documents have been available only online, often through links within other documents. Some of these links have been difficult to navigate or have not worked. This has created clear barriers to public participation. Digital exclusion is widespread in rural South Norfolk. Connectivity in West Depwade is poor, there are no public libraries and there are few community facilities offering internet access. Many residents have therefore had no practical means of taking part. South Norfolk has an older-than-average population, with a median age above both regional and national averages. Census data shows that approximately 45% of residents are aged 50 or over. Many older residents face barriers relating to digital skills, confidence and accessibility. A process that relies so heavily on online engagement risks excluding a significant proportion of those most affected. Older residents are also more susceptible to the stress and anxiety caused by prolonged	Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. At both non-statutory and statutory consultation, the Applicant held events within the Core Consultation Zone (presented in Chapter 7 of the **Consultation Report [APP-024]**) where members of the community had the opportunity to meet with the Applicant's team and view and takeaway consultation materials. In addition, the Applicant has met with and provided with responses to individuals and community groups throughout the pre-application process. The Applicant's Community Relations team has been available to assist members of the public and organisations via a series of free-to-use communication channels (phone, post and email). Members of the public are welcomed to use these channels to ask about the application documents, as well as how to access and read Scheme maps. These channels were publicised through newspaper adverts and press releases, on the Applicant's website, in consultation materials and on-site notices. The Application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore,

ID	Theme	Comments/Issues Raised	Applicant's Response
		uncertainty over their homes and communities. Communication throughout the consultation and examination has been unclear. Residents have been left confused about how to engage, which documents are relevant and how to make their views known. This has added considerably to their distress and left many feeling excluded and unheard. Much of the documentation is highly technical and not presented in plain English. There is also a perception that some documents are misleading or incomplete. The onus should not fall on members of the public to identify shortcomings. Information should have been presented openly and transparently from the outset.	USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-003]**, which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents.
WR-MT-004	Cumulative and In-Combination Effects Human Health	**Cumulative impacts** The application fails to adequately assess the cumulative and combined effects of this proposal, both of itself and alongside other Nationally Significant Infrastructure Projects proposed, consented or under consideration across Norfolk. Assessing impacts in isolation, topic by topic,	The Applicant refers to its response to Great Moulton Parish Council in Table 2.2 of this document under WR-GMPC-004 regarding the assessment of cumulative effects. The Applicant does not agree that cumulative effects have been assessed solely on a topic-by-topic basis or that the wider implications for health and wellbeing have not been considered.

ID	Theme	Comments/Issues Raised	Applicant's Response
		understates and distorts the true scale of change residents face. A comprehensive assessment is required of the wider health, wellbeing, social and service provision implications of large-scale solar development across Norfolk. The impacts extend well beyond visual change and land use. They affect sense of place, community identity, mental wellbeing, financial security, access to the countryside and confidence in the future. These effects must be assessed collectively. Attention must be given to solastalgia, the distress and grief experienced when a familiar and valued landscape is fundamentally altered. For many residents, this landscape forms part of their personal history, family life and community identity. Families have walked the same footpaths for generations. The industrialisation of this rural environment will have profound psychological consequences.	The Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** was prepared specifically to bring together the findings of the Environmental Statement and consider how different environmental and social changes may combine to affect the same communities. It considers potential effects on physical, mental and social wellbeing arising from factors including landscape and visual change, noise, transport and access, air quality, recreation, socio-economics, climate change and the water environment. It also includes consideration of cumulative and in-combination effects (See Section 18.6.231 to 18.6.249). In combination effects are also addressed in **ES Volume 1, Chapter 19 – In Combination Effects [APP-055].** The Applicant recognises that many of the concerns raised relate not only to individual environmental effects, but to broader issues such as sense of place, community identity, access to the countryside, attachment to familiar landscapes and uncertainty about future change. These issues were raised through consultation and are reflected in both the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**, which consider place attachment, access to nature, changes in landscape

ID	Theme	Comments/Issues Raised	Applicant's Response
			character, community participation, social inclusion and cumulative wellbeing effects. The Applicant acknowledges that some residents may experience distress associated with changes to valued landscapes and the rural environment (see section 18.6.111 of the Human Health Summary Statement and 7.4.5 of the Equality Impact Assessment). However, these concerns have been considered within the assessment of mental wellbeing pathways, including perceived environmental change, attachment to place and cumulative wellbeing effects. The assessments conclude that, whilst individual experiences will vary, likely significant adverse effects on population health and wellbeing have not been identified (see sections 18.6.250 to18.6.266 of Human Health Summary Statement and section 9.1.6 of the Equality impact Assessment). In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects, and supports the conclusions of the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-**

ID	Theme	Comments/Issues Raised	Applicant's Response
			054] and the **Equality Impact Assessment [APP-214]**.
WR-MT-005	Human Health	The loss of historic footpaths and long-established recreational routes must also be assessed as a heritage and wellbeing issue. These routes form part of the social fabric and collective memory of local communities, and their loss would erode a shared cultural inheritance. Residents have lived for an extended period under the threat of significant change to their homes. Many feel trapped and unable to plan for the future. Chronic uncertainty is a recognised driver of stress and anxiety, and chronic stress harms both physical and mental health. The assessment must address this, with regard to those who are vulnerable through age, disability, pre-existing health conditions or caring responsibilities. Although not yet formally documented, there is considerable anecdotal evidence of worsening anxiety and depression and the exacerbation of existing long-term conditions. Residents have described feelings of desperation, powerlessness and exclusion. These concerns are not irrational. They are legitimate concerns	The Applicant acknowledges the concerns raised regarding the importance of historic footpaths and long-established recreational routes to local communities, including their contribution to recreation, social connections, sense of place and wellbeing. The Human Health Summary Statement contained within **ES Volume 1, Chapter 18 -Other Environmental Matters [APP-054]** recognises that access to recreational routes, opportunities for physical activity, connection to nature and people's experience of their surroundings can influence mental wellbeing and sense of place. The assessment also recognises that changes to landscape character, visual amenity and recreation can affect nearby residents and users of Public Rights of Way. The Applicant does not agree that these matters have not been considered. The **Equality Impact Assessment [APP-214]** specifically considers access to nature, place attachment, neighbourhood character, social participation, community inclusion and mental wellbeing. It also recognises that some individuals may experience anxiety, concern or distress in response to environmental change and uncertainty, and that effects may be experienced

ID	Theme	Comments/Issues Raised	Applicant's Response
		about a development of unprecedented scale in a predominantly rural area.	differently by older people, disabled people and those with existing health conditions. The Applicant acknowledges that some residents may feel stress or uncertainty in relation to the Proposed Development. These issues have also been considered through the Mental Health and Wellbeing Addendum, which provides additional consideration of uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. Whilst the Applicant recognises the concerns and experiences described by residents, the Human Health Summary Statement contained within ES **Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**, the **Equality Impact Assessment [APP-214]**, and the Mental Health and Wellbeing Addendum do not identify likely significant adverse effects on population health and wellbeing.
WR-MT-006	Human Health Construction and Decommissioning	The health effects of construction activity, operational noise and increased traffic, including disturbance to sleep, must be evaluated. The World Health Organization has highlighted the harmful effects of chronic noise exposure on health and sleep. The loss of tranquillity and green space must also be considered, as access	The Applicant notes this comment regarding a detailed risk assessment for emissions to air during a BESS fire and refers to its response to Block East Pye Solar under BEPS-452 in **The Applicant Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		to nature is a recognised protective factor for physical and mental health. Detailed risk assessments are required for fire, air quality, traffic safety and water resources. Residents are concerned about the potential for fire, smoke and harmful emissions from the Battery Energy Storage System. The substantial increase in traffic on narrow rural roads raises concerns about road safety, access for disabled residents, active travel routes and access to green space. Many properties rely on private boreholes, and construction could affect water quality or cause contamination. These risks are foreseeable and must be objectively assessed.	The Applicant acknowledges the concerns raised regarding the potential health effects of construction activity, operational noise, increased traffic, sleep disturbance, loss of tranquillity and access to green space. The potential effects of the Scheme on population health and wellbeing have been assessed through the Human Health Summary Statement contained **within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]**. Construction, operational and decommissioning noise have been assessed, recognising potential effects such as annoyance and sleep disturbance. Construction noise would be managed through the **Outline CEMP [REP1-058]**, while operational noise from the BESS, substations and associated infrastructure would be controlled through measures including low-noise equipment, acoustic enclosures and barriers secured through the **Design Principles, Parameters and Commitments [REP1-078]** and the **Outline OEMP [REP1-060]**. Following mitigation, residual operational noise effects are assessed as negligible or minor adverse and not significant (see section 18.6.177 of the Human Health Summary Statement). The assessment also considers the contribution of landscape, visual amenity, recreation and access to nature to health and wellbeing. While significant

ID	Theme	Comments/Issues Raised	Applicant's Response
			landscape and visual effects are predicted in some locations, these are expected to reduce over time as mitigation planting establishes (see section 18.6.122 to 18.6.124). The Scheme would retain the PRoW network, provide new permissive paths and deliver landscape and green infrastructure enhancements. Potential effects from construction traffic, including road safety, access, severance and impacts on vulnerable groups, have been assessed and would be managed through the **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203].** Similarly, potential effects on private water supplies, groundwater and water quality would be mitigated through pollution prevention, drainage and water management measures secured through the **Outline CEMP [REP1-058]**. Residual transport and water environment effects are assessed as not significant. Overall, the Human Health Summary Statement concludes that, with mitigation in place, the Scheme would not result in likely significant adverse residual effects on population health during construction, operation or decommissioning. A **Mental Health and Wellbeing Addendum [REP1-107]** has also been prepared following feedback received during examination to provide further consideration of issues including uncertainty, environmental change,

ID	Theme	Comments/Issues Raised	Applicant's Response
			place attachment, access to nature and cumulative wellbeing effects.
WR-MT-007	Human Health Socio-Economics	Many households have invested a lifetime of work and savings in their homes. There is widespread concern about the effect on property values, marketability and remortgaging. Retirement plans built over many years are now overshadowed by uncertainty, and many residents feel unable to move, sell or remortgage. The mental health impacts of potential financial loss and diminished security must be recognised in the assessment. This community is being required to shoulder a disproportionate burden in pursuit of national policy objectives. Residents are being asked to accept extensive and potentially irreversible impacts, despite significant uncertainty about the long-term consequences of developments on this scale. Many feel their communities are being used as a testing ground for large-scale solar projects in the absence of peer-reviewed evidence on its cumulative social and health effects. The absence of evidence must not be used to justify limiting assessment.	The Applicant acknowledges concerns regarding property values, financial security, uncertainty and associated wellbeing impacts. Concerns relating to housing and business values, place attachment, uncertainty and environmental change have been considered within **Equality Impact Assessment [APP-214]**, as factors that may influence mental wellbeing (see Table 8.2: Construction Phase-Mental health related equality effects). However, property values are not a recognised environmental effect within the EIA framework. The Health Summary Statement contained **within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** was prepared in accordance with ISEP guidance and draws together health pathways identified across the Environmental Statement, including landscape and visual change, transport and access, noise, air quality, socio-economics and cumulative effects. It specifically considers perceived environmental change, uncertainty and wellbeing impacts. Additionally, in response to Examination submissions, mental wellbeing, equality impacts, place attachment, access to nature, perceived risk and cumulative wellbeing effects have been

ID	Theme	Comments/Issues Raised	Applicant's Response
		Uncertainty strengthens the case for more rigorous assessment. The precautionary principle should apply, and the Applicant must be required to demonstrate, through robust evidence, that all foreseeable social, health, environmental and economic impacts have been fully considered and mitigated.	considered through the **Mental Health and Wellbeing Addendum [REP1-107].** Taking account of embedded mitigation and secured management measures, the Human Health Summary Statement concludes that the Scheme would not result in likely significant adverse effects on population health during construction, operation or decommissioning. The Equality Impact Assessment similarly concludes that significant negative equality impacts are unlikely at a population level. These conclusions are reinforced by the findings of the Mental Health and Wellbeing Addendum, which provides further consideration of wellbeing, uncertainty, place attachment and perceived environmental change
WR-MT-008	Human Health	This application would bring major change to rural communities across West Depwade. Residents have raised serious concerns about access to the process, the quality of consultation, the complexity of the documentation and the failure to assess the cumulative impacts of this and other major energy projects across Norfolk. Concerns about health and wellbeing, the countryside, local roads, private water supplies, property values and residents' ability to remain in their homes are	The Applicant notes this comment and refers to the following responses: • WR-MT-003 regarding the adequacy of consultation in this table. • WR-GMPC-004 regarding Great Moulton Parish Council's comments on the assessment of cumulative and in-combination effects in Table 2.2 of this document. • WR-AR-008 regarding Adrian Ramsay MP's comments on human health and wellbeing in Table 4.1 of this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		genuine. They must be properly assessed, not dismissed because evidence is currently limited. The application does not provide a clear picture of the combined impacts, and the true scale of change has been understated. Further work is required before any decision is made.	• WR-MT-014 regarding private water supplies in this table. • WR-MT-011 regarding financial impacts in this table. • WR-MT-013 regarding transport and access in this table.
WR-MT-009	Cumulative and In-Combination Effects	**Requested actions** The Examining Authority and the Secretary of State are respectfully asked to: 1. Require a full cumulative impact assessment covering this scheme and other major energy and infrastructure projects planned, approved or under consideration across Norfolk.	The Applicant refers to its response to Great Moulton Parish Council under WR-GMPC-004 in Table 2.2 of this document regarding the assessment of cumulative effects.
WR-MT-010	Human Health	2. Require a health and wellbeing impact assessment covering stress, anxiety, uncertainty, noise, loss of countryside, solastalgia, community impacts and the effects on vulnerable residents.	The Applicant does not agree that a further standalone health and wellbeing impact assessment is required. The matters raised, including stress, anxiety, uncertainty, loss of countryside, community impacts and effects on vulnerable groups, have been considered through the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and

ID	Theme	Comments/Issues Raised	Applicant's Response
			the **Equality Impact Assessment [APP-214]**.These assessments consider physical, mental and social wellbeing, vulnerable groups, cumulative effects, place attachment, perceived environmental change, access to nature and community wellbeing. In response to matters raised during the Examination, the Applicant has also prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects and supplements the assessments submitted with the Application. It supports the conclusions of the submitted assessments, finding that significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups, while recognising the importance of ongoing community liaison and communication throughout construction. The Applicant therefore considers that the matters identified in this representation have been appropriately assessed and that a separate additional health and wellbeing impact assessment is not necessary.
WR-MT-011	Socio-Economics	3. Require a detailed assessment of the financial impact on residents, including property values,	The Applicant's **Book of Reference [REP1-018]** includes persons who may be eligible to claim

ID	Theme	Comments/Issues Raised	Applicant's Response
		marketability, remortgaging and retirement planning.	compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any diminution in value caused by physical impacts from the operation of the Scheme, such as noise and vibration. However, as is the case for all nationally significant infrastructure projects, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
WR-MT-012	BESS Safety	4. Require further assessment of the risks from the Battery Energy Storage System, including fire, smoke, emissions and emergency response arrangements.	The Applicant notes this comment and refers to its response provided to Block East Pye Solar under BEPS-452 in **The Applicant Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-MT-013	Transport and Access	5. Require further assessment of traffic, road safety, accessibility for disabled people, and the effects on local communities during construction and operation.	The Applicant does not consider that further assessment is required. Traffic assessment work is informed through dialogue with Norfolk County Council, the Highways Authority. The effects of construction and operational traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** using the methodology set out within the ISIP Guidelines for Environmental Assessment of Traffic and Movement

ID	Theme	Comments/Issues Raised	Applicant's Response
			(2023), which represents recognised industry best practice for transport assessment within Environmental Impact Assessment. This assessment included consideration of traffic effects, road safety, accessibility and the effects on local communities, including non-motorised users, and determined the significance of effects in accordance with the ISIP methodology.
WR-MT-014	Water Environment	6. Require a detailed assessment of the impact on private water supplies, boreholes and groundwater.	As detailed in numerous earlier responses to Relevant Representations, the risks to human health and groundwater receptors have been assessed within **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**. The assessments presented in Chapter 16 and its appendices have been undertaken in accordance with the methodology agreed through EIA Scoping and consultation. The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure and states that "*The results of the ground investigation will be used to inform the detailed design of the Scheme*". The ground investigation will include investigation of the geology and hydrogeology, allowing further assessment of the potential for any risks to Private Water Supplies and groundwater.
WR-MT-015	Consultation and Engagement	7. Require the application documents and key information to be provided	The Applicant notes this comment and refers to its response to WR-MT-003.

ID	Theme	Comments/Issues Raised	Applicant's Response
		in a clearer format, with plain-English summaries and non-digital alternatives such as paper copies.	
WR-MT-016	Human Health	8. Give significant weight to residents' evidence about the effects on their health, wellbeing and quality of life.	In response to matters raised during the Examination, the Applicant has prepared a **Mental Health and Wellbeing Addendum [REP1-107]**. The Addendum provides further consideration of issues including stress, anxiety, uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. These are the matters most frequently raised by residents, community groups and other stakeholders during the Examination. The Addendum supplements the Human Health Summary Statement contained within **ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]**, providing additional detail on mental health and wellbeing pathways and consideration of evidence submitted by local residents and communities during the Examination. The Addendum supports the conclusions of the existing assessments and concludes that, whilst some individuals may experience anxiety, concern or distress in relation to the Proposed Development, significant adverse effects on mental health and wellbeing are not expected at either the population level or for identified vulnerable groups. It also

ID	Theme	Comments/Issues Raised	Applicant's Response
			identifies mitigation and communication measures relevant to these pathways, including continued community liaison, communication regarding construction activities and access changes, and ongoing engagement with affected communities.
WR-MT-017	EIA Methodology	9. Apply the precautionary principle wherever evidence is limited or uncertainty remains.	See the Applicant's response to WR-MT-001 regarding the Rochdale Envelope approach, and WR-BPC-026 in Table 2.1of this document, regarding the mitigation and control measures secured through outline management plans.
WR-MT-018	EIA Methodology	10. Refuse development consent unless it can be shown that the cumulative social, health, environmental and economic impacts have been fully assessed and can be effectively mitigated.	See the Applicant's responses to WR-MT-001 to WR-MT-017 above. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

4.3 Cllr Suzanne Wateridge

Table 4.3 Applicant's Response to Cllr Suzanne Wateridge [REP1-267]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SW-001	Scheme Description	Firstly, I would like to express my shock that Tivetshall was not included in the scheme description letter that my husband and I received as residents at the beginning of May 2026. Apart from Great Moulton, I believe that no other village in South Norfolk will be affected as much as Tivetshall will be by the East Pye scheme. These two villages between them will be hosting the majority of the infrastructure, which comprises a 400kv National Grid substation; a 400kv project substation; a 400kv substation and BESS; and several new pylons (mostly replacing existing but taller). As far as I know, Tivetshall Parish Council were not even approached by East Pye, at any stage in the consultation process, unlike Great Moulton.	The Applicant notes this comment and refers to its response to Cllr Suzanne Wateridge regarding the Scheme description under comment SW-002 in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. Tivetshall Parish Council was notified of all phases of consultation and was identified as a host parish council within the core consultation zone as set out in the **Consultation Report [APP-024]**. Tivetshall Parish Council was included in the Applicant's S42 Consultee List, as set out **in Consultation Report Appendix 7: Section 42 Consultation Materials [APP-031]**.
WR-SW-002	Transport and Access	This is a very rural community who will be heavily impacted by this amount of infrastructure in one small area. The B1134 in Tivetshall is proposed as the main access for all vehicles connected	The Applicant acknowledges the concerns raised regarding the potential overlap between the Proposed Development and the proposed Norwich to Tilbury project.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Cumulative and In-Combination Effects	with the site. Although this makes sense given that it runs directly from the A140 artery, this road is also being proposed as one of National Grid's Norwich to Tilbury haul roads, as the new pylon line will cross the road a couple of miles to the west. If both get approved, then we would have five years of heavy traffic and disruption, with both schemes running mostly concurrently on what is already a very busy road, with many HGVs. I would hope that logistical coordination would be carried out by both projects, working together so that the roads do not become gridlocked with lorries.	Please refer to the Applicant's response to SW-003 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**, which states that: "*The assessment of cumulative effects of construction traffic, including the Norwich to Tilbury project, are detailed within Section 11.11 of ES Volume 1, Chapter 11 – Transport and Access (APP-047) and utilise the information available at the time of the assessment and in agreement with Norfolk County Council*." The Applicant therefore considers that the effects of construction traffic associated with the Norwich to Tilbury project have been considered within the transport assessment where relevant information was available at the time of assessment.
WR-SW-003	Transport and Access	The plans also point out various 'pinch points' along this road, which are primarily very tight corners where visibility is poor and the road would need widening, or vegetation/signs would need removal. It is imperative that there are speed limits in place throughout the construction process. I would also hope that it is obvious where it makes sense to widen the road and where it does not. We need	The Applicant notes the concerns raised regarding potential highway modifications and traffic management measures. Please refer to the Applicant's response to SW-004 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**, which addresses these matters

ID	Theme	Comments/Issues Raised	Applicant's Response
		further clarity on whether East Pye means to widen these pinch points on the north or south of the road.	
WR-SW-004	Transport and Access	Station Road is lined along the stretch between Lodge Road and the BESS site with some beautiful, healthy veteran trees. There is no need for any of these trees to be removed. Finally, the more recent HGV route that has been proposed to access the National Grid Substation site in Great Moulton is completely unsuitable. Lodge Road and Frith Way are single track roads, with very few passing points.	The Applicant notes the concerns raised regarding Station Road, Lodge Road and Frith Way. Please refer to the Applicant's response to SW-006 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**, which addresses these matters in further detail.
WR-SW-005	Arboriculture Compulsory Acquisition	I understand the latest idea is to cut down many veteran oak trees (those further up on Frith Way now have TPOs and those on Lodge Road are of equal age and status), and to widen Lodge Road into a two lane road. This would mean destroying residents' front gardens and driveways. As East Pye have stated that there will be not be any compulsory purchase of houses and gardens, I do not see how this would be possible.	There would be no loss of ancient or veteran trees as secured through the **Outline CEMP [REP1-058]**. However, the oak trees on Firth Way and Lodge Road are not categorised as veteran. The Applicant has reviewed the inclusion of land on Frith Way and Lodge Road. If there is a more specific location the Respondent is referring to the Applicant would encourage them to provide this for further review by way of What3Words location. Frith Way and Lodge Road connect Great Moulton South to Station Road (B1134). The Applicant confirms certain sections of these roads have been included within the order limits of the scheme. However, there are no plans to widen Lodge Road

ID	Theme	Comments/Issues Raised	Applicant's Response
			and no part of any houses, gardens or buildings are included within these land plots.
WR-SW-006	Landscape and Visual	I am also astounded that as far as I can tell, there is little to no mention of the sensitive receptors in Tivetshall on Station Road (Site 1) that directly face the BESS site. There are five cottages that will be directly in front of the 400kv Substation associated with the BESS and yet when I read the Environmental Statement Volume 3 (ref EN0110114), Fernleigh Farm appears to be the only one listed. Three of these are terraced cottages that are on the same side of the road as the BESS site and will be less than 50m (the supposed buffer zone) from the substation. The other three are directly facing the BESS substation, with no hedging or screening, on the other side of the road. How can this be permissible?	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and its associated appendices, includes a number of view locations in relation to this location and these receptors. Both on Station Road, with BESS VL4 is located to the west from the nearby PRoW, and BESS VL9 adjacent to the cottages. The properties are also identified on **ES Volume 2, Figure 7.9 - Residential Receptors Plan [APP-084]** which informs the Residential Visual Amenity Assessment (RVAA) in **ES Volume 3, Appendix 7.8 [REP1-046]**. The forementioned properties are identified as being located more than ~200m from the Scheme and have therefore not been considered in the RVAA.
WR-SW-007	Landscape and Visual Noise and Vibration	And is there a reason why the 400kv substation is located in front of the BESS? As the substation is likely to make more noise, and is visually much taller, surely it would be less impactful both visually and aurally to situate the substation behind the BESS, making it less visible from the road and further away from the cottages that	The arrangement of the BESS and 400 kV Project Substation has been considered taking account of their respective noise contributions, the mitigation available for each element, and the wider technical and operational requirements of the Scheme. The Applicant does not consider that simply reversing the position of the BESS and substation would

ID	Theme	Comments/Issues Raised	Applicant's Response
		back onto this site. There has also been no clarity as to whether this substation will use air-insulated or gas-insulated switchgear. The former is significantly louder, and has been described as creating sharp, loud bangs or crackling and buzzing when wet.	necessarily provide a better overall operational noise outcome. **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** assesses noise from project substations, allowing for both Gas Insulated Switchgear (GIS) and Air Insulated Switchgear (AIS) systems. The assessment focuses on continuous noise generated by the substations. Transformers/reactors and cooling fans are the dominant sources within substations, and continuous noise from switchgear is unlikely to be discernible. The modelled source sound levels presented in **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]** therefore take noise from either AIS or GIS into account. Switchgear is likely to be activated very infrequently, typically only a few times a year for outages and maintenance, and in emergencies to protect the substation and electricity network infrastructure from lightning strikes or faults. Noise from switchgear switching is of very short duration. No significant effects on noise-sensitive receptors are anticipated due to the low noise level and infrequency of operation.
WR-SW-008	Landscape and Visual	Moving up to Great Moulton where I am a councillor, there are many properties listed as being at 'High' risk of adverse	The proposed landscape measures, as presented on the **Green Infrastructure Strategy [REP1-013]**,

ID	Theme	Comments/Issues Raised	Applicant's Response
		effects from the siting of the National Grid Substation. Despite trawling through the documents, I cannot seem to find what mitigation is being suggested for these properties. As we know, no amount of screening can ever hide a substation and it would take decades for trees to even begin to do so.	include strengthening of hedgerows, tree belts and woodland planting, to the north of the Scheme. At Site 1, hedgerows, hedgerow trees, linear tree belts and woodland blocks are already observable features which limit visibility within this otherwise open, large-scale landscape, and these proposed measures reflect existing features found in the locality and reinforce the existing hedgerow and field pattern
WR-SW-009	Water Environment	Referring to the Environmental Statement Volume 3, we are told that the National Grid Substation is located over a Principal Aquifer and within a Drinking Safeguard Zone. Surely despite any precautions East Pye say they will take, this is a completely inappropriate place to build a major piece of permanent infrastructure. The Project Substation is also proposed to be built over the same aquifer. Additionally, why are we told that sensitive water receptors are located within the site and have the potential to be impacted by the scheme, and there should be appropriate mitigation, only to then be informed that the impacts of the scheme on these receptors have been assessed as 'not significant'? And while we are on	The Chalk and Crag bedrock geology that is classified by the Environment Agency as a Principal Aquifer forms the bedrock for large areas of Norfolk. The Principal Aquifer is overlain by Diamicton of the Lowestoft Formation. Whilst the variable nature of Diamicton is recognised, it remains a predominantly cohesive (and therefore low permeability) stratum and whilst more granular and water-bearing layers/lenses may be present, these are unlikely to be laterally and vertically extensive. The variable extent and thickness of the Diamicton has also been recognised, and the assessment approach has taken into account consultation with the Environment Agency in this regard. As shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** the Diamicton extends to between 20m and 30m thick in the area of Site 1 where the National Grid Substation, Site 1B

ID	Theme	Comments/Issues Raised	Applicant's Response
		the subject of water, this site is being proposed at a time when East Anglia has been officially classified by the EA as severely water stressed. The amount of water that will be needed during construction process, not to mention if there was ever a fire at any of the sites, means the whole region will suffer at a time when water is only going to become more scarce as climate change increases.	project substation and BESS are proposed. The piled foundations for these elements (if found to be required following the post-consent ground investigation and the progression of detailed design) would extend to a maximum of 12m and would therefore not penetrate into the underlying Principal Aquifer. The Applicant considers it unreasonable to assume that any development of permanent infrastructure that interfaces with the bedrock is inappropriate, and reiterates that mitigation measures for the protection of controlled water resources and human health outlined within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**.
WR-SW-010	Ecology and Biodiversity Soils and Agricultural Land	Regarding the solar fields themselves, I see no promise of sheep grazing, wildflower meadows or bee-keeping. These were lies that we were told during the public consultations about how the land would be managed under the solar panels. So much more could be done with the ground underneath the panels. What about agrivoltaics as a concept for example? And where is the biodiversity net gain across the entire site? It does not seem anything like a net	Further information regarding the management of habitats is provided within the **Outline LEMP [REP1-064].** This includes details of the modified grassland located beneath the panels included within the Scheme (amongst others) and the management approach for these, which includes the option of grazing by sheep, once established. Seasonal mowing at appropriate times of the year e.g. late-summer and early-spring if required, is an alternative approach to sheep grazing that can reward equally as beneficial results as well as avoiding unnecessary

ID	Theme	Comments/Issues Raised	Applicant's Response
		gain to me, rather a net loss. The number of trees that will be felled cannot be ameliorated by planting more trees. It takes 30/40 years for a tree to start absorbing anything like as much carbon as a mature or veteran tree	nutrient enrichment from sheep waste. A seasonal cut will take as much nutrients out of the soil as possible and allow species of forbs to establish by slowing down the growth of fast-growing grasses and therefore ensuring a more species-diverse grassland. Effort will be made to increase the species-diversity and grassland condition of the grasslands underneath the solar arrays, however due to shading from the panels, the general approach is that grasslands should be recorded as modified grassland in poor condition, although it may be possible to increase this habitat condition within the Order Limits. The Applicant agrees that there are significant opportunities to enhance biodiversity beneath and around the solar panels. The Outline LEMP establishes the overarching principles for habitat management, with further detail to be developed through the LEMP through a Requirement in the **Draft DCO [REP1-014]**. The Applicant notes the comment regarding beekeeping and will consider whether this could form part of the future management approach as the LEMP is developed. Further information regarding habitat management is provided within the **Outline LEMP [REP1-064],** which establishes the overarching principles for

ID	Theme	Comments/Issues Raised	Applicant's Response
			management of habitats, including modified grassland beneath the solar panels. Management may include sheep grazing once established or, alternatively, seasonal mowing at appropriate times of year to reduce nutrient enrichment and encourage establishment of a more species-diverse grassland. Effort will be made to increase species diversity and grassland condition beneath the solar arrays; however, due to shading from the panels, the general approach is that these areas should be recorded as modified grassland in poor condition, although improvements may be achievable within the Order Limits. There would be no loss of Ancient Woodland or veteran trees within or adjacent to the Order Limits**. The Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances within the design for the ancient woodland, ancient and veteran trees in accordance with Natural England and Forestry Commission's Standing Advice.
WR-SW-011	Cumulative and In-Combination Effects	What about the cumulative impact? Quite apart from situating huge industrial infrastructure in a couple of square miles of rural fields, sandwiched between two small villages, there is also increasing evidence that when a permanent NG	The Applicant refers to its response to Great Moulton Parish Council in Table 2.2 of this document under WR-GMPC-004 regarding the assessment of cumulative effects. The Scheme's application for development consent does not include a data centre. Any hypothetical data

ID	Theme	Comments/Issues Raised	Applicant's Response
		Substation is built, planning applications for data centres will follow. Indeed, we already have news of a data centre planning application about to be submitted in South Norfolk. Again, I refer to my concerns about water scarcity. A data centre water consumption can be compared to that of an entire town.	centre project that is separate to the Scheme would need to apply for its own planning permission and be considered by the appropriate authority on its own merits, including a cumulative assessment with the East Pye scheme.
WR-SW-012	Point of Connection	Why have we heard nothing from National Grid about their substation associated with this project? I know that our MP Adrian Ramsay is still waiting for answers to questions put to them weeks' ago about this site. I do not feel this proposal meets any of their stated Horlock Rules regarding the siting of a new substation.	The Applicant has provided a response to Adrian Ramsay MP's oral submissions at the Open Floor Hearing within the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response' [REP1-099]**. The Applicant has also provided a response to Cllr Catchpole on site selection criteria and the Horlock Rules in Table 3.1 of the **Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-098].**
WR-SW-013	Scheme Description	Finally, regarding the proposed pylons. National Grid's Norwich to Tilbury project is proposing new 50m high pylons. So what is the need for the four new pylons proposed by East Pye (replacing three existing, and creating one new) to be up to 61m high?	The Scheme proposes to divert the existing dual circuit 400kV overhead line into a newly constructed double busbar National Grid Substation (Work No. 5), with the works delivered in carefully planned stages to maintain safety, minimise disruption and ensure continuity of supply throughout. Up to four new pylons would be installed (of which three would

ID	Theme	Comments/Issues Raised	Applicant's Response
			be associated with the repositioning of existing pylons and up to one new pylon), with a maximum height of up to 61m above ground level to allow National Grid flexibility in the detailed design of the substation, alongside up to one temporary pylon to facilitate the transition. Up to three existing pylons would then be removed following the installation of the repositioned new pylons, allowing for the decommissioning and removal of the existing section of overhead line, thereby reducing long term visual and environmental impacts on the local area. Further detail is provided in the **ES Volume 1, Chapter 4 – The Scheme [REP1-022]** and the **Design Principles, Parameters and Commitments [REP1-078]**. The parameters are assessed on a worst-case basis in accordance with the Rochdale Envelope approach set out in **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]**, and the maximum height is secured through Requirement 5 in Schedule 2 of the **Draft DCO [REP1-014]**, which requires the detailed design to accord with the parameters set out in the **Design Principles, Parameters and Commitments [REP1-078]**. The National Grid Norwich to Tilbury project is a separate scheme with its own design parameters.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SW-014	Concluding remarks	We must have large-scale renewable energy projects in the UK and we must progress them as quickly as possible. However, the proposed site for the infrastructure relating to this project is to my mind completely untenable for all the reasons I have outlined here.	The Applicant notes this comment.

4.4 Cllr Karl Catchpole

Table 4.4 Applicant's Response to Cllr Karl Catchpole [REP1-358]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KC-001	Opening statement	I write to object strongly to the East Pye Solar proposal. I was born and spent my formative years living in the South Norfolk village of Newton Flotman until I was 21yrs old. I own land in south Norfolk and hope to move back soon for the benefit of [redacted]. This is a short sighted, mindless race to ruin our beautiful countryside, so my objection is coming from a different angle to most. I sincerely hope that the decision makers can be compassionate, visionary, diligent and caring for the sake of our children's future. I'm also mindful it is a governments duty to make sure its citizens are safe and the country secure. Making us increasingly reliant on food imported from abroad contradicts this in time of war.	The Applicant notes this comment. The need for the Scheme is set out within the **Statement of Need [APP-206]**. The benefits of the Scheme are set out within Section 5 of the **Planning Statement [REP1-074]**. At a national level, the Scheme will make a significant contribution to meeting the urgent need for low carbon electricity generation and the Government's legally binding net zero and energy security objectives
WR-KC-002	Scheme Description	**A desktop understanding of a living landscape**	The **ES [APP-036 to APP-195]** and environmental 'in-field' surveys have been undertaken by

ID	Theme	Comments/Issues Raised	Applicant's Response
	Ecology and Biodiversity	The Applicant's submissions rely far too heavily on desktop analysis of South Norfolk's land, roads and communities. Maps, aerial imagery and traffic models cannot capture how this area works day to day. Our narrow lanes, blind bends and unmarked verges are used by farm machinery, school transport, cyclists, riders and walkers. A construction programme that looks workable on screen would be very different on the ground. The same gap applies to the people and the environment. The Applicant has not shown a real understanding of South Norfolk's rural communities, which depend on farming, tourism and the quiet character of the countryside. Nor has it shown an understanding of the habitats, hedgerows, watercourses and wildlife that make up this landscape. We have several endangered species for example the White Clawed Crayfish, Barbastelle bats and Barn Owl. Proper consideration requires time spent here, listening to residents.	competent experts with considerable experience assessing similar schemes. The traffic survey data collected and used within the assessment is summarised in Table 11.10 of **ES Volume 1, Chapter 11 - Transport and Access [APP-047].** Traffic survey data used within the assessment is robust and representative of local network conditions. The Applicants LVIA (presented in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**) and associated appendices provides a detailed overview of the landscape and visual baseline supported by extensive site survey to aid local understanding. 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. Habitat and species survey/assessment methodologies have been agreed through formal scoping and consultation with statutory bodies and presented within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** (and associated technical appendices).

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KC-003	Policy Compliance	**The pace of the proposal** The pace at which this scheme is being pushed forward is a concern. Decisions that will change this landscape for generations are being rushed, and local people are left struggling to keep up with the volume of documents. A development of this scale and permanence deserves unhurried scrutiny, not a timetable driven by investors' returns.	The Applicant considers that the various rounds of consultation and community engagement has been undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. At both non-statutory and statutory consultation, the Applicant held events within the Core Consultation Zone (presented in Chapter 7 of the **Consultation Report [APP-024]**) where members of the community had the opportunity to meet with the Applicant's team and view and takeaway consultation materials. In addition, the Applicant has met with and provided with responses to individuals and community groups throughout the pre-application process. The Applicant's Community Relations team has been available to assist members of the public and organisations via a series of free-to-use communication channels (phone, post and email). Members of the public are welcomed to use these channels to ask about the application documents, as well as how to access and read Scheme maps. These channels were publicised through newspaper adverts and press releases, on the Applicant's website, in consultation materials and on-site notices.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KC-004	Policy Compliance	**The cost of a rushed transition** The drive to reach net zero at speed is, in my view, placing a growing burden on ordinary working people and families. Household energy bills have risen sharply, and many people in South Norfolk are already making difficult choices about heating and food. Policy that raises costs for those least able to bear them, while the profits of overseas investors grow, is not a fair transition. Decisions of this scale need calm, long-term thinking from those in authority, not a race to meet targets that sacrifices communities and countryside along the way. I would urge the Government to slow down and put its effort into a more visionary, sustainable and British energy future.	The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The Secretary of State will consider the Scheme in accordance with the currently designated NPSs and any other applicable policy or considerations the Secretary of State deems to be important and relevant. The PA2008 makes it clear that, in making a decision, the Secretary of State "must decide the application in accordance with any relevant NPS" (s104(3)), subject to certain provisos. The Secretary of State is entitled to disregard any representations that relate to the merits of the designated National Policy Statement (NPS). Section 7.6 and Section 7.7 of the **Statement of Need [APP-206]** explain that the solar component of the Scheme has been prioritised by NESO as part of their ongoing grid reforms with a Gate 2 connection offer. This means that NESO have included the

ID	Theme	Comments/Issues Raised	Applicant's Response
			Scheme within the list of schemes which have been prioritised to satisfy the current relevant regional solar capacity range to 2035 (i.e. without the Scheme, the national and regional solar capacity ranges would not be met). In other words, the Scheme has been prioritised as part of the government's long-term plan to deliver and maintain a clean power electricity system on the way to achieving net zero by 2050.
WR-KC-005	The Applicant	**A better, British alternative** This scheme is led by Island Green Power and backed by Macquarie, an overseas investment bank. The profits will leave our communities, while the harm stays here. I urge the Applicant and the Government to consider a British alternative: Rolls-Royce small modular reactors. They offer secure, low-carbon power around the clock, need a fraction of the land of solar farms, and would build UK engineering skills and jobs. Energy policy should be planned for the long term and should not sacrifice productive countryside for intermittent generation.	The Applicant refers to its response to representation WR-KC-004 above. The Applicant refers to APL-005 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** regarding Island Green Power and Macquarie. The Applicant agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets. Table 2.1 of the **Statement of Need [APP-206]** demonstrates that the government is seeking to support significant capacities of all low-carbon generation technologies to come forwards to achieve Clean Power on the way to Net Zero by 2050. Schemes of other technologies cannot therefore be considered as an alternative to the Scheme, because those other schemes are also needed.

ID	Theme	Comments/Issues Raised	Applicant's Response
			However, the **Statement of Need [APP-206]** provides evidence in relation to the capacities of main categories of renewable generation technologies tasked to support the delivery of a low carbon and secure electricity system. While the need for unprecedented capacity growth is urgent, some technologies (e.g. nuclear, SMRs, tidal) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in NPS EN-1). Yet, to address the ongoing climate emergency, it is critical that the UK urgently develops a large capacity of low carbon generation. Solar is a proven technology, and the **Statement of Need [APP-206]** provides evidence on the substantial benefits brought forward by large-scale ground mounted solar electricity generation generally. The Scheme is a viable proposal to use proven technology with short development timescales, thereby delivering dependable decarbonisation benefits.
WR-KC-006	Socio-Economics	**Protecting British jobs and British interests** I believe we have a responsibility to protect British industry and British jobs, and to be cautious about handing our	**ES Volume 1, Chapter 14 – Socio Economics [APP-050]** assesses socio economic effects for each phase of the Scheme. These are summarised in Table 14.28. Significant effects identified are Major or Moderate Beneficial on jobs in South Norfolk in

ID	Theme	Comments/Issues Raised	Applicant's Response
		countryside and energy future to overseas investors. Too often, foreign-backed developers appear to treat communities like South Norfolk as an easy target, pressing ahead with scant regard for local knowledge or local concern. British engineering firms and suppliers deserve the opportunity to lead our energy future, rather than being pushed aside by large international finance. The Applicant's own submission supports this concern. It contains errors, including [insert specific examples, such as incorrect road descriptions, wrong place names, outdated traffic data, missed local features or inaccurate statements about land use, with document references where possible]. Mistakes of this kind suggest a lack of care and an unfamiliarity with the area that fits a pattern of working roughshod over the communities affected. People who had taken the time to understand South Norfolk would not have made them.	the Construction Phase and Decommissioning Phase, and on Skills and the Labour Market in all three phases. No significant adverse effects are identified, with the temporary accommodation market and the tourism industry also assessed. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline Employment, Skills and Supply Chain Strategy (ESSCS) [REP1-070]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [REP1-014].** This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme. The Applicant welcomes further engagement with Mr Catchpole to correct any errors found in the DCO application documents.
WR-KC-007	Concluding remarks	**Our children's inheritance** South Norfolk's historic landscape is irreplaceable. Industrialising it with solar arrays, cabling and substations would	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		damage it for decades and affect the generation now growing up here. I would ask the Secretary of State, and the Minister, Miatta Fahnbulleh MP, to look to the future and not trade away land that cannot be restored once it is lost. For these reasons, I ask the Examining Authority (Mr Cliff) to recommend that development consent be refused.	

4.5 Cllr Daniel Elmer

4.5.1 The Applicant notes that Cllr Daniel Elmer's Deadline 1 Submission [REP1-452] contains his response to an Action Point from Open Floor Hearing 1. The Applicant has considered all suggested locations for Accompanied Site Inspections in the **Applicant's Draft Itinerary for the Accompanied Site Inspection [REP1-082]**.

4.5.2 The Applicant considers Cllr Elmer's wider submission to be a repeat of his oral submission at Open Floor Hearing 1. The Applicant has responded to this submission in the **Written Summary of Open Floor Hearing 1 Oral Submissions and the Applicant's Response [REP1-099]**.