East Pye Solar

Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies and SoCG Parties

Revision 1

October 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/9.29

The Infrastructure Planning (Examination Procedure) Rules 2010

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1 Introduction

1.1 Purpose of the document

1.1.1 This document provides the Applicant's response to all relevant documents submitted by statutory parties 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 Local Impact Reports [EN0110014/EXAM/9.30]**
- **The Applicant's Response to Submissions Received at Deadline 1 – Parish Councils and Non-Statutory Organisations [EN0110014/EXAM/9.33]**
- **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 the **Contents, Glossary and Abbreviations [APP-036]**.
- **Table 1.2** lists the statutory bodies and undertakers that submitted responses at Deadline 1. A link to each Written Representation or submission made by each party is linked. Each submission can be found within the Examination Library.
- These submissions are presented and responded to in **Section 2** of this document.

Table 1.1 List of Acronyms of Submission Documents

Acronym	Document
DCO	Development Consent Order
EIA	Environmental Impact Assessment

Acronym	Document
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 Assessment
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 List of submissions responded to in this document

Examination Library Reference	Acronym	Book of Reference Plot Number	Submission Received From
REP1-186	HE	Not included in the Book of Reference	Historic England
REP1-189	NE	N/A	Natural England
REP1-398	NGT	02-003, 02-005, 02-006, 02-009, 02-009, 02-011, 02-011, 02 015, 02-047, 07-018, 07-020, 07-020, 07-023, 08-003, 08-006, 08-006, 08-007, 08- 007, 09-010, 09-012, 09-013, 09-014, 09-015, 09-018, 09-019, 09-020, 09-020, 09-023, 09-023, 09-024, 09-024, 11-011, 11-017, 13-007, 13-007, 13-007, 13-007, 13-008, 13-008, 13-008, 13-008, 13-009, 13-	National Gas Transmission Plc

Examination Library Reference	Acronym	Book of Reference Plot Number	Submission Received From
		009, 13-010, 13-011, 13-012, 13-014, 13-014, 13-014, 13-014, 13-014, 13-015, 13-016, 13-016, 13-017, 13-017, 13-018, 13-018, 13-026, 14-009, 14-009, 15-009, 16- 018, 16-019, 16-020, 16-023	
REP1-269	NGET	17-013, 17-015, 17- 020, 17-029, 17-040, 18-003, 18-006, 18- 009, 19-001, 19-002, 19-003, 19-009, 19-010, 19-011, 19-012, 19-013, 19-014	National Grid Electricity Transmission Plc
REP1-191	EA	02-014, 02-016, 09-013, 09-015, 09-020	Environment Agency

2 The Applicant's Response to Submissions Received by Statutory Bodies at Deadline 1

2.1 Historic England

Table 2.1 Applicant's Response to Historic England [REP1-186]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HE-001	General Remarks	Summary Historic England considers that the Environmental Statement provides a broadly adequate basis for the Examination of the Scheme's effects upon the historic environment. We welcome the extent to which heritage considerations have informed the Scheme design, including development exclusions and setbacks which reduce effects upon the settings of designated heritage assets. Historic England nevertheless considers that there are matters that require clarification or resolution during the Examination. These principally concern the assessment of effects upon heritage significance through changes within setting; the distinction between visual screening and mitigation of harm to	The Applicant notes Historic England's concerns regarding the following points: • Assessment of effects upon heritage significance through changes within setting; • The distinction between visual screening and mitigation of harm to heritage significance; • Reasonable worse-case and cumulative assessment; • Securing of relevant heritage mitigation and design commitments, as detailed within the ES. The Applicant has addressed a number of the above points within the subsequent responses; however, the clarification of certain points will need to be addressed separately, with this noted within individual comments as required below.

ID	Theme	Comments/Issues Raised	Applicant's Response
		heritage significance; the reasonable worst case and cumulative assessment; and the securing of heritage mitigation and design commitments relied upon in the Environmental Statement. In particular, the Applicant should be asked to demonstrate how the heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the DCO. We also consider there is an apparent inconsistency between Requirement 5 and the Design Principles, Parameters and Commitments which should also be resolved, particularly in relation to the controls applying to the National Grid Substation and overhead grid connection infrastructure. Historic England welcomes the archaeological mitigation framework provided through Requirement 12 and the Archaeological Mitigation Strategy. Subject to the resolution of the detailed matters identified in this Written Representation, we consider that this provides an appropriate basis for further archaeological investigation and mitigation. Provision for Historic England's involvement where remains of potential	Heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the design which is articulated in the **Works Plan [REP1-005 and 006];** Requirement 5 of the **Draft DCO [REP1-014]** requires the final details of the Scheme to be approved by the local planning authority. The **Outline OEMP [REP1-060]** sets out set-backs and mitigation in respect of heritage assets at Table 3.6. A detailed OEMP is required to be approved under Requirement 14 of the **Draft DCO [REP1-014]**. The Applicant welcomes Historic England's continued involvement in the Examination process.

ID	Theme	Comments/Issues Raised	Applicant's Response
		national significance or matters within our statutory remit are identified and included in the Environmental Statement. Historic England will continue to engage with the Applicant and relevant local authorities with the aim of resolving the outstanding matters identified in this Written Representation.	
WR-HE-002	General Remarks	1.1 The Historic Buildings and Monuments Commission for England, known as Historic England, is the Government's statutory adviser on the historic environment in England. Historic England is an executive non-departmental public body sponsored by the Department for Culture, Media and Sport. 1.2 The Scheme comprises the construction, operation, maintenance and decommissioning of a solar photovoltaic electricity generating station and associated development, including Battery Energy Storage System infrastructure, Project Substations, Grid Connection Infrastructure and a new National Grid Substation. 1.3 The Scheme has the potential to affect the significance of designated heritage assets, including through changes within	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		their settings. Historic England's principal interests are identified in Section 2 of this Written Representation. 1.4 Historic England provided advice on the Preliminary Environmental Information Report in a letter dated 6 August 2025 and subsequently submitted a Relevant Representation following acceptance of the application. We have continued to engage with the Applicant's heritage consultants during the pre-examination and examination process and are working with the Applicant to prepare a Statement of Common Ground. 15. The application is accompanied by an Environmental Statement prepared under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Historic England considers that the Environmental Statement is broadly adequate for the purposes of the Examination, subject to the matters identified in this Written Representation. 16. This Written Representation expands upon the matters raised in our Relevant Representation and sets out Historic England's comments on the designated heritage assets affected by the Scheme, the Environmental Statement, the draft	

ID	Theme	Comments/Issues Raised	Applicant's Response
		Development Consent Order and associated control documents, and the relevant policy framework. 17. Our Relevant Representation identified potential cumulative effects with Tasway Energy Park as requiring further consideration. The East Pye application documentation now records Tasway Energy Park as being on indefinite hold. In light of that change in circumstances, Historic England does not presently seek further assessment of cumulative effects between East Pye Solar and Tasway Energy Park.	
WR-HE-003	Designated Heritage Assets: Listed Buildings, Conservation Areas and Scheduled Monuments	**General Comments** 2.1 The information relevant to historic environment assessment is found primarily in the following documents: • Environmental Statement – Vol 1 Chapter 7 Landscape and Visual; • Environmental Statement – Vol 1 Chapter 9 Water Environment; • Environmental Statement – Vol 1 Chapter 10 Cultural Heritage; • Environmental Statement – Vol 1 Chapter 16 Ground Conditions	The Applicant notes this comment and confirms that consultations regarding Grade II Listed Buildings, non-designated buildings and non-designated archaeology are also being carried out with both SNDC as the relevant local authority conservation and landscape advisors, and NCCHES as the relevant archaeological advisors.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• Environmental Statement – Vol 3 Appendices 7.1-7.3 Landscape and Visual supporting information; • Environmental Statement – Vol 3 Appendix 10.1 Heritage Statement 2.2 Historic England's primary interest in relation to the Scheme is its effect upon the significance of highly designated heritage assets, comprising Scheduled Monuments, Grade I and Grade II* listed buildings and Conservation Areas. Our consideration includes effects arising through changes within the settings of those assets. 2.3 Historic England has not generally provided detailed advice on Grade II listed buildings, non-designated buildings or non-designated archaeology. We defer to the relevant local authority conservation, landscape and archaeological advisers on these matters, except where they are relevant to the significance or setting of assets within Historic England's remit. We have provided some commentary on methodology relating to the non-designated heritage assets where it is within our remit for specialist advice and in relation to mitigation and the DCO.	

ID	Theme	Comments/Issues Raised	Applicant's Response
		2.4 The comments below focus upon those designated heritage assets and issues where Historic England considers that its advice will assist the Examination. They should be read alongside our detailed comments on the Environmental Statement in Section 3 of this Written Representation.	
WR-HE-004	Methodology/Assessment	2.5 Historic England notes that the Cultural Heritage assessment uses a matrix based EIA methodology, informed by professional judgement, to determine receptor sensitivity, magnitude of impact and significance of effect. We consider this an appropriate approach in principle, provided that professional judgement is used alongside the matrix.	The Applicant agrees with this statement.
WR-HE-005	Methodology/Assessment	2.6 EIA significance and harm to the significance of a designated heritage asset are not interchangeable. An effect which is not significant in EIA terms may nevertheless result in harm to heritage significance. Similarly, effects arising through setting should be assessed by reference to the contribution that setting makes to significance and the effect of the Scheme upon that contribution; visibility is relevant evidence but is not, in itself, determinative.	The Applicant agrees with this statement.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HE-006	Methodology/Assessment	2.7 Historic England's detailed comments on the application of the methodology, including the sensitivity assigned to Conservation Areas, the use of landscape and visual evidence, landscape mitigation and the assessment of cumulative effects, are set out in Section 3 of this Written Representation.	The Applicant notes this comment.
WR-HE-007	Methodology/Assessment	2.8 The comments below focus upon those highly designated heritage assets where Historic England considers that the Scheme has the greatest potential to affect significance, or where further clarification of the Applicant's assessment is required.	The Applicant notes this comment.
WR-HE-008	Church of St Michael, Stratton St Michael – Grade I (NHLE 1304267)	2.9 The Church of St Michael is a highly significant medieval parish church whose significance derives principally from its architectural, archaeological and historic interest. Its rural setting also contributes to its significance and to the ability to appreciate the church as a historic focal point within the surrounding agricultural landscape. 2.10 Historic England welcomes the changes made to the Scheme in response to the church. In particular, the exclusion of the southern fields of Sub-Site 4B from built development and the resulting	The Applicant welcomes Historic England's support for the removal of Solar PV Panels from the southern fields of Sub-Site 4B and notes that comments regarding the assessment of cumulative effects upon the Grade I Listed Church of St Michael (NHLE 1304267) have been addressed in WR-HE-058. The exclusion of the southern fields are secured by design through the **Works Plan [REP1-005 and 006]** which is a control document and is secured within Schedule 12 (Documents and plans to be certified) of the **Draft DCO [REP1-014]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		substantial setback of the panels to retain open land within an important part of its rural setting. The Applicant's Heritage Statement itself recognises that these fields contribute to the ability to appreciate the significance of the church. 2.11 We consider this to be a positive example of mitigation, which has been informed by the assessment of the impact of the proposal on the significance of the heritage assets. The exclusion and setback are important to the support the heritage mitigation and should therefore be appropriately secured through the DCO. Our separate concern regarding the assessment of cumulative effects upon the church is set out in Section 3.	
WR-HE-009	Church of St Catherine, Fritton – Grade I (NHLE 1373281) and Fritton Conservation Area	2.12 The Grade I Church of St Catherine is an important historic focal point within Fritton, and its relationship with the historic settlement and surrounding rural landscape contributes to its significance. These qualities also contribute to the character and significance of Fritton Conservation Area. 2.13 Historic England welcomes the substantial setback of the proposed development from the church and Conservation Area. The Heritage	The Applicant welcomes Historic England's support for the removal of Solar PV Panels from the south-eastern fields of Sub-Site 5B. The removal of Solar PV Panels from the south-eastern fields of Sub-Site 5B are secured by design through the **Works Plan [REP1-005 and 006]** which is a control document and is secured within Schedule 12 (Documents and plans to be certified) of the **Draft DCO [REP1-014]**.

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		Statement concludes that this would retain the prominence of the church and its rural setting, particularly on the approach along The Street. We support this heritage-led design response and again consider it would be important that the development exclusion and setback upon which the conclusion depends should be appropriately secured through the DCO.	
WR-HE-010	Old Rectory, Church Lane, Stratton St Michael – Grade II* (NHLE 1373264)	2.14 The significance of the Old Rectory derives from its architectural and historic interest, together with its relationship with the surrounding rural landscape and the Grade I Church of St Michael. 2.15 The Heritage Statement concludes that the Scheme would cause no harm to the significance of this asset, relying in part upon the separation from the nearest solar arrays and absence of intervisibility. Historic England considers that the conclusion should also be demonstrably based upon the contribution made by the wider rural and historic relationship between the Rectory and church to the significance of the asset, rather than absence of visibility alone. We recommend the applicant is asked to revisit this assessment in light of these	The Applicant notes this comment regarding the Grade II* Listed Old Rectory (NHLE 1373264), which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further engagement with HE will address this in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		comments and in relation to the guidance set out in GPA3.	
WR-HE-011	Oaks Farmhouse, Shotesham Road – Grade II* (NHLE 1170906)	2.16 Oaks Farmhouse has a historic relationship with the surrounding agricultural landscape. The Applicant's assessment acknowledges that Sub-Site 7L forms part of its wider historic agricultural setting, including a former tenurial relationship, and makes some contribution to its significance. 2.17 The Heritage Statement nevertheless concludes that the Scheme would cause no harm, with proposed woodland planting expected to screen the solar arrays over time. Historic England considers that the assessment should more clearly explain why the acknowledged change to land which contributes to significance results in no harm. The effect of the proposed woodland upon the agricultural character of the setting should also form part of that consideration. We recommend the applicant is asked to revisit this assessment in light of our findings.	The Applicant notes this comment regarding the Grade II* Listed Oaks Farmhouse (NHLE 1170906) which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further engagement with HE will address this in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.
WR-HE-012	Church of St Mary, Shotesham – Grade II* (NHLE 1050642) and	2.18 The Grade II* Church of St Mary forms part of the historic settlement of Shotesham within a strongly rural valley landscape. The character and significance of the Conservation Area similarly derive	The Applicant notes this comment regarding the Grade II* Church of St Mary (NHLE 1050642) and Shotesham Conservation Area. These heritage assets were scoped out at PEIR stage; however, further engagement with Historic England will

ID	Theme	Comments/Issues Raised	Applicant's Response
	Shotesham Conservation Area	in part from the relationship between the historic settlement and its surrounding countryside. 2.19 Historic England notes that the Heritage Statement scopes both the Grade II* church and Shotesham Conservation Area out of detailed assessment. This is of concern given the separate landscape evidence, which identifies Site 8 as a highly tranquil rural landscape of high sensitivity and identifies appreciable change within the landscape around Shotesham. 2.20 We therefore consider that further explanation is required to demonstrate that the contribution made by the wider rural and valley landscape to the significance of these assets has been adequately considered, including relevant historic and spatial relationships. The conclusion should not rely principally upon the absence of direct intervisibility. We recommend the applicant is asked to review the position set out in the Environmental Statement.	address them in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.
WR-HE-013	Camp in village, Tasburgh – Scheduled	2.21 The Scheduled Monument 'Camp in village' at Tasburgh is an earthwork enclosure of uncertain date; possibly representing an Iron Age hillfort or early	The Applicant notes this comment regarding the Scheduled Camp in Village, Tasburgh (NHLE 1003984) which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further

ID	Theme	Comments/Issues Raised	Applicant's Response
	Monument (NHLE 1003984)	medieval fortified enclosure. It derives significance both from the extensive archaeological remains known to be preserved within the boundaries of the monument, and from its setting at the core of the original early medieval settlement at Tasburgh, and at a high point within the wider landscape. 2.22 The Heritage Statement, while acknowledging the contribution to significance made by the monument's siting at a high point within the landscape, argues that the part of the landscape in which the proposed scheme is sited does not contribute to the significance of the monument due to the lack of intervisibility between the monument and the area of the proposed scheme. It further argues that, due to the presence of extensive mature screening on and around the monument, the monument now principally derives significance from its archaeological interest rather than its landscape setting. 2.23 Historic England would dispute the conclusion that the scheduled monument at Tasburgh derives significance primarily from its archaeological importance rather than its landscape setting. We further	engagement with HE will address this in more detail within the **Statement of Common Ground (SoCG) with Historic England [REP1-089]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		consider that direct intervisibility between above-ground features of the monument and the wider landscape is not necessarily the most appropriate metric by which to judge whether changes to the landscape setting of the monument will affect its significance. We therefore recommend the applicant is asked to reconsider this matter in light of these comments.	
WR-HE-014	Castle Hill, Hangman's Hill and adjoining earthworks, Darrow Green (NHLE 1002885)	2.24 The above monument has been scoped out of further assessment, despite being located within the 5km study area. We cannot find a justification for excluding this highly designated heritage asset from consideration, other than its lack of direct intervisibility from the scheme. We recommend the applicant is asked to provide additional details to support their position.	The Applicant notes this comment regarding the Scheduled Castle Hill, Hangman's Hill and adjoining earthworks, Darrow Green (NHLE 1002885). This Scheduled asset was scoped out at PEIR stage; however, further engagement with Historic England will address this in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.
WR-HE-015	Newton Flotman Bridge (NHLE 1002885)	2.24 The above is referenced in Table 1 of the Heritage Statement as a Scheduled Monument which has been scoped out of further assessment. We note that the bridge was removed from the Schedule in December 2025, though it remains a Grade II listed building (NHLE 10507706).	The Applicant notes this comment and confirms that Newton Flotman Bridge (NHLE 1002885) was removed from the Schedule 11th December 2025.
WR-HE-016	Volume 1 Chapter 4: The Scheme	3.1 Sections 4.2.18–4.2.24 – Rochdale Envelope and Scheme Parameters. The design of the Scheme retains a degree of	The Cultural Heritage assessments have assessed the Scheme according to the Rochdale Envelope, assuming that the whole of the Scheme (apart from

ID	Theme	Comments/Issues Raised	Applicant's Response
		flexibility through the Rochdale Envelope, including in relation to the arrangement and specification of the Solar PV Panels, Conversion Units, BESS, Project Substations, National Grid Substation and Grid Connection Infrastructure. The Applicant states that each technical chapter has assessed the design identified to be the likely worst case scenario for that discipline and that the detailed design will be required to accord with the Design Principles, Parameters and Commitments. 3.2 Historic England notes this approach. In relation to the historic environment, it will be important that the parameters assessed represent an appropriate realistic worst case for effects upon heritage significance, including effects arising through changes within the setting of designated heritage assets. The heritage worst case will not necessarily be the same as the worst case identified for landscape and visual effects. We will consider this further in our comments on the Cultural Heritage assessment and the relevant supporting documents.	the setbacks) will be covered in Solar PV Panels and associated infrastructure.
WR-HE-017	Volume 1	3.3 Table 4.1 – Scheme Parameters. This table summarises the elements included	The Applicant notes this statement and welcomes Historic England's support of the incorporation of

ID	Theme	Comments/Issues Raised	Applicant's Response
	Chapter 4: The Scheme	in the proposed Scheme. Several of these elements would have a below-ground impact. These elements could therefore affect buried archaeological remains. 3.4 It goes on to state that the PV mounting structures would ordinarily use piled foundations up to 4m below ground level, with concrete feet or other non ground-penetrative techniques used where archaeological protection is required (paragraph 4.3.16). Historic England welcomes the incorporation of archaeological avoidance into the Scheme design.	archaeological avoidance methodologies into the Scheme design.
WR-HE-018	Volume 1 Chapter 4: The Scheme	3.5 Table 4.1 also establishes substantial maximum parameters for some elements of the above-ground electrical infrastructure. These include Project Substations, the National Grid Substation and new/repositioned electricity pylons. The National Grid Substation could occupy a compound of up to 6ha and pylons could extend to 61m above ground level. These elements have the potential to affect the setting and significance of designated heritage assets differently from the solar arrays themselves. The Cultural Heritage assessment should therefore appropriately consider the	The Applicant refers to its response provided in WR-HE-016. The Applicant notes that the assessment 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]** have been undertaken based on the maximum parameters of the Scheme, as set out within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** and considers the combined presence of all above-ground elements of the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		effects of these individual components, as well as their combined presence with the solar arrays and other associated infrastructure.	
WR-HE-019	Volume 1 Chapter 4: The Scheme	3.6 The parameters also include perimeter fencing, CCTV and, around the infrastructure compounds, 3m high palisade fencing. Where relevant to the setting of designated heritage assets, the Cultural Heritage assessment should take account of these ancillary elements and the degree to which, collectively, they may alter the character and experience of the existing rural landscape.	The Applicant refers to its response provided in WR-HE-018.
WR-HE-020	Volume 1 Chapter 4: The Scheme	3.7 Several of the elements of the proposed Scheme could have quite deep impacts. For example, some of the structures may require piled foundations up to a maximum depth of 12m. This includes the Substations, the National Grid Substation, Grid Connection Infrastructure and the BESS (Table 4.1). If piling options are going to be used, the impacts that this may have on buried archaeological and palaeoenvironmental remains needs to be considered.	The Applicant notes that as outlined in **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, within those areas of the Scheme that there will be known extensive impacts (i.e. BESS, Substations, working compounds) will be subject to informative trenching at 3.5% by area to help clarify the archaeological and palaeoenvironmental potential of these areas.
WR-HE-021	Volume 1 Chapter 4: The Scheme	3.8 The below-ground impacts of some of the elements have not been defined. This includes the Conversion Units,	The Applicant notes that the ground impacts of some elements of the Scheme have not yet been defined. As outlined in both **ES Volume 1, Chapter 10 –**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Substations, Pylons and elements of the fencing/lighting. Information is needed so that it is clear if/how buried archaeological remains may be impacted by the proposed development.	**Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, further stages of archaeological works will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES (in their capacity as archaeological advisors to the local planning authority) that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme.
WR-HE-022	Volume 1 Chapter 4: The Scheme	3.9 Sections 4.3.8–4.3.17 – Solar PV Panels and Mounting Structures. The Scheme allows for either Single-Axis Tracker Panels and/or Fixed Panels. The Tracker Panels could reach a maximum height of 4.5m and would move from east to west during the day, returning to a resting position at 60 degrees overnight; the Fixed Panels could reach a maximum height of 3.5m.	The Applicant notes this comment.
WR-HE-023	Volume 1 Chapter 4: The Scheme	3.10 In considering effects upon the setting of designated heritage assets, it will be important that the Cultural Heritage assessment has appropriately considered the panel option which represents the realistic, worst case for the specific heritage receptor. In the case of Tracker Panels, this should take account where	The Applicant notes that the assessment of effects upon the setting of designated heritage assets, as presented in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 – APP-168]** have considered a 'worse-case scenario'.

ID	Theme	Comments/Issues Raised	Applicant's Response
		relevant not only of their maximum height but also of their changing orientation and appearance over the course of the day.	
WR-HE-024	Volume 1 Chapter 4: The Scheme	3.11 Section 4.3 Conversion Units and other electrical infrastructure. Historic England welcomes the intention for finishes to Conversion Units to use subdued, non-reflective tones selected to sit as discreetly as practicable within the surrounding environment. Where the Cultural Heritage assessment relies upon the colour, materials or finish of infrastructure to avoid or reduce harm to the significance of designated heritage assets, appropriate commitments should be secured through the detailed design process.	The Applicant notes this comment. In respect of the Conversion Units the **Design Principles, Parameters and Commitments** document **[REP1-078]** ('DPPC') sets out the commitment to seek to use subdued, non-reflective tones and to site them discreetly, where practicable within the surrounding environment. The final details of the Scheme are required to be approved in accordance with the DPPC via Requirement 5 of the **Draft DCO [REP1-014]**.
WR-HE-025	Volume 1 Chapter 4: The Scheme	3.12 Cabling and trenchless crossings. We are pleased to see that the potential impacts of cabling in areas of archaeological sensitivity have been considered, to avoid or minimise disturbance below ground level (Section 4.3.24). 3.13 It is noted that trenchless cable route crossings may be required at key locations, including the use of Horizontal Directional Drilling (HDD). The use of HDD will require the excavation of a launch pit and a reception pit (Section	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** to include details regarding the requirement of archaeological works at HDD locations at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		4.3.16), with an area of up to 25m by 25m required at each pit. The potential impact on heritage will need to be considered not only for the HDD cable route, but also for the launch and reception pits.	
WR-HE-026	Volume 1 Chapter 4: The Scheme	3.14 Section 4.4.61 – Landscape and Ecological Mitigation. We note that an Outline Landscape and Ecology Management Plan accompanies the DCO Application and that a detailed LEMP would be produced prior to the start of construction. Landscape planting may have an important role in reducing effects upon the setting of designated heritage assets. 3.15 Where such planting is relied upon as heritage mitigation, however, consideration should be given to the contribution made by setting to the significance of the affected asset rather than visibility alone. Screening will not necessarily mitigate effects arising from changes to historic landscape character, openness, designed or historic views, or spatial and functional relationships between heritage assets and their surroundings. The character and location of new planting should itself be sympathetic to the historic environment.	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HE-027	Volume 1 Chapter 4: The Scheme	3.16 Sections 4.5.10–4.5.12 – Operational Lighting. We welcome the intention that lighting would not generally be required within the Sites during the operational phase, with routine maintenance undertaken during daylight hours as far as practicable. Motion-sensing security lighting would, however, be provided at the Project Substations, National Grid Substation and BESS Compound. 3.17 Where the character of darkness and the absence of artificial lighting contribute to the setting and significance of designated heritage assets, the potential effect of operational lighting should be appropriately considered. We welcome the commitment to minimise light spill and would expect this to be secured through the detailed design and OEMP.	The Applicant notes that **Lighting Strategy [APP-151]** is considered appropriate for the Scheme and with the measures secured through the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060],** as well within detailed OEMP, will not result in any harm to the setting and significance of designated heritage assets.
WR-HE-028	Volume 1 Chapter 4: The Scheme	3.18 Section 4.6 – Decommissioning. It is noted that the Scheme will be in operation for 60 years (Section 4.6.1) and that cables, foundations and below ground infrastructure may be left in situ during the decommissioning phase (Sections 4.6.3 and 4.6.6). It should be stated in the Cultural Heritage chapter if this may impact the future application of geophysical surveys in the area.	The Applicant acknowledges that remains of the Schemes cables, foundations and below-ground infrastructure which may be left in-situ following decommissioning may have an impact upon the future application of geophysical surveys within limited areas of the Scheme boundary. The Applicant will update **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and relevant technical appendices to state such at Deadline 3; however, it is noted that these changes will not alter the

ID	Theme	Comments/Issues Raised	Applicant's Response
			conclusions reached within the cultural heritage assessments.
WR-HE-029	Volume 1 Chapter 4: The Scheme	3.19 We also note that, while much of the solar generating infrastructure would be removed following the 60-year operational period, the National Grid Substation and Grid Connection Infrastructure would remain in situ. Mitigation planting specifically required to support the location of the National Grid Substation would also be handed over to National Grid for its continued maintenance and management. The Cultural Heritage assessment should therefore distinguish between those effects which would genuinely be temporary and reversible following decommissioning and those arising from infrastructure and associated landscape changes which would remain. Any reliance upon the temporary nature or reversibility of the Scheme when assessing harm to the significance of designated heritage assets should reflect this distinction.	The Applicant notes that **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** does include an assessment of potential impacts arising from the retention of certain built and landscape elements of the Scheme following decommissioning. It concluded that there will not be any significant effects upon cultural heritage assets.
WR-HE-030	Volume 1 Chapter 7: Landscape and Visual	3.20 Role of the LVIA in the heritage assessment. Historic England notes that Chapter 7 assesses landscape and visual effects, while Conservation Areas and other designated heritage assets are	The Applicant notes the Consultees response.

ID	Theme	Comments/Issues Raised	Applicant's Response
		assessed as receptors in Chapter 10. We consider this distinction reasonable in principle and recognise that the LVIA provides useful evidence for understanding changes within the settings of designated heritage assets, including through its study areas, ZTV, viewpoints and assessment of changes to landscape character and perceptual qualities. 3.21 However, LVIA conclusions do not determine effects upon heritage significance. A landscape or visual effect which is not significant in LVIA terms may nevertheless affect the significance of a heritage asset, and setting is not limited to visibility. Relevant considerations may include historic landscape character, openness, land use, spatial relationships between historic places and the experience of moving through the landscape. The adequacy of the study area and visual evidence for heritage purposes, and the significance of any resulting changes, should therefore be established through the Cultural Heritage assessment in Chapter 10.	
WR-HE-031	Volume 1 Chapter	3.22 Section 7.7 – Embedded mitigation. Historic England welcomes Design Principle 2.7 at paragraph 7.7.12, which	The Applicant welcomes Historic England's support of Design Principle 2.7, para. 7.7.12.

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	7: Landscape and Visual	requires the Scheme to: 'Consider the setting of heritage assets and mitigate any impact by design, where practicable'.	
WR-HE-032	Volume 1 Chapter 7: Landscape and Visual	3.23 We also note the wider principles requiring the Scheme to respond to landscape character, retain and enhance existing vegetation, create woodland belts and native tree planting, restore hedgerows and carefully site infrastructure and landscape buffers. 3.24 These measures have the potential to reduce effects upon the settings of designated heritage assets. However, screening should not in itself be equated with mitigation of effects upon heritage significance. Where openness, agricultural character, historic land-use patterns, designed or incidental views, or relationships between historic places contribute to significance, new woodland, hedgerow or other planting could itself alter that contribution even where it reduces visibility of Scheme infrastructure. 3.25 We will therefore consider in reviewing Chapter 10 whether landscape mitigation relied upon to reduce effects upon designated heritage assets has been designed in response to the	The Applicant notes the Consultees response.

ID	Theme	Comments/Issues Raised	Applicant's Response
		contribution made by their settings to their significance, rather than principally to screen the Scheme from view. Any measures relied upon in reaching the heritage conclusions should also be adequately secured through the Design Principles, Parameters and Commitments and/or other relevant DCO controls.	
WR-HE-033		3.26 Section 7.8 – Assessment of likely effects. Historic England notes that the assessment identifies significant adverse landscape and visual effects across a number of parts of the Scheme, including an increased urbanising influence from infrastructure with industrial characteristics within a rural and relatively open landscape. These findings provide relevant evidence for Chapter 10 where rural or agricultural character contributes to the significance of designated heritage assets through their setting. Effects upon heritage significance should not be discounted solely because intervening vegetation limits direct visibility of Scheme infrastructure.	The Applicant notes the Consultees response.
WR-HE-034	Volume 1 Chapter 7: Landscape and Visual	3.27 Site 8 – Shotesham Historic England notes that the Applicant's own LVIA identifies appreciable landscape and visual change associated with Site 8.	The Applicant notes the Consultees response.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Chapter 7 concludes that Site 8 would experience significant adverse landscape effects during operation, which remain Moderate and Significant at Year 15 despite maturation of landscape mitigation. The overall conclusions similarly identify Site 8 as one of the locations at which significant adverse residual landscape and visual effects are concentrated.	
WR-HE-035	Volume 1 Chapter 7: Landscape and Visual	3.28 The visual assessment also identifies significant effects at viewpoints in and around Shotesham. Site 8-VL2, at the origin of Shotesham FP18 on Wash Lane, is of particular relevance. The associated visualisation is a winter view at 32.6m AOD across the rural landscape towards Sites 8A and 8B. The detailed visual assessment describes a direct view towards solar arrays within Site 8B occupying elevated land across the valley, with planting subsequently relied upon to screen those arrays.	The Applicant notes the Consultees response.
WR-HE-036	Volume 1 Chapter 7: Landscape and Visual	3.29 Historic England notes, however, that no viewpoint appears to have been specifically selected to illustrate the setting of the Grade II* Church of St Mary, Shotesham, including relevant views to or from the church and its relationship with	The Applicant notes the Consultees comment. The receptor is located over 2km from the Scheme and ~2.4km from the nearest solar development area. **ES Volume 2, Figure 7.5.4 - Site 8 Zone of Theoretical Visibility [APP-073]** identifies that there is only limited intermittent visibility from this receptor

ID	Theme	Comments/Issues Raised	Applicant's Response
		the surrounding historic settlement and landscape. The absence of a dedicated viewpoint does not necessarily constitute an assessment deficiency in itself: the question is whether the available visual evidence is sufficient to understand the contribution made by setting to the significance of the church and the change to that contribution arising from Site 8.	and this is associated with Sub-Site 8B, as visibility of Sub-Site 8A is restricted by the intervening features of Great Wood and Little Wood.
WR-HE-037	Volume 1 Chapter 7: Landscape and Visual	3.30 The same issue arises in relation to the Shotesham Conservation Area. Given the Applicant's own identification of significant landscape and visual change within the surrounding Shotesham landscape, Chapter 10 should demonstrate that it has considered whether the rural valley, surrounding agricultural landscape and relevant spatial and visual relationships contribute to the significance of the Conservation Area, rather than limiting the assessment to visibility of Scheme infrastructure from within its boundary. 3.31 This is particularly important because the LVIA relies upon woodland and hedgerow planting to reduce some visual effects over time. Where such planting is relied upon in Chapter 10 as heritage mitigation, consideration should also be	The Applicant notes this comment regarding Shotesham Conservation Area. This heritage asset was scoped out at PEIR stage; however, further engagement with Historic England will address this in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		given to whether the resulting alteration to landscape character, openness or historic relationships would itself affect those aspects of setting which contribute to heritage significance. Reduced visibility of solar development should not automatically be taken to represent an equivalent reduction in effects upon heritage significance.	
WR-HE-038	Volume 1 Chapter 7: Landscape and Visual	3.32 Section 7.11 – Cumulative effects. Historic England notes the conclusion that no significant cumulative landscape or visual effects would arise. However, this does not necessarily establish the absence of cumulative effects upon heritage significance. Chapter 10 should therefore demonstrate that relevant developments have been considered where they have the potential to affect the same designated heritage asset or the same aspects of its setting.	The Applicant notes that **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** provides an assessment of cumulative effects upon heritage assets, within **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055]** providing an assessment of individual effects on particular receptors.
WR-HE-039	Volume 1 Chapter 7: Landscape and Visual	3.33 Section 7.12 – Conclusion. Historic England notes that Chapter 7 identifies long-term change to the rural landscape and significant adverse effects remaining at a number of locations after mitigation, including at Site 8 at Year 15. It also confirms that the National Grid Substation and established mitigation planting would	The Applicant notes that **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** includes a consideration of possible long-term effects on heritage assets during the operational phase of the Scheme, which has taken into account the continued growth and maturation of vegetation across the Scheme (include Site 8), as presented within **ES Chapter 7 – Landscape and Visual [APP-043].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		remain following decommissioning. These findings should be appropriately reflected in Chapter 10, including in relation to the duration and reversibility of effects upon the settings of designated heritage assets.	The Applicant refers to the response provided within WR-HE-028 regarding potential impacts related to decommissioning upon heritage assets.
WR-HE-040	Volume 1 Chapter 9: Water Environment	**Chapter 9: Water Environment** 3.34 Section 9.5.6 outlines the potential impacts that the proposed scheme may have on the water environment. Several of the issues cited could also impact the historic environment. For example, changes to the water environment could lead to waterlogged archaeological remains and deposits drying and/or becoming exposed to oxygen. This could lead to the degradation and/or loss of vulnerable organic archaeological and palaeoenvironmental remains.	As set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052]**, the Scheme comprises mostly of Solar PV Arrays which are raised up on narrow supports at a suitable freeboard above the ground/anticipated flood depths. Natural grass cover will be present beneath the panels, maintaining the existing hydrological regime. Surface water management measures are incorporated into the Scheme to ensure no increase in surface water flood risk within the Order Limits or elsewhere as secured within the **Design Principles, Parameters and Commitments [REP1-078].** As such, there are no significant changes to the hydrological regime across the Order Limits that would impact on vulnerable archaeological remains.
WR-HE-041	Volume 1 Chapter 9: Water Environment	3.35 In addition, the potential for new contaminants in surface water runoff during construction and decommissioning could impact the historic environment. Contaminants can impact buried archaeological remains by making sites	Surface water runoff and pollution management during the construction and decommissioning phases will be managed through the use of bunding, silt lagoons and filter drains and set out/secured

ID	Theme	Comments/Issues Raised	Applicant's Response
		inaccessible for further work due to health and safety issues. The presence of contaminants can also limit the scientific assessments that could be applied to archaeological remains in the future, such as radiocarbon dating. Historic England recommends that the potential impacts of contamination on heritage are considered, and that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to: https://historicengland.org.uk/images books/publications/land-contamination-and-archaeology/.	within the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**. The Applicant notes that potential impacts of bentonite (the drilling fluid used during HDD works) upon below-ground heritage assets has been included within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].** There are measures embedded into the **Outline CEMP [REP1-058]** to minimise the potential for outbreak, and it is not considered that bentonite poses any significant risk to below-ground archaeological remains. There are no know examples of bentonite outbreaks impacting archaeological remains, as stated within the Historic England Pile Impacts on Archaeology: Literature Review, undertaken by MoLA. This document further notes that bentonite is often the preferred choice of drilling fluid, as it is designed to not permeate the surrounding ground, and further notes that the pH level of bentonite is similar to that of water, preventing the chance of acidifying effects on soil.
WR-HE-042	Volume 1 Chapter 10: Cultural Heritage	Chapter 10: Cultural Heritage 3.36 Scope, baseline and assessment methodology. Historic England notes that the assessment considers direct effects upon archaeological remains and indirect effects upon the significance of heritage assets through changes within their	The Applicant welcome Historic England's support on the scope, baseline and assessment methodology presented within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		settings. We welcome the use of a 5km study area for Scheduled Monuments and Grade I and II* listed buildings, together with the flexible approach described at paragraphs 10.5.3–10.5.5 whereby heritage assets beyond the defined study areas may be considered where physical, historical or wider landscape relationships indicate this is necessary.	
WR-HE-043	Volume 1 Chapter 10: Cultural Heritage	3.37 We also welcome the recognition that the assessment of setting should concern the effect upon the significance of the heritage asset as a whole, rather than simply the effect upon a particular view. However, this distinction should be applied consistently when determining effects. In particular, the absence of a significant effect in EIA terms does not necessarily demonstrate the absence of harm to the significance of a designated heritage asset. The assessment itself illustrates this distinction in identifying a minor adverse effect upon Barn Cottages as less than substantial harm, notwithstanding that this is not significant in EIA terms.	The Applicant welcomes Historic England's support of the methodology of assessing the setting and significance of heritage assets.
WR-HE-044	Volume 1 Chapter	3.38 In relation to below-ground heritage, paragraph 10.5.7 identifies potential effects including direct construction	The Applicant refers to its response at WR-HE-041. The Applicant notes HE's comments regarding potential effects to the water environment and

ID	Theme	Comments/Issues Raised	Applicant's Response
	10: Cultural Heritage	impacts, vibration and changes to setting. However, it does not identify potential effects arising from changes to the water environment. This is relevant where HDD and other works may affect deposits with archaeological and palaeoenvironmental potential, including peat and other waterlogged deposits. Similarly, the baseline in section 10.6 should more clearly recognise the palaeoenvironmental potential of the Scheme area, alongside the known archaeological sites and finds.	palaeoenvironmental remains. **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** will be updated at Deadline 3 to include a more detailed description of the palaeoencironmental potential of the Scheme area, in regard to known archaeological sites and finds, in addition to the potential further requirements for palaeoenvironmental works to be carried out (where deemed necessary) within the Scheme.
WR-HE-045	Volume 1 Chapter 10: Cultural Heritage	3.39 Historic England therefore recommends that the Applicant clarifies the distinction between EIA significance and heritage harm throughout Chapter 10, and supplements the archaeological baseline and impact pathways to address archaeological and palaeoenvironmental remains potentially affected through changes to the water environment.	The Applicant notes this comment and will update **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and the relevant technical appendices as appropriate at Deadline 3 with the updated NPPF terminology and clarify the distinction between EIA significance and heritage harm; however, it is noted that these changes will not alter the conclusions reached within the cultural heritage assessments.
WR-HE-046	Volume 1 Chapter 10: Cultural Heritage	3.40 Embedded mitigation, heritage-led design and its securing. Historic England welcomes the evidence in section 10.7 that heritage considerations have influenced the spatial design of the Scheme through development exclusions and increased setbacks. These include substantial setbacks in relation to the	The Applicant welcomes Historic England's support of the embedded mitigation in regards to the identified Listed Buildings and Conservation Areas.

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		Grade I Church of St Michael and Fritton Conservation Area; removal of Site 6 from the built parameters; setbacks and exclusions associated with Saxlingham Green Conservation Area; and the reduction of development at Sites 8 and 9.	
WR-HE-047	Volume 1 Chapter 10: Cultural Heritage	3.41 We are also pleased to see that the potential effects of different root structures and planting types upon archaeology have been considered as part of the landscape mitigation at paragraph 10.7.8. Historic England notes, however, that paragraph 10.7.3 identifies construction effects including noise, vibration and visibility, but does not appear to address changes to the water environment. This should be considered where HDD or other works have the potential to affect waterlogged archaeological or palaeoenvironmental deposits. 3.42 Where the assessment relies upon these exclusions, setbacks or landscape measures, they should be demonstrably secured through the DCO and associated control documents.	The Applicant refers to its responses at WR-HE-041 and WR-HE-044.
WR-HE-048	Volume 1 Chapter	3.43 Landscape screening, setting and the assessment of operational effects. Historic England notes the substantial reliance placed upon landscape planting	The Applicant notes this comment.

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	10: Cultural Heritage	and visual screening in sections 10.7–10.10. The assessment recognises that operational setting effects can arise from changes to landscape character, visual intrusion, glare and noise, and that such effects may continue for the operational lifetime of the Scheme, although the Applicant anticipates that they would reduce as planting matures.	
WR-HE-049	Volume 1 Chapter 10: Cultural Heritage	3.44 As noted in our comments on Chapter 7, reduced visibility of the Scheme should not in itself be assumed to result in an equivalent reduction in harm to heritage significance. Where openness, agricultural character, historic landscape relationships, settlement form, or the prominence and experience of a listed building or Conservation Area contribute to its significance, new planting may itself alter the contribution made by setting. Landscape screening should therefore be demonstrated to be appropriate to the significance and setting of the relevant heritage asset rather than treated as inherently beneficial heritage mitigation. 3.45 This issue is particularly apparent at paragraph 10.8.29, where the Applicant identifies a minor adverse effect upon Barn Cottages, equating to less than	Impacts to landscape character and built-heritage assets by new hedgerow and tree planting have been considered as part of **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].** The Applicant notes that information regarding tree species to be utilised across the Scheme were provided to Historic England on 21 November 2025. Details of tree species are included in **ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment** [APP-150]**.** As stated within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** the species will be native, most comprising a mixture of shallow and deeper rooted species (to reduce potential for tree throws) and will avoid any species that have acidifying impacts upon the pH levels of soil. Full details will be secured by Requirement 7 of the **Draft DCO [REP1-014]**. In regards to the Grade II Listed Barn Cottages, it is noted that the cultural heritage assessments have identified, as noted by HE, a minor adverse effect at

ID	Theme	Comments/Issues Raised	Applicant's Response
		substantial harm at the lowest end of the scale, but states that this would reduce to no harm once landscape screening has matured, anticipated to take approximately 30 years. A period of approximately 30 years represents a substantial part of the operational phase and should not simply be treated as an interim condition. The residual-effects reporting should clearly distinguish effects before and after the maturation of mitigation and demonstrate that any eventual conclusion of "no harm" derives from an assessment of significance rather than visibility alone.	the lowest end of the scale, which would reduce to no harm once landscape screening has matured in c. 30 years. The Applicant notes that this conclusion has been derived based on potential residual effects upon the significance of Barn Cottages, part of which includes the elements of its setting which contribute to this significance. Having been assessed as 'minor adverse and the lowest end of the scale', it is noted that impacts upon both significance and setting will reduce as the vegetation matures.
WR-HE-050	Volume 1 Chapter 10: Cultural Heritage	3.46 There also appears to be an inconsistency in the assessment of Conservation Areas. Table 10-3 identifies Conservation Areas as Medium sensitivity receptors, whereas the later effects reporting appears to identify Fritton, Saxlingham Green and Brooke Conservation Areas as Low sensitivity. 3.47 Historic England requests clarification of this apparent inconsistency and recommend the applicant is asked to review their findings and then confirmation as to whether correction would alter any of	The Applicant notes HE''s comments regarding inconsistencies between Table 10-3 and the assessment of effects provided elsewhere within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].** This Applicant can confirm that Table 10-3, which identifies Conservation Areas as medium sensitivity receptors is correct, and that the subsequent conclusions have been reached with these assets being assessed as having medium sensitivity. The Applicant will update **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** to correct this inconsistency at Deadline 3; however, it is noted that

ID	Theme	Comments/Issues Raised	Applicant's Response
		the conclusions reached for the affected Conservation Areas.	this change will not alter the conclusions reached within the assessments.
WR-HE-051	Volume 1 Chapter 10: Cultural Heritage	3.48 Reasonable worst case, operational lighting and permanent infrastructure. Historic England welcomes the statement that the setting assessment has assumed solar infrastructure at its maximum permitted height. However, the reasonable worst case for heritage does not necessarily arise from maximum height alone. The siting, orientation and combination of Scheme components within the permitted parameters may also affect the relationship between development and a heritage asset. This is particularly relevant to substations, BESS infrastructure, pylons and other taller elements, and where Chapter 10 itself acknowledges that the effect upon a receptor may depend upon the eventual location of infrastructure within a parameter area.	The Applicant notes this comment.
WR-HE-052	Volume 1 Chapter 10: Cultural Heritage	3.49 We recommend the Applicant is asked to confirm that the assessment represents the reasonable worst case for effects upon heritage significance, taking account not only of maximum heights but also of the location and combination of	As stated within response WR-HE-016, the ES had been prepared on the basis of assessing the worst-case scenario. The Applicant refers to its comments at WR-HE-016 and WR-HE-018 for more details on this.

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		Scheme components within the permitted Rochdale Envelope.	
WR-HE-053	Volume 1 Chapter 10: Cultural Heritage	3.50 It is also not clear from Chapter 10 that potential effects from operational lighting have been considered as an aspect of setting. Chapter 4 identifies task/emergency and motion-activated security lighting associated with elements including substations, the National Grid Substation and BESS, while Chapter 10 identifies other operational setting effects including landscape change, visual intrusion, glare and noise. Where rural darkness and tranquillity contribute to the significance or experience of designated heritage assets, the Applicant should demonstrate that operational lighting would avoid or minimise harm and that appropriate controls are secured.	The Applicant refers to its comment at WR-HE-027.
WR-HE-054	Volume 1 Chapter 10: Cultural Heritage	3.51 Historic England does, however, welcome the recognition that the Scheme is not wholly reversible following decommissioning. The heritage assessment should maintain a clear distinction between temporary/reversible solar infrastructure and permanent elements including the National Grid Substation and pylons, and should not rely upon eventual reversibility when	The Applicant notes that this distinction has been made within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		considering effects arising from infrastructure that would remain.	
WR-HE-055	Volume 1 Chapter 10: Cultural Heritage	3.52 Archaeological impacts and additional mitigation. Historic England welcomes the commitment to further archaeological investigation, particularly in areas which have not yet been fully investigated, including the Cable Route Corridor. We are also pleased to see that the potential archaeological effects of bentonite slurry associated with HDD have been considered. 3.53 There is, however, an apparent contradiction at paragraph 10.8.4, which states that further assessment has confirmed that there is no potential for direct impacts upon non-designated heritage assets, whereas the subsequent assessment identifies construction impacts upon archaeological assets. This should be clarified.	The Applicant can confirm that paragraph 10.8.4 of **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** relates to no further potential for direct impacts upon non-designated built-heritage assets; potential direct impacts upon archaeological remains are addressed in the following paragraphs 10.8.6 – 10.8.13.
WR-HE-056	Volume 1 Chapter 10: Cultural Heritage	3.54 Historic England welcomes the range of archaeological mitigation identified in section 10.9, including further geophysical survey, informative trenching, geoarchaeological assessment where deep impacts are proposed, archaeological excavation, monitoring and preservation in situ. In applying this	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		strategy, particular attention should be given to deposits with palaeoenvironmental potential, including peat, alluvium and River Terrace Deposits identified elsewhere within the ES, and to the potential effects of HDD and any associated dewatering.	
WR-HE-057	Volume 1 Chapter 10: Cultural Heritage	3.55 The assessment should also address the implications of retained below ground infrastructure following decommissioning, including whether retained cables and foundations could constrain or affect the effectiveness of future archaeological geophysical survey. 3.56 Subject to these points, Historic England welcomes the proposed archaeological mitigation strategy and agrees with the principle of prioritising avoidance/preservation in situ where significant archaeological remains are identified.	The Applicant welcomes Historic England's support of the proposed mitigation strategy and the prioritisation avoidance/preservation in situ of significant archaeological remains. In regard to the retention of below-ground infrastructure, the Applicant refers to comment WR-HE-028.
WR-HE-058	Volume 1 Chapter 10: Cultural Heritage	3.57 Cumulative effects. Historic England considers that the reasoning in section 10.11 for excluding cumulative harm to designated heritage assets requires further justification. The assessment identifies developments which may affect heritage receptors also affected by the Scheme, including development	The Applicant notes this comment regarding the Grade I Listed Church of St Michael which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further engagement with HE will address this in more detail within the **Statement of Common Ground (SoCG) with Historic England [REP1-089]** at Deadline 3.

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		associated with the Grade I Church of St Michael. It nevertheless concludes that there is no potential for cumulative harm because the Scheme itself does not give rise to significant effects. The absence of a significant effect in EIA terms from East Pye when considered individually does not, by itself, demonstrate that changes associated with East Pye could not combine with those arising from another development to affect the significance of the same heritage asset. 3.58 This is particularly important given the distinction made elsewhere within Chapter 10 between EIA significance and heritage harm: an effect which is not significant for EIA purposes may nevertheless amount to less than substantial harm to the significance of a designated heritage asset. 3.59 Historic England therefore recommends that the applicant is asked to reconsider the cumulative assessment for shared heritage receptors, including the Grade I Church of St Michael. The assessment should consider the combined changes to the setting and significance of the heritage asset arising from the relevant developments, rather	

ID	Theme	Comments/Issues Raised	Applicant's Response
		than excluding cumulative harm principally on the basis that the effect of the East Pye Scheme considered in isolation is not significant in EIA terms.	
WR-HE-059	Volume 1 Chapter 16: Ground Conditions	Chapter 16: Ground Conditions 3.60 Palaeoenvironmental potential of superficial deposits (Table 16.5). This identifies the potential for organic deposits, such as peat, to be present in key areas. This includes Site 5, where Head has been recorded that can locally include lenses of peat, Site 7 where Alluvium has been recorded that can contain layers of peat, and the Cable Route Corridor where Head, Alluvium, River Terrace Deposits and peat have been recorded. All of these deposits have the potential to preserve evidence of how the landscape and environment changed over time, placing the archaeological sites into context. The River Terrace Deposits may also contain Palaeolithic archaeological remains. 3.61 Historic England recommends that the archaeological and palaeoenvironmental potential of these deposits is appropriately recognised in the assessment and in the design of subsequent investigation and mitigation.	The Applicant refers to its comments at WR-HE-020 and WR-HE-044.

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WR-HE-060	Volume 1 Chapter 16: Ground Conditions	3.62 Ground investigation and geoarchaeological assessment. Historic England notes that further ground investigation is proposed. Such investigation has the potential to help characterise and understand the sequence of deposits and their archaeological and palaeoenvironmental potential. 3.63 We recommend the applicant is asked to ensure that a geoarchaeologist is involved in designing the scope of this work and in assessing the results, to maximise the value of the information obtained. This is particularly relevant where peat, alluvium, River Terrace Deposits or other deposits with archaeological and palaeoenvironmental potential may be encountered.	The Applicant notes this recommendation and also refers to its comments at WR-HE-020 and WR-HE-044.
WR-HE-061	Volume 1 Chapter 16: Ground Conditions	3.64 Dewatering and preservation of waterlogged remains. Paragraph 16.7.2 identifies that temporary dewatering may be required. Historic England considers that it will be important to understand where dewatering may be necessary and the potential effect this could have upon the preservation of buried archaeological and palaeoenvironmental remains, particularly where peat or other	Prior to detailed design the requirement for any dewatering to be undertaken is unknown and Paragraph 16.7.2 of **ES Chapter 16 – Ground Conditions [APP-052]** includes mitigation for dewatering activities on a precautionary basis. Any requirement for dewatering will be defined as part of the detailed design of the Scheme. The detailed design of the Scheme will be informed by the post-consent ground investigation which will

ID	Theme	Comments/Issues Raised	Applicant's Response
		waterlogged deposits occur. This should include establishing whether peat is present in the areas proposed for HDD launch and reception pits. The potential effects of drying or other changes to the preservation environment should be considered with reference to Historic England's Preserving Archaeological Remains (2016).	seek to establish the geological and hydrogeological conditions at the locations of proposed trenchless crossings (noting that the design of the ground investigation will be undertaken post-consent). The Applicant notes this recommendation regarding the potential effects of drying and other changes to the preservation environment.
WR-HE-062	Volume 1 Chapter 16: Ground Conditions	3.65 Avoidance of peat deposits. Historic England welcomes the approach to mitigating the potential loss of peat soils principally through design. We also welcome the proposed use of trenchless approaches within the Cable Route Corridor and the commitment at paragraph 16.8.15 to avoid shallow trenching where this would disturb peat deposits. This approach is supported, subject to the archaeological and palaeoenvironmental potential of the deposits also being appropriately considered as part of the investigation and mitigation strategy. We recommend the applicant is asked to confirm this is the case.	The Applicant confirms this is the case and refers to its comments at WR-HE-020, WR-HE-040, and WR-HE-044.
WR-HE-063	Volume 2	3.66 Figures. Historic England has reviewed the relevant figures in Volume 2 alongside the corresponding	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Environmental Statement chapters and supporting appendices. The Indicative Masterplan (Figure 4.1), Landscape and Visual figures (Figures 7.1–7.10) and Cultural Heritage Figure 10.1 provide useful spatial context for understanding the relationship between the Scheme, the surrounding landscape and designated heritage assets. Our comments on the assessment, including viewpoints, ZTV evidence and embedded design mitigation, are set out under Chapters 4, 7 and 10 and the relevant Volume 3 appendices and are not repeated here. 3.67 Where the heritage assessment relies upon spatial exclusions, setbacks, planting or other design measures illustrated by these figures, Historic England considers that these should be consistently reflected in, and appropriately secured through, the DCO plans and other control documents.	
WR-HE-064	Volume 3 Appendix 7.2 and 7.3: Landscape Baseline and	3.68 Historic England notes that these appendices provide useful evidence regarding landscape characteristics which may contribute to the setting and significance of designated heritage assets, including openness, rural	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Landscape Assessment Tables	character, tranquillity, settlement pattern and the relationship between plateau and valley landscapes. Of relevance is Site 8, identified as a landscape of High value and High sensitivity, with a highly tranquil rural character and dark night skies, in proximity to Shotesham and Saxlingham Green. 3.69 The detailed assessment also identifies changes to rural character, tranquillity, openness and expansive skies arising from Scheme infrastructure, and acknowledges that mitigation planting may itself affect openness. This evidence should be appropriately reflected in the Cultural Heritage assessment where these characteristics contribute to heritage significance; reduced visibility through planting should not in itself be taken to demonstrate an equivalent reduction in harm.	
WR-HE-065	Volume 3 Appendix 10.1: Heritage Statement	3.70 Scope, information sources and relationship with the archaeological assessment. Historic England notes that the Heritage Statement principally assesses the significance and settings of designated and non-designated heritage assets potentially affected by the Scheme. The methodology identifies heritage	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3. However, the Applicant can confirm that the assessment of designated and non-designated heritage assets provided within this assessment focusses solely upon built-heritage assets, with below-ground

ID	Theme	Comments/Issues Raised	Applicant's Response
		assets through searches of the NHLE, local authority information, Conservation Area Appraisals and Neighbourhood Plans, supplemented by viewshed analysis, site visits and heritage-specific visualisations. The assessment subsequently scopes in 51 designated heritage assets and two non-designated heritage assets for detailed assessment. 3.71 We note that section 3.6 identifies the information sources consulted. Although geological information is subsequently provided within the individual Site assessments, it is not clear from this section whether British Geological Survey borehole records have been considered. Such records can provide valuable information regarding archaeological and palaeoenvironmental potential, particularly where trenchless/HDD approaches are proposed. Historic England recommends that section 3.6 clarifies whether BGS borehole records have been consulted. 3.72 Sections 3.26–3.28 also distinguish designated assets from non designated heritage assets, with Conservation Area Appraisals and Neighbourhood Plans used to identify the latter. As presently	archaeological remains assessed separately within **ES Volume 3, Appendix 10.2 - Archaeological Desk-based Assessment [AS-020 – AS-021].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		expressed, however, it is not entirely clear whether the non-designated heritage assessment within this appendix is intentionally focused upon historic buildings and other above-ground assets, with non-designated archaeological remains addressed principally through Appendix 10.2 and the other archaeological reports.	
WR-HE-066	Volume 3 Appendix 10.1: Heritage Statement	3.73 Historic England recommends that the applicant is asked to clarify the purpose and scope of Appendix 10.1, and that the relationship between the Heritage Statement and the separate assessment of non-designated archaeological and palaeoenvironmental remains is made explicit.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3.
WR-HE-067	Volume 3 Appendix 10.1: Heritage Statement	3.74 Historic England also notes that Table 3 does not identify any Scheduled Monuments within the study area for Sites 1, 3 and the BESS. Again, the applicant should clarify whether this reflects their absence from the relevant study area or their exclusion from the table.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3. However, the applicant can confirm that no Scheduled Monuments fall within 5km of Sites 1, 2 and BESS.
WR-HE-068	Volume 3	3.75 Approach to setting, visibility and heritage significance. Historic England welcomes the use of its setting guidance and the combination of desk-based research, viewshed analysis, site visits	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Appendix 10.1: Heritage Statement	and heritage-specific viewpoints, and notes that this work has influenced Scheme design. However, visibility is only one aspect of setting. Conclusions of "no harm" should demonstrably reflect the effect upon heritage significance, including where rural character, openness, historic land-use and settlement relationships or tranquillity contribute to significance, rather than principally the presence or absence of intervisibility.	
WR-HE-069	Volume 3 Appendix 10.1: Heritage Statement	3.76 Grade I and Grade II* listed buildings. Historic England welcomes the design changes made in response to the settings of the highest-grade listed buildings. For the Grade I Church of St Michael, the assessment expressly acknowledges that its rural setting contributes to its significance and that the southern fields of Sub-Site 4B contribute to the ability to appreciate that significance. Those fields have consequently been excluded from built development and retained as open land. This is a good example of heritage led avoidance and should be appropriately secured.	The Applicant notes this comment and welcomes Historic England's support of the design changes made in response to the setting and significance of the Grade I Listed Church of St Michael.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HE-070	Volume 3 Appendix 10.1: Heritage Statement	3.77 Similarly, the setback from the Grade I Church of St Catherine and Fritton Conservation Area represents an important design response. The Heritage Statement concludes that keeping built elements out of the church's immediate vicinity will retain its prominence and rural setting, particularly on the approach along The Street. Historic England welcomes that principle.	The Applicant notes this comment and welcomes Historic England's broad support of the design changes made in response to the setting and significance of the Grade I Listed Church of St Catherine and Fritton Conservation Area.
WR-HE-071	Volume 3 Appendix 10.1: Heritage Statement	3.78 For the Grade II* Old Rectory, however, the conclusion of no harm relies substantially upon the absence of views between the building and Site 4 and the approximately 500m separation from the nearest solar arrays. The assessment should be clear that this conclusion also reflects the significance of the Old Rectory and the contribution made by its wider rural and historic relationship with the Grade I church, rather than absence of visibility alone.	The Applicant notes this comment regarding the Grade II* Listed Old Rectory (NHLE 1373264) which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further engagement with HE will address this in more detail within the **Statement of Common Ground (SoCG) with Historic England [REP1-089]** at Deadline 3.
WR-HE-072	Volume 3 Appendix 10.1: Heritage Statement	3.79 There is a similar issue with the Grade II* Oaks Farmhouse. The assessment itself establishes that Sub-Site 7L forms part of the farmhouse's wider historic agricultural setting, acknowledges a former tenurial relationship and concludes that the Sub-	The Applicant notes this comment regarding the Grade II* Listed Oaks Farmhouse (NHLE 1170906) which was assessed in the **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. Further engagement with HE will address this in more detail within the **Statement of Common Ground (SoCG) with Historic England [REP1-089]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Site makes some contribution to significance. It then identifies a minor change arising from the solar arrays but concludes no harm, partly because new woodland will screen them after approximately 15 years. 3.80 Historic England considers that the assessment of Oaks Farmhouse should more clearly explain why the acknowledged change to land which contributes to the significance of this Grade II* listed building results in no harm, independently of the eventual screening of the solar arrays. It should also consider whether the proposed woodland planting itself alters the agricultural character of the setting which the assessment identifies as contributing to significance. We recommend the applicant reviews this assessment and provides clarification.	
WR-HE-073	Volume 3 Appendix 10.1: Heritage Statement	3.81 Conservation Areas and landscape mitigation. Historic England welcomes the use of setbacks and development exclusions around Fritton, Saxlingham Green and Brooke/Kirkstead Conservation Areas. In particular, the Heritage Statement acknowledges that open	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		agricultural land beyond these settlements can contribute to their setting. 3.82 There is nevertheless a recurring assumption that additional planting will necessarily improve the heritage outcome. The issue is especially clear at Saxlingham Green. Paragraphs 10.39–10.41 propose woodland, grassland and hedgerow planting and state that this will obscure the Scheme from the Conservation Area and "maintain the rural agricultural character and appearance". At the same time, the assessment acknowledges that presently open views westwards from the approach along Broaden Lane will be obscured by solar arrays, albeit with a setback retained closest to the Conservation Area. 3.83 Historic England welcomes the setback but we consider that the assessment should distinguish between screening the development and preserving the existing character of the setting. New woodland may be landscape mitigation while nevertheless changing an open agricultural relationship.	
WR-HE-074	Volume 3	3.84 The Brooke and Kirkstead assessment is more explicit in recognising that the rural backdrop of open fields is	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage**

ID	Theme	Comments/Issues Raised	Applicant's Response
	Appendix 10.1: Heritage Statement	identified in the Conservation Area Appraisal as an important element of setting. It concludes that the majority of the relevant land remaining open is sufficient to preserve the historic field pattern and relationship with the village. That reasoning is helpful, but should be applied consistently elsewhere. 3.85 Historic England therefore recommends that the applicant is asked to review the assessment of Conservation Areas distinguishes clearly between visual screening and conservation of those landscape characteristics which contribute to their significance, and that the relevant development exclusions and setbacks upon which the conclusions depend are appropriately secured.	**Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3.
WR-HE-075	Volume 3 Appendix 10.1: Heritage Statement	3.86 Site 8 and Shotesham. Historic England notes that the Heritage Statement scopes the majority of designated heritage assets within the Site 8 study area out of detailed assessment, including the Grade II* Church of St Mary at Shotesham and Shotesham Conservation Area. The separate Landscape Baseline identifies Site 8 as a highly tranquil rural landscape of High sensitivity and the Landscape	The Applicant notes this comment regarding the Grade II* Church of St Mary (NHLE 1050642) and Shotesham Conservation Area. These heritage assets were scoped out at PEIR stage; however, further engagement with Historic England will address them in more detail within the **Statement of Common Ground with Historic England** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Assessment identifies experiential change in the landscape between Shotesham and Saxlingham Nethergate. 3.87 Historic England therefore requests further explanation of the basis upon which the Grade II* Church of St Mary and Shotesham Conservation Area were scoped out. The assessment should demonstrate that this conclusion has considered the contribution made by the wider rural and valley landscape to the significance of these heritage assets, including relevant historic and spatial relationships, rather than relying principally upon direct intervisibility.	
WR-HE-076	Volume 3 Appendix 10.1: Heritage Statement	3.88 Cable Route Corridor and overall conclusions. Historic England recommends that section 15 cross-refers clearly to the archaeological assessment and mitigation strategy for these matters, including the potential for archaeological and palaeoenvironmental remains within areas affected by HDD and associated works. This would avoid expecting a built-heritage focused Heritage Statement to duplicate the archaeological DBA while still ensuring the historic environment implications of the CRC are comprehensively signposted.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and other relevant technical appendices at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		3.89 The overall conclusion at paragraphs 16.5–16.9 should be read with some caution. The Heritage Statement concludes that only Moulton Farmhouse and Barn Cottages would experience harm, with all other designated and non-designated heritage assets experiencing no harm. It also states that harm to Barn Cottages would reduce to no harm once screening matures, anticipated to take approximately 30 years. As set out in our Chapter 10 comments, 30 years is a substantial period of the operational phase and should not be treated simply as an interim condition. 3.90 Historic England recommends that the final conclusions clearly distinguish effects before and after landscape mitigation has matured and ensure that conclusions of "no harm" are based upon the effect upon heritage significance rather than visibility alone. This chapter therefor would need to be revised or the changes acknowledged.	
WR-HE-077	Volume 3	3.91 Guidance and information sources. Sections 2.37–2.45 outline the professional guidance consulted. Historic England notes that the Archaeology and Solar Farms Good Practice Guide (2026)	The Applicant notes that the DCO Application was submitted prior to the publication of the *Archaeology and Solar Farms Good Practice Guide*. The Applicant will update **ES Volume 3, Appendix 10.2 – Archaeological Desk-based Assessment [AS-**

ID	Theme	Comments/Issues Raised	Applicant's Response
	Appendix 10.2: Archaeological Desk-Based Assessment	has not been referred to and recommends that this is included. • Section 3 identifies the information sources consulted. It is not stated whether BGS borehole records have been considered, despite these records providing valuable information about the archaeological and palaeoenvironmental potential of an area. This information is particularly useful in areas where trenchless/HDD approaches have been suggested as part of the Scheme.	**020 – AS-021]** and other relevant technical appendices at Deadline 3.
WR-HE-078	Volume 3 Appendix 10.2: Archaeological Desk-Based Assessment	3.92 Archaeological and palaeoenvironmental potential. The discussion of known archaeological remains within the different Sites demonstrates that archaeological remains dating between the prehistoric period and the modern day are present within the Scheme area. These include potentially complex sites such as settlements, moated sites and cemeteries. 3.93 However, the discussion of buried archaeological remains focuses principally on artefactual and structural evidence and does not adequately address palaeoenvironmental evidence. This information would assist in understanding the potential of the different Sites to	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.2 – Archaeological Desk-based Assessment [AS-020 – AS-021]** and other relevant technical appendices at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		address questions concerning matters such as economy and trade, and how the landscape and environment may have changed over time.	
WR-HE-079	Volume 3 Appendix 10.2: Archaeological Desk-Based Assessment	3.93 Site-specific assessment of impacts. The discussion of potential impacts upon sub-surface archaeology repeats substantially the same text for each Site, including potential impacts from the BESS, PV modules, piles and Cable Route Corridor. 3.94 Historic England recommends that these sections are made site-specific, focusing upon the impacts arising from the particular Scheme elements proposed within each Site and the archaeological and palaeoenvironmental remains which may consequently be affected.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.2 – Archaeological Desk-based Assessment [AS-020 – AS-021]** and other relevant technical appendices at Deadline 3.
WR-HE-080	Volume 3 Appendix 10.3: Archaeological Geophysical Survey Report	3.95 Geophysical survey and alluvial deposits. Paragraph 1.2 states that a fluxgate gradiometer survey was undertaken across the proposed Site. Section 4.3 also identifies alluvium in areas to the north and south of the watercourses between Tasburgh and Hempnall. Historic England notes that alluvial deposits can mask archaeological	While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very useful in identifying the principal concentrations of archaeology, and there is no reason to believe the interpretation and reporting provided within **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]** is limited or inaccurate.

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		features and remains, and consequently magnetometry alone may not adequately characterise the archaeological potential of these areas. Alternative or complementary investigative techniques may therefore be required to characterise the deposits and evaluate their archaeological and palaeoenvironmental potential.	As outlined in **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Likewise, once the full details of the Scheme are known, the need for and scope of any geoarchaeological assessment will be agreed with both NCCHES and HE.
WR-HE-081	Volume 3 Appendix 10.5: Evaluation Trenching Report Geophysical Survey Report	3.96 1.5 states that evaluation trenching was carried out across nine of the ten Sites within the scheme. Historic England requests clarification as to why evaluation trenching was not undertaken within the tenth Site. Figure 2 also indicates that substantial areas, including the Cable Route Corridors, have not yet been investigated through trial trenching.	The Applicant notes that Solar PV Panels and associated infrastructure has been removed from Site 6, with the Site to be retained for BNG. As such, it was determined that archaeological evaluation was not required within Site 6. As noted within **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, there is commitment to carrying out further archaeological investigations across the Cable Route Corridor.
WR-HE-082	Volume 3	3.97 Mitigation hierarchy and research objectives. Historic England welcomes the preferred mitigation approach identified at section 2.1, which seeks to conserve	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Appendix 10.6: Archaeological Mitigation Strategy	buried archaeological deposits through avoidance of archaeological remains. 3.98 Section 2.3 identifies the Research Framework questions to which the Scheme could contribute. Several of these concern the development of robust chronologies. Historic England therefore recommends that our guidance Radiocarbon Dating and Chronological Modelling (2022) is referred to and that a chronological modeller is included within the project team to provide appropriate support and advice and to assist in developing the chronological model.	
WR-HE-083		3.99 Archaeological Guidance. Section 2.7 identifies the guidance which will inform the proposed archaeological work. The list does not include the relevant Historic England guidance relating to scientific sampling, scientific dating or geoarchaeology/deposit modelling. Historic England recommends that the relevant current guidance is incorporated, including that relating to: • environmental archaeology and geoarchaeology; • scientific dating;	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• human remains; • materials science and industrial processes; and • archaeological conservation.	
WR-HE-084	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.100 Further survey, Cable Route Corridor and geoarchaeology. Section 3.5 states that geophysical survey will be undertaken in areas which were not previously available for survey, including where necessary within the Cable Route Corridor. Historic England considers that geophysical survey will be necessary within the Cable Route Corridor to enable areas of archaeological potential to be identified and appropriate mitigation developed. This could include micro-siting the cable route to avoid areas of archaeological potential and thereby avoid impacts upon buried remains. 3.101 Chapter 16 identifies the potential for organic deposits, including peat, within the Cable Route Corridor. The choice of evaluation technique in these areas will need careful consideration because peat and alluvium can mask archaeological features and remains.	The Applicant notes that at the meeting between The Applicant and Historic England on 14 September 2026, it was stated that the geophysical survey across the Cable Route Corridor is currently ongoing, and the results of the survey thus far were shared with Historic England via email following said meeting. The Applicant notes the comments regarding potential for organic deposits across the CRC and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.
WR-HE-085	Volume 3	3.102 Historic England welcomes the commitment at section 3.7 to investigate	The Applicant notes this comment.

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	Appendix 10.6: Archaeological Mitigation Strategy	areas not previously subject to evaluation trenching post-consent. However, section 3.8 states that the need for geoarchaeological assessment will be agreed once the Scheme design has been finalised. Historic England considers that geoarchaeology and deposit modelling will be essential in areas subject to deep impacts, including piling and directional drilling, to characterise the deposits which will be affected and understand their archaeological and palaeoenvironmental potential.	
WR-HE-086	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.103 Written Schemes of Investigation and palaeoenvironmental sampling. Section 4 sets out the Fieldwork Methodology. Section 4.6 states that the Archaeological Contractor will read the Archaeological Mitigation Strategy. Historic England would additionally expect the Archaeological Contractor to prepare a Written Scheme of Investigation (WSI) for each package of archaeological work.	**ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** states that *"Detailed Project Designs will be supplied to NCCHES for approval prior to each stage of archaeological mitigation"*. These Detailed Project Designs will ultimately serve as Written Schemes of Investigation (WSI) for each package of archaeological works.
WR-HE-087	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.104 The WSI should provide a detailed, site-specific strategy building upon the overarching AMS and enable relevant specialists to develop appropriate scientific sampling strategies for the sites being investigated. This is consistent with	The Applicant notes this comment.

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		the CIfA Universal Guidance for Archaeological Excavation (2023).	
WR-HE-088	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.105 Sections 4.27–4.31 set out the palaeoenvironmental sampling strategy. Further detail is required concerning the approaches to be used, required sample sizes and sample density, and the types of remains to be assessed, for example plant remains, charcoal, insects and pollen. Although bulk and column samples are identified, other forms of specialist sampling should also be incorporated where appropriate.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.
WR-HE-089	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.106 The palaeoenvironmental strategy should identify the research questions to be addressed, linked to the overarching research questions for the individual site and the Scheme as a whole. It should also build upon the results of the evaluation excavations and provide sufficient detail to establish what work will be required post-consent/pre-construction and what will be expected of the Archaeological Contractor.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.
WR-HE-090	Volume 3	3.107 Historic England notes that section 4.31 refers to Environmental Archaeology (2011). This guidance was revised in 2025 and the current Environmental	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
	Appendix 10.6: Archaeological Mitigation Strategy	Archaeology (2025) guidance should be used.	
WR-HE-091	Volume 3 Appendix 10.6: Archaeological Mitigation Strategy	3.108 Human remains. Section 4.33 states that human remains will only be removed in exceptional circumstances. Historic England notes that The Role of the Human Osteologist in Archaeological Fieldwork (2018) advises that thorough archaeological evaluation normally requires excavation of burials to the base of the archaeological sequence within evaluation trenches. The proposed approach should therefore be reviewed against the relevant Historic England guidance.	The Applicant notes this comment and will update **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.
WR-HE-092	Draft DCO	4.0 Comments on draft DCO Order, Commitments Register, Outline Management Plans and Strategy Documents Draft Development Consent Order [APP/3.1] Article 2 – Interpretation 4.1 Historic England notes that the definition of "commence" excludes "permitted preliminary works". These	All permitted preliminary works (including intrusive archaeological surveys) must be carried out in accordance with the permitted preliminary works environmental management plan as prescribed by Requirement 13(1) of the **Draft DCO [REP1-014]**. The Applicant has prepared a **Permitted Preliminary Works Environmental Management Plan (PPWEMP) [EXAM/9.32]** that has been submitted at Deadline 2. The PPWEMP ensures that any permitted preliminary works that are capable of

ID	Theme	Comments/Issues Raised	Applicant's Response
		include intrusive archaeological surveys and other investigations, but also site clearance including vegetation removal and demolition of existing buildings and structures. 4.2 We recognise that archaeological evaluation and other preliminary investigations may need to take place before commencement. However, preliminary works capable of disturbing archaeological remains should remain subject to appropriate archaeological safeguards 4.3 We therefore recommend the Applicant is asked to confirm, the definition of preliminary works and confirms how such works would be subject to archaeological control and how they would be included in the Outline Archaeological Mitigation Strategy and any necessary Written Scheme of Investigation prior to their undertaking.	disturbing archaeological remains are subject to appropriate archaeological safeguards.
WR-HE-093	Draft DCO	Requirement 3 – Amendments to approved details 4.4 Requirement 3 provides a mechanism for amendments to certified documents and documents subsequently approved under the Requirements, subject	As stated in Requirement 3(2) of the **Draft DCO [REP1-014]**, the relevant planning authority is the body that must provide approval under this requirement.

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		principally to there being no materially new or materially different environmental effects. 4.5 Historic England considers that this should also ensure that amendments do not undermine heritage mitigation or design measures upon which the assessment of effects on the significance of heritage assets relies. Where a proposed amendment could materially affect such a measure, or otherwise affect the significance or setting of a designated heritage asset, appropriate consultation with the relevant heritage body should be secured.	Under Requirement 3(2) of the **Draft DCO [REP1-014]** the relevant planning authority must be satisfied that the approval is *"unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement."* When making an application for approval, paragraph 2(3) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to include a statement confirming whether there are likely to be any materially new or different environmental effects. Paragraph 2(1) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to submit a copy of any application for approval to any requirement consultee. Paragraph 1(1) specifically refers to requirement consultees being included in any applications made under Requirement 3. However, the relevant planning authority is also able to consult any other stakeholders as it considers appropriate. The Applicant does not consider it necessary to amend Requirement 3 to include reference to specific consultees.
WR-HE-094	Draft DCO	Requirement 5 – Detailed design approval 4.6 Historic England welcomes the use of the Design Principles, Parameters and Commitments [APP/7.18] to control the	The Work Nos. requiring detailed design approval pursuant to Requirement 5 are the works that constitute above-ground development that is not otherwise subject to approval elsewhere. For example, the details of any fencing is controlled by

ID	Theme	Comments/Issues Raised	Applicant's Response
		detailed design of the Scheme. We note, however, an apparent inconsistency between that document and Requirement 5 of the draft DCO.	Requirement 10 so it is not necessary to also include it in Requirement 5. The Applicant notes that Requirement 5 of the **Draft DCO [REP1-014]** was updated at Deadline 1 to refer to Work No. 4, 5 and 6.
WR-HE-095	Draft DCO	4.7 APP/7.18 states that the parameters and commitments contained in Tables 4.1–4.11 would be secured by Requirement 5. Requirement 5(1), however, applies the detailed design approval process only to Works Nos. 1, 2 and 3. It is therefore unclear to Historic England how the parameters and commitments identified in APP/7.18 for Works Nos. 4–11 are secured through Requirement 5.	The Applicant refers to its response in WR-HE-094.
WR-HE-096	Draft DCO	4.8 n This is of particular relevance to Works Nos. 4 and 5, which include the National Grid Substation and overhead grid connection infrastructure. These are substantial permanent elements of the Scheme and have the potential to affect the settings and significance of designated heritage assets.	The Applicant refers to its response in WR-HE-091.
WR-HE-097	Draft DCO	4.9 Historic England recommends that the Applicant is asked to clarify and, where necessary, amends the draft DCO to	The Applicant refers to its response in WR-HE-091.

ID	Theme	Comments/Issues Raised	Applicant's Response
		ensure that the relevant parameters and commitments in APP/7.18 for Works Nos. 4 and 5 are appropriately secured. This should include those controls relating to siting, layout, scale, appearance and landscape mitigation where these are relied upon in the assessment of effects on heritage significance.	
WR-HE-098	Draft DCO	Requirement 7 – Landscape and Ecology Management Plan 4.10 Historic England welcomes Requirement 7 as the mechanism for securing the landscape measures identified in the Outline LEMP, including planting relied upon as part of the heritage-led design response. We also welcome the commitment for final tree species selection to have regard to Historic England guidance concerning the effects of roots upon archaeology. Where separate development exclusions or setbacks are relied upon as heritage mitigation, their securing is addressed below in relation to the Commitments Register.	The Applicant notes the Consultee's response.
WR-HE-099	Draft DCO	Requirement 12 – Archaeology 4.11 Historic England welcomes Requirement 12 and the Archaeological	The Applicant notes that Historic England does not consider it to be necessary to be consulted upon routine archaeological investigations and for this reason the Applicant has not added them as a

ID	Theme	Comments/Issues Raised	Applicant's Response
		Mitigation Strategy, which together provide the principal mechanism for securing further archaeological investigation and mitigation. We particularly welcome the provision for detailed project designs to inform the scope of archaeological mitigation and for preservation in situ or archaeological excavation where significant remains would otherwise be adversely affected. 4.12 The Archaeological Mitigation Strategy establishes an appropriate role for Norfolk County Council Historic Environment Service in agreeing and monitoring the archaeological works. Historic England does not consider it necessary to be consulted upon routine archaeological investigations. However, provision should be made for consultation with Historic England where further investigation identifies remains which may be of national significance, or where proposed mitigation may affect archaeological remains within our statutory remit. 4.13 We recommend that this escalation mechanism is made explicit within the Archaeological Mitigation Strategy and appropriately secured through	consultee to Requirement 12, otherwise the relevant planning authority would be required to consult with them each time this requirement is discharged. The Applicant will update the Archaeological Mitigation Strategy at Deadline 3 to ensure that consultation with Historic England takes place where further investigation identifies remains which may be of national significance, or where proposed mitigation may affect archaeological remains within Historic England's statutory remit.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Requirement 12. The applicant should be asked to confirm this.	
WR-HE-100	Draft DCO	Requirement 21 – Decommissioning 4.14 Historic England notes that the decommissioning provisions do not apply to Works Nos. 4 and 5. We understand that this reflects the potential retention of the National Grid Substation and associated grid connection infrastructure. This reinforces the need for the permanent effects and relevant design parameters of those works to be adequately controlled at the detailed design stage. 4.5 Historic England welcomes the provisions within the Archaeological Mitigation Strategy requiring a Decommissioning Strategy to be agreed with Norfolk County Council Historic Environment Service and requiring decommissioning compounds to avoid areas sensitive in archaeological and designated heritage asset setting terms. These provisions should remain secured through the DCO.	The Applicant refers to its response in WR-HE-091 in respect of Work No 4 and 5. Mitigation measures for decommissioning works in archaeologically sensitive areas or a designated heritage setting are secured by Section 5.6 of the **Outline Decommissioning Environmental Management Plan [REP1-062]** and the **Environmental Statement Volume 3: Appendix 10.6 Archaeological Mitigation Strategy [APP-173]**, with particular reference to section 11. Both of these documents are secured by Requirements 21 and 12, respectively, of the **Draft DCO [REP1-014]**.
WR-HE-101	Draft DCO	Schedule 15 – Procedure for discharge of requirements	Please refer to the Applicant's response in ID WR-HE-099. No amendment to Requirement 12 is proposed.

ID	Theme	Comments/Issues Raised	Applicant's Response
		4.16 Historic England notes that Schedule 15 establishes the procedure for consultation where a body is expressly identified as a consultee under an individual Requirement. Any amendment made in response to our comments on Requirement 12 should therefore ensure that the corresponding consultation arrangements are appropriately reflected in Schedule 15.	
WR-HE-102	Draft DCO	Consents and Agreements Position Statement [APP/7.22] 4.17 Historic England notes the Consents and Agreements Position Statement [APP/7.22], including the Applicant's position that certain archaeological consents are not required separately where development consent is granted. We further note that no authorised development or other works are currently proposed within the boundary of a Scheduled Monument. We would not support any changes to the scheme which required works to a Scheduled Monument to be carried out under a DCO. 4.18 Subject to this clarification, and to our comments above concerning Requirement 12 and the Archaeological Mitigation Strategy, Historic England has	Please refer to the Applicant's response in ID WR-HE-099 regarding Requirement 12. No amendment to Requirement 12 is proposed. As set out in the **Consents and Agreements Position Statement [APP-217]**, section 33 of the Planning Act 2008 sets out that certain consents are not required where a DCO is required to authorise a project (as is the case for the Scheme). As noted by Historic England, no works are proposed in the boundary of a Scheduled Monument. However, Historic England's position on this point is noted.

ID	Theme	Comments/Issues Raised	Applicant's Response
		no further comments on the additional consents and licences identified in APP/7.22.	
WR-HE-103	Commitments Register	Commitments Register [APP/7.26] 4.19 Historic England notes that the Commitments Register [APP/7.26] identifies a number of heritage-led design measures relied upon in the Cultural Heritage assessment, including development exclusions and specific setbacks from designated heritage assets. These include the setbacks at Sites 3, 4, 5 and 7 and the removal of parts of Sites 6, 8 and 9 from the built parameters of the Scheme. 4.20 The Commitments Register is not itself a secured document. While it identifies the Outline OEMP as the securing mechanism for the operational heritage mitigation and elsewhere identifies the Design Principles, Parameters and Commitments as the securing mechanism for certain minimum offsets and buffers, it is not clear to Historic England how each of the specific heritage-led development exclusions and setbacks is secured through the DCO. We request that the Applicant is asked to identify the relevant mechanism for	The commitments listed in CCH4 of the **Commitments Register [AS-038]** and detailed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** are secured as follows: The acoustic fencing for the BESS is secured through the **Outline OEMP [REP1-060]** (DCO Requirement 14) and the **Design Principles, Parameters, and Commitments [REP1-078]** (DCO Requirement 5). Landscape mitigation measures such as linear native tree belts, hedgerows, native broadleaf woodland, and existing hedgerow reinforcement are secured through the **Outline LEMP [REP1-064]** (DCO Requirement 7). As noted in Chapter 2 of the Outline LEMP, the Green Infrastructure Strategy provides an overview of the environmental mitigation measures, both proposed measures and locations including retained features for enhancement. Proposed measures will be further detailed in the future iteration of the Green Infrastructure Strategy secured by the Outline LEMP pursuant to Requirement 7 of the DCO. The various setbacks implemented into the Scheme to mitigate archaeology and heritage impacts are

ID	Theme	Comments/Issues Raised	Applicant's Response
		securing these measures and, where necessary, is asked to amend the DCO or certified documents to ensure that those relied upon in the assessment are appropriately secured.	detailed within and secured by the **Outline OEMP [REP1-060]** (DCO Requirement 14). The maximum extent of the Scheme is also shown on and secured by the **Works Plans [REP1-005 and 006].**
WR-HE-104	National Policy	5.1 The principal National Policy Statements relevant to the historic environment in this case are the Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3). The National Planning Policy Framework (NPPF), revised in August 2026, is also relevant. The NPPF confirms that nationally significant infrastructure projects are determined in accordance with the Planning Act 2008 and the relevant National Policy Statements, together with any other matters which are relevant, which may include the Framework. 5.2 Section 5.9 of EN-1 addresses the historic environment. It recognises that the significance of heritage assets derives not only from their physical presence but also from their setting and requires the Applicant's assessment to describe the significance of affected heritage assets,	The Applicant notes Historic England's summary of the relevant policy requirements of EN-1 concerning the historic environment, including the need to assess the significance of heritage assets, the contribution made by their settings, cumulative effects, and any indirect effects arising from the Proposed Development. The Applicant considers that these matters have been appropriately addressed The Applicant considers that the matters identified by Historic England are appropriately addressed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and the supporting heritage assessment, including **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 to APP-168]**. In their Relevant Representation [**RR-0769]**, at (HE-001), Historic England has previously acknowledged that the Applicant has provided an appropriate assessment of the location, type and significance of designated and non-designated heritage assets and that heritage receptors have been considered in the design of the Scheme. In the **SoCG with Historic England [REP1-089]** (HE CH – 3) with HE (submitted at Deadline 1), HE states they broadly

ID	Theme	Comments/Issues Raised	Applicant's Response
		including the contribution made by setting. The assessment should also consider cumulative effects and impacts arising from noise, vibration, light and other indirect effects. 5.3 EN-1 requires the Secretary of State to identify and assess the particular significance of heritage assets which may be affected, including through development within their setting. Great weight should be given to the conservation of designated heritage assets, with greater weight given to more important assets. Any harm or loss of significance requires clear and convincing justification. Substantial harm to, or loss of significance of, assets of the highest significance, including Scheduled Monuments and Grade I and Grade II* listed buildings, should be wholly exceptional. 5.4 EN-1 also requires consideration of the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets and the contribution of their settings. In considering development affecting the setting of a designated heritage asset, appropriate weight should be given to the desirability of preserving	support the approach to the siting of the BESS (with 400kV substation) and National Grid Substation in Site 1. The Applicant remains committed to ongoing engagement with Historic England through the Statement of Common Ground process and will continue to consider any further comments provided during the Examination.

ID	Theme	Comments/Issues Raised	Applicant's Response
		those elements of setting which make a positive contribution to significance.	
WR-HE-105	National Policy	5.5 EN-3 is particularly relevant to the proposed solar development. It requires applicants to take account of historic environment assessments in the design of their proposals and to consider measures to conserve heritage assets in a manner appropriate to their significance, including effects upon views important to their setting. It recognises that, because significance can derive from setting, the scale, design and prominence of large-scale solar development require careful consideration.	The Applicant agrees with Historic England's summary of the relevant EN-3 policy requirements. These matters are addressed within **ES Volume 1, Chapter 10: Cultural Heritage [APP-046]** and the supporting Heritage Statement (**ES Volume 3, Appendix 10.1 [APP-165 to APP-168]**), which assess the significance of heritage assets, the contribution of setting to significance, and the potential effects of the Scheme on heritage assets and their settings.
WR-HE-106	National Policy	5.6 The National Planning Policy Framework (August 2026) introduces an updated framework for assessing effects upon heritage assets. Policy HE5 requires assessment to identify whether a proposal would have a positive effect, no effect, result in harm, or cause the total loss of the significance of a heritage asset. Where harm would arise, the degree of harm should be identified. HE5 also makes clear that it is the effect upon the significance of the heritage asset, rather than the scale of the development, which should be considered.	The Applicant notes this comment and agrees with the stated policy of the NPPF. It is further noted that the **Planning Statement [REP1-074]** was updated for Deadline 1 to reflect the changes to the NPPF.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HE-107	National Policy	5.7 Policy HE6 requires substantial weight to be given to the conservation of a designated heritage asset, with greater weight given to more important assets. Any harm to a designated heritage asset is a matter of considerable importance and weight and, where harm would arise, the effect upon the asset and its significance should be weighed against any public benefits resulting from the proposal. Substantial harm to, or total loss of, assets of the highest significance, including Scheduled Monuments and Grade I and II* listed buildings, should be wholly exceptional. 5.8 The Framework also provides that non-designated heritage assets of archaeological interest which the decision-maker considers to be of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets (footnote 64). This is relevant where further archaeological investigation identifies remains of such significance within the Scheme.	The Applicant notes and agrees with the stated policies of the NPPF.
WR-HE-108	National Policy	5.9 Historic England notes that the terminology used in the August 2026 NPPF differs from that used in EN-1 and	The Applicant notes this comment. The Applicant has updated the **Planning Statement [REP1-074],** and the **Policy Compliance Document**

ID	Theme	Comments/Issues Raised	Applicant's Response
		in parts of the submitted Environmental Statement. In this Written Representation we have therefore sought, where appropriate, to describe the effect of the Scheme upon the significance of the relevant heritage asset and the degree of any harm identified. References to "less than substantial harm" within the application documentation should be understood in the context of the policy framework applicable to that assessment; EN-1 continues to use that terminology.	**[REP1-076]** at Deadline 1, which acknowledge the changes in respect to the use of 'less than substantial harm' terminology in the new NPPF and the NPS; and the implications for the assessment of the Scheme against these policies.
WR-HE-109	Conclusion	**6.1** Historic England considers that the Environmental Statement provides a broadly adequate basis for the Examination of the Scheme's effects upon the historic environment. We welcome the extent to which heritage considerations have informed the Scheme design, including development exclusions and setbacks which reduce effects upon the settings of designated heritage assets. 6.2 Notwithstanding these positive design changes, Historic England has identified a number of matters that we recommend are clarified or resolved during the Examination. These principally concern the assessment of effects upon heritage significance through changes within	The Applicant notes Historic England's conclusion that the Environmental Statement provides a broadly adequate basis for the Examination of the Scheme's effects on the historic environment and welcomes its recognition of the heritage-led design approach adopted during the evolution of the Scheme, including the use of development exclusions and setbacks to reduce effects on heritage assets and their settings. The Applicant acknowledges the points raised by Historic England in this written representation, and where relevant and necessary, these points will be addressed through updates to **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]** at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		setting; the distinction between visual screening and mitigation of harm to heritage significance; the reasonable worst case and cumulative assessment; and the securing of heritage mitigation and design commitments relied upon in the Environmental Statement.	
WR-HE-110	Conclusion	6.3 In particular, Historic England requests that the Applicant demonstrates how the heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the DCO. The apparent inconsistency between Requirement 5 and the Design Principles, Parameters and Commitments should also be resolved, particularly in relation to the controls applying to the National Grid Substation and overhead grid connection infrastructure.	The Applicant notes this comment. Heritage-led development exclusions and setbacks relied upon in the Cultural Heritage assessment are secured through the design which is articulated in the **Works Plan [REP1-005 and 006];** Requirement 5 of the **Draft DCO [REP1-014]** requires the final details of Work No.s 1,2 3, and 4 to be approved by the local planning authority. The **Outline Operational Environmental Management Plan (OEMP) [REP1-060]** sets out set-backs and mitigation in respect of heritage assets at Table 3.6. A detailed OEMP is required to be approved under Requirement 14 of the **Draft DCO [REP1-014]**. Requirement 5 in the **Draft DCO [REP1-014]** was updated and submitted at Deadline 1 to include that details relating to Work No.4 (National Grid Substation) would require approval prior to commencement of development; and Works Nos. 5 and 6 (works to connect to the overhead line) must be carried out in accordance with the **Design**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Principles Parameters and Commitments [REP1-078].
WR-HE-111	Conclusion	6.4 Historic England welcomes the archaeological mitigation framework provided through Requirement 12 and the Archaeological Mitigation Strategy. Subject to the detailed matters identified in this Written Representation, we consider that this provides an appropriate basis for further archaeological investigation and mitigation, with provision for Historic England's involvement where remains of potential national significance or matters within our statutory remit are identified.	The Applicant notes this comment.
WR-HE-112	Conclusion	6.5 Historic England will continue to engage with the Applicant and relevant local authorities during the Examination with the aim of resolving the outstanding matters identified in this Written Representation. Where matters are agreed, these will be recorded in the Statement of Common Ground being prepared with the Applicant.	The Applicant welcomes Historic England's continued involvement in the Examination process.

2.2 Natural England

Table 2.2 Applicant's Response to Natural England [REP1-189]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NE-001	General Remarks	Natural England (NE) is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	The Applicant notes this comment.
WR-NE-002	General Remarks	These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS), ancillary infrastructure, customer substations and Grid Connection Infrastructure (including a new National Grid Substation). Submitted by East Pye Solar Limited to the Secretary of State.	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NE-003	General Remarks	Natural England's full detailed comments on this application can be found in our Relevant Representations (our ref 547242, dated 10 June 2026), which were 'front-loaded' to ease engagement through examination. As a result, the contents of this letter are intended to summarise updates to our advice, without repetition of the advice already provided. Where no update is provided, our previous advice should be relied upon in our Relevant Representations.	The Applicant notes this comment and appreciates NE's engagement throughout the examination process. Positive engagement with NE has continued throughout the examination process. The SoCG with NE **[REP1-091]** was submitted at Deadline 1 and outlines both engagement with NE and matters of discussion. The Applicant's Response to NE Relevant Representation can be found in **The Applicants Response to Relevant Representation Part 2 - Statutory Bodies, Undertakers and Notable Parties [PDA-009].**
WR-NE-004	Engagement	Ongoing engagement between Natural England & the Applicant: The Applicant has engaged with Natural England since submission of our Relevant Representations on the Applicant's draft Statement of Common Ground (SoCG) which is expected to be submitted at Deadline 1. This SoCG should clearly set out both where Natural England and the Applicant have agreed matters, and where matters remain under discussion. Natural England will continue to work with the Applicant to update the SoCG throughout the Examination.	The SoCG with NE **[REP1-091]** was submitted at Deadline 1 and outlines both engagement with NE and matters of discussion.
WR-NE-005	Ecology and Biodiversity	Summary of Updated Advice:	Engagement with Natural England is ongoing and the position of both parties is set out within the submitted Statement of Common Ground **[REP1-091],** which was

ID	Theme	Comments/Issues Raised	Applicant's Response
		In our Relevant Representations, Natural England did not raise any 'Red' fundamental concerns but did identify outstanding 'Amber' items. The following provides a summary of progress in relation to these items: I. Protected species licenses Natural England acknowledges the Applicant's current position that they don't consider there to be a requirement for protected species licences. Natural England have advised that should the project design change or should any pre-commencement works change the ecological baseline, we advise engaging with the Natural England licencing team at the earliest opportunity to prevent delay. We have referred the Applicant to Natural England's guidance Wildlife licences: when you need to apply (Natural England and Defra, 25 October 20231 . The applicant can use our Discretionary Advice Service (DAS) to apply for a draft license if required.	provided at Deadline 1 and records the matters discussed to date and areas of ongoing engagement. Further engagement and agreement will be outlined in the SoCG at Deadline 3.
WR-NE-006	Soils	II. Soils Natural England consider there to be a number of outstanding matters relating to soils, that remain under discussion with the Applicant. Natural England's position remains that an Agricultural Land	This comment is noted and the applicant notes that this point is under discussion. The Applicant notes that an ALC survey has not been undertaken for the Cable Route Corridor (CRC) at this stage, as the CRC currently encompasses a broad area of

ID	Theme	Comments/Issues Raised	Applicant's Response
		Classification (ALC) survey needs to be undertaken for the entirety of the Draft Order Limits prior to determination. Natural England advise that detailed ALC surveys should be undertaken across all areas that may be affected by the Scheme, including the Cable Route Corridor (CRC), in order that potential effects on the agricultural land resource can be appropriately assessed and considered prior to determination of the application.	land. An ALC survey will be undertaken once the corridor has been refined to a working-width corridor prior to construction, with the findings informing the detailed Soil Resource Management Plan (SRMP). It is the applicants position that the ALC of the CRC will be undertaken pre-construction, once the cable route has been refined to a specific alignment within the CRC. The deferral of ALC and soil surveys in cable route corridors has been accepted by Natural England and the Secretary of State on other solar NSIPs. For example: 1. EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the CRC survey can be controlled under the DCO; 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. 3. EN010170 Green Hill where the ExA report at 3.3.5 notes that ALC of the CRC will be completed post-consent. Natural England's initial position was that an ALC of the CRC was required [REP1-182], but the Statements of Common Ground considered that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			assessment was appropriate and proportionate, with ALC of the CRC held for post-DCO survey. For the CRC, there will be limited impact from the works on agricultural land and soils. The works to install the cabling will take place over narrow strips of land and will be of short duration. The works will be carried out in accordance with the detailed SRMP which will be submitted and approved by the relevant planning authority, as secured by Requirement 18 in the **Draft DCO [REP1-081].**
WR-NE-007	Soils	Natural England agrees that, in principle, trenchless installation is the preferred approach where peat soils are present. Natural England's position is that any final design should demonstrate that the crossing would not adversely affect groundwater connectivity, hydrological function or the condition of the peat resource. Subject to appropriate evidence and detailed design demonstrating these outcomes, Natural England has no in-principle, objection to the proposed approach.	The Applicant notes and welcomes the acceptance in-principle to the approach for trenchless crossings.
WR-NE-008	Soils	The assessment methodology within the Soils and Agricultural Land chapter does not fully reflect the principles set out within current ISEP "A New Perspective on Land and Soil in EIA" (2022) guidance,	The Applicant notes that this point is under discussion within the SoCG with NE. The Applicant has presented the assessment of effects in **ES Volume 1, Chapter 15: Soils and Agricultural Land**

ID	Theme	Comments/Issues Raised	Applicant's Response
		particularly in relation to the assessment of effects on Best and Most Versatile agricultural land. Table 3 of the 2022 ISEP guidance continues to use the established 5ha and 20ha BMV land loss significance cut-offs as previously published in the 2019 Design Manual for Roads and Bridges LA109 and ICE EIA Handbook, 2019. Natural England notes that the assessment methodology presented within the Soils and Agricultural Land chapter adopts bespoke sensitivity and magnitude criteria.	**[APP-051]**, which identifies and assesses the potential effects of the Proposed Development on agricultural land and soils. Temporary, long-term temporary and permanent land take assumptions are set out within the chapter, including the assessment of effects on BMV agricultural land associated with mitigation planting. Natural England's position is that the development should be assessed against the criteria set out in the Institute of Sustainability and Environmental Professionals (ISEP) Guide "A New Perspective on Land and Soil in Environmental Impact Assessment" (February 2022). Under the ISEP guide Subgrade 3a and Grades 1 and 2 are separated, providing two levels of sensitivity, High and Very High. During the scoping for the Scheme Grades 1, 2 and Subgrade 3a were combined to form the high sensitivity receptor for agricultural land quality, as is further explained in the **ES Volume 3: Appendix 2.1 – EIA Scoping Report [APP-113]**. The ISEP Guide sets out that temporary effects are of minor magnitude in Table 3. This has been reflected in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051].**
WR-NE-009	Soils	Natural England also notes that temporary and reversible impacts are generally categorised as low magnitude, irrespective	The Applicant disagrees with Natural England's position for the following reasons. Temporary impacts are assessed based on whether or not they are capable of

ID	Theme	Comments/Issues Raised	Applicant's Response
		of scale or duration. Natural England therefore considers that further justification should be provided to demonstrate that the assessment methodology appropriately reflects the sensitivity of affected agricultural land and soil resources and magnitude of impact and does not understate the significance of effects.	being reversed (in which case they are temporary) or whether they can result in a permanent impact (in which case they are permanent). This is identified in **ES Chapter 15 [APP-051]** at paragraph 15.5.19, which quotes from the ISEP Guide to establish this distinction. Section 15.8 of ES Chapter 15 works through each of the main construction components and determines whether these have no effect, a temporary but reversible effect, a temporary effect but which is not fully reversible, or a permanent effect. Table 15.14 sets out the areas by ALC grade which are affected by whether they are reversible or (worst case) non-reversible (where ALC grade may be downgraded). The ES therefore does not understate the effects. By including a "worst-case" category it potentially overstates the effects. The Applicant welcomes continued engagement with Natural England on this, of which has been set out within the submitted Statement of Common Ground **[REP1-091]**, at Deadline 1. The Applicant will continue to engage with Natural England and will submit an updated SoCG reflecting the discussions at Deadline 3.
WR-NE-010	Soils	Natural England accepts that the Applicant has provided evidence demonstrating that agricultural land quality has contributed to	The Applicant notes that some fixed infrastructure is located on land graded as Grade 2. Constraints such as proximity to the Point of Connection (PoC) were

ID	Theme	Comments/Issues Raised	Applicant's Response
		site selection and design development and therefore agrees that avoidance and minimisation of BMV land has been considered throughout preparation of the Scheme. Nevertheless, Natural England remains concerned regarding the extent of permanent BMV land affected by fixed infrastructure and maintains that greater clarity should be provided regarding the balance that was applied between agricultural land quality and other site selection constraints, particularly in relation to those infrastructure elements proposed on Grade 2 agricultural land.	considered when siting the fixed equipment such as the National Grid Substation and Overhead Line works. Information regarding the site selection process is provided within the **Site Selection Assessment [APP-215]** and **ES Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041].** In addition, the Applicant has provided responses to the **Examining Authority's Written Questions 1 (ExQ1) [PD-006]** Q1.2.3 and Q1.3.2 in **The Applicant' s Response to the Examining Authority's First Written Questions [REP1-083]**, which sets out the factors taken into account in site selection (including agricultural land quality) and the relevant policy provisions in EN-1 and EN-3 relating to this. It is noted that NE has a preference for infrastructure to be sited on land of poorer quality where practical and possible. The Site Selection Assessment explains the constraints and operational benefits of siting the fixed infrastructure such as the BESS in close proximity to the PoC. All fixed infrastructure has had micro-siting applied 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NE-011	Soils	Natural England welcomes the commitment to prepare a detailed Soil Management Plan prior to commencement of works and notes that the Outline Soil Resource and Management Plan follows recognised soil management good practice. Further detail should be provided within the detailed Soil Management Plan regarding the results of the Cable Route Corridor soil and ALC surveys, restoration criteria, monitoring and verification requirements, stockpile management and any peat-specific management measures where relevant.	The results of the detailed soil and ALC survey of the CRC will feed into the detailed SRMP which is secured by requirement 18 of the **Draft DCO [REP1-014]**. The final SRMP must be approved by the relevant planning authority and must be implemented as approved.
WR-NE-012	Ecology	III. Local Nature Recovery Strategy (LNRS) Natural England have advised that the Applicant provides clarification on where the LNRS has been considered in supporting documents, in particular Chapter 8 Biodiversity and Ecology [APP-044] and in the Biodiversity Net Gain Report [APP-218].	Whilst there was no legislative requirement for the Scheme to provide BNG at the time of submission, the Applicant included a commitment to a minimum of 10% BNG through Requirement 9 of the **Draft DCO [REP1-014]**. The commitment is for the following BNG percentages • +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

ID	Theme	Comments/Issues Raised	Applicant's Response
			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. The Applicant has therefore taken the opportunity to enhance biodiversity and deliver a measurable net gain for nature. This includes the calculation of habitat baseline values and post-construction values provided within the **Biodiversity Net Gain Statutory Metric [APP-219].** Whilst the Schemes design evolution progressed prior to the publication of the Norfolk LNRS which was adopted in November 2025, the embedded design principles adopted and detailed within **Design Principles, Parameters and Commitments [REP1-078]** have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059].** This not only contributes towards a quantifiable BNG, but also helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219].**
WR-NE-013	Ecology	We offer the following additional comments on nature recovery for consideration. In addition to ensuring that	The project to deliver Biodiversity Net Gain greater than 10% as presented in the **Biodiversity Net Gain Report [APP-218]** and supported by the **Biodiversity Net Gain**

ID	Theme	Comments/Issues Raised	Applicant's Response
		adverse effects from the project proposals to the various ecological and landscape receptors are avoided, mitigated and/or compensated for in the short-medium term (i.e. throughout construction, operation and removal of temporary works), Natural England advises that a project of this scale should also commit to providing a positive long-term environmental legacy for Norfolk. We note that the Applicant acknowledges within the consultation documents (Chapter 14, Socio Economics, March 2026) that there are social and economic benefits to the scheme through working with local businesses and creating employment. Following a similar principle, we advise that the Applicant should commit to leaving a similarly positive environmental legacy which provides ecological and landscape benefits to people and wildlife in the long-term. This approach should complement and expand on the commitment for the project to provide 10 % Biodiversity Net Gain (BNG) when considered against the current baseline ecological value of the land within the red line boundaries of the project. Projects of this scale can and	**Statutory Metric [APP-219]**. This is secured through Requirement 9 of the **Draft DCO [REP1-014]**. The Applicant's commitment is to BNG as secured through Requirement 9 of the DCO. Notably, this aligns with the threshold set out in the latest BNG guidance for NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026. The assessment of beneficial effects provided within **Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** considers the habitat provision / enhancement / retention measures provided within the Green Infrastructure Strategy when considering the benefits to biodiversity and green infrastructure connectivity. The **Biodiversity Net Gain Report [APP-218]** illustrates that in practice, based on the **Green Infrastructure Strategy [AS-005]** (as secured within **the Outline LEMP [REP1-064]**), the Scheme will deliver BNG in excess of 10% BNG. In Requirement 9 of the **Draft DCO [REP1-014**] the Applicant has committed to the following BNG percentages: • +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

ID	Theme	Comments/Issues Raised	Applicant's Response
		should make a major contribution to local nature recovery in line with the Lawton principles of 'more, bigger, better and more joined up' habitats in the area. We advise that habitats and species measures within the Landscape and Ecology Management Plan should be aligned with the published Norfolk Local Nature Recovery Strategy2 .	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-NE-014	Ecology	IV. Biodiversity Net Gain Natural England welcomes the demonstration of biodiversity net gain and notes that a minimum of 10% biodiversity net gain in habitat, watercourse and hedgerow units is proposed to be secured through the Development Consent Order.	The Applicant welcomes this comment. Where possible, a 10% net gain for habitats, hedgerows and watercourses has been exceeded to further the overall biodiversity uplift of the Order Limits.
WR-NE-015	Arboriculture	V. Ancient Woodland and Veteran Trees Natural England advise that our standing advice, Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Natural England and Forestry Commission, 14 January 2022) 3, is adhered to in the OLEMP (APP-199), OCEMP (APP-196) and ODEMP (APP-198). Natural England acknowledge and welcome the implementation of a 30m buffer zone around veteran trees but for clarity and consistency of use, ask that it is	The Applicant notes this comment. The buffer zone applied for ancient or veteran trees is 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater as set out in the **Design Principles, Parameters and Commitments [REP1-078]** in accordance with Natural England and Forestry Commission 'standing advice'.

ID	Theme	Comments/Issues Raised	Applicant's Response
		referenced and secured in the LEMP DEMP and CEMP.	
WR-NE-016	Development Consent Order	VI. Development Consent Order (DCO) Natural England acknowledge the Applicant's response to the comments made in our Relevant Representations on the DCO. We will continue to work with the Applicant on the refinement of the relevant management plans that will be secured through the DCO.	Engagement with Natural England is ongoing and the position of both parties is set out within the submitted **Statement of Common Ground with Natural England [REP1-091]**, which was provided at Deadline 1 and records the matters discussed to date and areas of ongoing engagement. We will continue to work with NE and provide an updated SoCG at Deadline 3.
WR-NE-017	ExA's First Written Questions	Examiners First Written Questions Natural England has provided comments in relation to the Examining Authority's First Written Questions in a separate document named, EN0110014-000638-Examining Authority Written Questions, Natural England Comments (our ref 560171), and refers the Examining Authority to that submission.	The Applicant notes this comment.

2.3 Mills & Reeve LLP on behalf of National Gas Transmission plc

Table 2.3 Applicant's Response to National Gas Transmission Plc [REP1-398]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NGT-001	General Remarks	1.1 This written representation ("Representation") is submitted on behalf of National Gas Transmission plc ("NGT") in response to the application by East Pye Solar Limited ("Applicant") for the East Pye Solar Development Consent Order (the "Order") for the construction of the East Pye Solar Project (which will comprise a solar farm and battery energy storage system with associated infrastructure) defined in the draft Order (as submitted to the ExA in July 2026 [REF AS-032] (the "Draft Order")) as the "Authorised Development" and referred to herein as the "Project").	The Applicant notes this comment. A **Statement of Common Ground with National Gas Transmission [REP1-092]** was submitted at Deadline 1.
WR-NGT-002	NGT Infrastructure	2.1 As set out in NGT's relevant representation dated 9 June 2026 [REF RR-1407], NGT has an asset that forms an essential part of the national gas transmission network that falls within and in close proximity to, the Order limits. Namely, Feeder Main – FM05 – Yelverton to Stowmarket which is a high-pressure gas transmission asset (shown by a blue line on the plan at Appendix 1 (the "NGT	The Applicant refers to its responses NGT-001, NGT-002, and NGT-003 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
		Assets Plan") together with associated apparatus (including Cathodic Protection Groundbeds/Transformer Rectifier(s)) (the "NGT Assets") (plots: 16-003, 16-004, 15-009, 11 036, 06-003, 06-002, 05-049, 06-001 and 05-048). 2.2 Any interference with, damage to, or restriction of access to the NGT Assets would present an unacceptable risk to public safety and network integrity. Therefore, in respect of the NGT Assets (and any other NGT infrastructure located within the Order limits or in close proximity to the Project), NGT requires protective provisions ("Protective Provisions") to be put in place to ensure that: a) all NGT interests and rights, including rights of access to the NGT Assets and any other NGT apparatus, are unaffected by powers of compulsory acquisition, temporary possession, and the grant and/or extinguishment of rights as set out in the Order; and b) appropriate protection for the NGT Assets and any other retained apparatus is maintained during construction, throughout operation of the Project and in relation to	

ID	Theme	Comments/Issues Raised	Applicant's Response
		decommissioning of the same in accordance with the Protective Provisions, and the relevant safety standards as set out below.	
WR-NGT-003	Protective Provisions	2.3 NGT is disappointed that the Applicant has not engaged with NGT on the abovementioned Protective Provisions. NGT is aware that the Applicant is separately promoting the Lime Down Solar Project ("LDS Project"), and understands that the Applicant's intention is that the form of protective provisions currently under negotiation in respect of that project ("Lime Down PPs") will be mirrored for the purposes of the Project. NGT would note that the Lime Down PPs were not in agreed form at the close of the examination of the LDS Project, and that the Lime Down PPs that were included on the face of the final draft of the LDS Project order are themselves deficient in a number of material respects. 2.4 The form of Protective Provisions presently included within the Draft Order are also deficient in a number of regards and as such, are not acceptable to NGT. Consequently, NGT must therefore maintain its objection to the Order until the	The Applicant refers to its responses NGT-001 and NGT-003 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]**. As noted in the Applicant's previous responses, the Applicant will engage with NGT to agree the form of Protective Provisions which are suitable for this Scheme. Since Deadline 1, progress has been made on Lime Down PPs and the Applicant remains hopeful that protective provisions can be agreed for this Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		matter of the Protective Provisions is resolved to NGT's satisfaction.	
WR-NGT-004	NGT Regulatory Framework and Property Issues	3.1 Relevant guidance in respect of standards and protocols for working in the vicinity of high pressure gas pipelines applies in the form of the National Gas Transmission Guidance for Safe Working in the vicinity of High Pressure Pipelines T/SP/SSW/22 which is aimed at parties carrying out work in the vicinity of high pressure gas pipelines and associated installations and is provided to ensure that those planning and undertaking work take appropriate measures to prevent damage to those pipelines/installations. 3.2 The requirements in T/SP/SSW/22 are in accordance with IGEM (Institution of Gas Engineers and Managers) technical standard IGEM/SR/18 Edition 3 – Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations and HSE's guidance document HS(G) 47 Avoiding Danger from Underground Services. 3.3 Due to the interaction between the NGT Assets and the Project (as shown on the NGT Assets Plan) there is a significant risk of increased electrical interference with transmission pipelines, traffic loading	The Applicant refers to its responses NGT-001 and NGT-003 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],** BEPS-453 and BEPS-456 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**, and SNPC-019 in **The Applicant's Response to Relevant Representations Part 4 -Parish and Town Councils, and Parish Meetings [PDA-011]**. the Applicant notes NGT's requests for specific electrical impact assessments and will discuss the matter through the Statement of Common Ground process.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and pipeline vibrations during construction of the Project. These significant risks have the potential to result in safety limits being breached. 3.4 NGT therefore requires specific electrical impact assessments to fully evaluate the risks posed by the Project.	
WR-NGT-005	Property Issues	4.1 Maintaining necessary and appropriate property rights in relation to the NGT Assets, to ensure the safety and integrity of the gas transmission network, and protecting those rights from compulsory acquisition and/or interference, and/or overriding or extinguishment pursuant to the Order, is a fundamental concern for NGT. 4.2 Insufficient property rights would have the following safety implications for the NGT Assets: (a) inability for qualified personnel to gain access to the NGT Assets for the purpose of their inspection, maintenance and repair; (b) risk of strike to the buried NGT Assets if development occurs within the NGT easement zone (which is shown shaded green on the NGT Assets Plans) which	The Applicant refers to its responses NGT-001, NGT-002, and NGT-003 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]** and Number 36 in **Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		seeks to protect such buried Assets; and (c) risk of inappropriate development within the vicinity of the NGT Assets, thereby increasing the risk of unacceptable electrical interference with transmission pipelines (which may be continuous and cumulative, requiring compliance with applicable standards, protective controls, and monitoring which must be in place for the full operational life of the development to ensure ongoing pipeline integrity and statutory compliance), the risk of damage to the Assets and to the integrity of the gas transmission network as a whole.	
WR-NGT-006	Protective Provisions	4.3 NGT requires its standard form of Protective Provisions (the "NGT Protective Provisions") (which have been commercially assessed and deemed necessary for the adequate protection of NGT's Assets) to be included on the face of the Order to ensure that the NGT Assets and associated property interests are adequately protected, and to ensure compliance with relevant safety	The Applicant refers to its response to WR-NGT-003.

ID	Theme	Comments/Issues Raised	Applicant's Response
		standards. We include a copy of the NGT Protective Provisions at Appendix 2.	
WR-NGT-007	Protective Provisions	5.1 NGT seeks to protect its statutory undertaking by insisting that, in respect of connections and work in close proximity to its apparatus (including but not limited to the NGT Assets) as part of the Project, the following procedures are complied with by the Applicant: (a) NGT controls the plans, methodology and specification for works within 15 metres of any apparatus (or any works which may in any way adversely affect any such apparatus); and (b) works in the vicinity of NGT's apparatus, are not authorised or commenced unless Protective Provisions are in place preventing compulsory acquisition of NGT's land or rights or the overriding or extinguishment of, or other interference with, the same. Any acquisition of rights must be subject to NGT's existing interests and rights and must not contradict with or cut across such rights,	The Applicant refers to its response to WR-NGT-003. The protective provisions included in Part 5 of Schedule 14 of the **Draft DCO [REP1-014]** already include a requirement to obtain NGT's approval before carrying out works within 15m of any apparatus or which may in any way adversely affect any such apparatus. The protective provisions also include restrictions on the use of compulsory acquisition powers in respect of NGT's interests.

ID	Theme	Comments/Issues Raised	Applicant's Response
		including pipeline easements restricting development.	
WR-NGT-008	Protective Provisions	5.2 In particular, NGT has concerns arising from the nature of the Project as solar photovoltaic installations can cause significant risk to the NGT Assets (see Appendix 3 in this regard) and appropriate steps must be taken to ensure that these are mitigated. The identified risks arising from the Project include electrical interference, construction loading, vibration and access constraints, all of which are inherent risks in a development of the scale and nature of the Project.	The Applicant refers to its response to WR-NGT-007.
WR-NGT-009	Protective Provisions	5.3 Notwithstanding the merits of the NGT Protective Provisions, it is important when operating a large network that the legal framework within which operatives must work is largely the same. It is impossible to operate a large network with the efficiency that bill-payers are entitled to expect if operatives are required to check the exact terms of any relationship with third parties each time they carry out an activity. Therefore, an efficient operator should seek to keep the terms of such relationships the same. It is for this reason that NGT seeks to achieve (1) consistency	The Applicant refers to its responses to NGT-001 and NGT-003 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 notes NGT's preference for protective provisions for NGT's benefit to be the same in every DCO. However, it is also important to ensure that the protective provisions are relevant and appropriate for the Scheme and its potential impacts on NGT's apparatus.

ID	Theme	Comments/Issues Raised	Applicant's Response
		of terms; and (2) consistency of process through the NGT Protective Provisions. 5.4 NGT also seeks to keep the Protective Provisions for all Development Consent Orders broadly the same as the provisions which govern the legal relationship between NGT and landowners, and developers generally.	
WR-NGT-010	Protective Provisions	6.1 NGT considers that the Protective Provisions that have been included within the Draft Order are deficient in a number of respects, with the key areas of disagreement being as set out below: 6.2 The definitions of "acceptable insurance" and "acceptable security" in the Draft Order include the words "or such lower amount as approved by National Gas" in connection with the fixed minimum levels of insurance and security cover (being £50,000,000), with the intention that a lower level of acceptable insurance and/or acceptable security can be agreed between the Applicant and NGT in connection with the Project at a later date.	The Applicant continues to discuss this particular point with NGT in respect of the Lime Down PPs.
WR-NGT-011	Protective Provisions	6.3 NGT's position is that the stated £50 million represents the minimum appropriate level of insurance and security cover required in connection with	The Applicant continues to discuss this particular point with NGT in respect of the Lime Down PPs.

ID	Theme	Comments/Issues Raised	Applicant's Response
		development in close proximity to its assets, having due regard to the criticality of its assets and the risks identified in connection with solar developments (such as the Project) (as set out at Appendix 3). It is therefore not appropriate to include a mechanism in the Protective Provisions for agreeing a reduced amount of insurance or security within the PPs (noting that the function of acceptable security is to address any uninsured or uninsurable gaps in the insurance cover and to ensure that NGT is protected in the event of insurer insolvency, as such a reduction in either the insurance or the security is accordingly not acceptable).	
WR-NGT-012	Protective Provisions	6.4 Additionally, the definition of 'acceptable insurance' needs to be updated to specify that the same is required to be in place in connection with the decommissioning of the Project, as the risks arising during decommissioning of the Project will be similar in nature to those that will be inherent in construction of the Project (and are if anything greater, as demolition is generally undertaken with less precision, care and control than construction).	The Applicant continues to discuss this particular point with NGT in respect of the Lime Down PPs.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NGT-013	Protective Provisions	6.5 Where NGT agrees that the Project may conflict with, breach, or otherwise interfere with any of NGT's existing easements or interests in respect of apparatus laid or erected in land belonging to or secured by the Applicant (noting that there is an absolute prohibition on such interference in the absence of express agreement by NGT), the NGT Protective Provisions require the Applicant to (i) enter into deeds of consent replacing or varying those rights on terms no less favourable to NGT overall, and (ii) procure any necessary third-party consents or participation to give effect to those arrangements. The Applicant has proposed that limb (ii) of this obligation is subject to a "reasonable endeavours" caveat. 6.6 NGT's position is that the function of this wording is to clarify that the responsibility for securing any such third party consents sits squarely with the Applicant, and as such this qualification is not acceptable, for the following reasons: (a) if the Applicant cannot secure the necessary third-party consents despite reasonable endeavours, NGT could be left with less	The Applicant continues to discuss this particular point with NGT in respect of the Lime Down PPs.

ID	Theme	Comments/Issues Raised	Applicant's Response
		favourable arrangements and no fallback mechanism. There is a resulting risk that NGT could be impaired in its ability to retain, access and maintain the NGT Assets, and consequently its ability to manage and operate its statutory undertaking in a safe and efficient manner. That is not a position that NGT can accept; and (b) in practice, the Applicant would need to identify which (if any) third-party consents are needed to secure appropriate alternative arrangements for NGT, and to secure the same (potentially on a conditional basis) before NGT would agree to any extinguishment or interference, rather than leaving this to a reasonable endeavours effort after the event.	
WR-NGT-014	Protective Provisions	6.7 The Applicant has sought a fixed 42 day period within which NGT must respond to requests for approval of plans, sections, and descriptions of works under the NGT Protective Provisions. 6.8 NGT can agree a period of 56 days for approval of plans, which is consistent with the minimum timeframe within which the	The Applicant continues to discuss this particular point with NGT in respect of the Lime Down PPs.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Applicant must submit plans for approval, with this timeframe being subject to the works plans in question being accompanied by a sufficiently detailed method statement to allow NGT to properly assess the application, and also subject to an appropriate extension of time in the case of an anticipated delay to plan approval by reason of an emergency. The NGT Protective Provisions contain drafting to reflect this.	
WR-NGT-015	Protective Provisions	6.9 The Protective Provisions included in the Draft Order also contain a number of 'clarificatory' amendments and drafting amendments that deviate from the wording of the NGT's Protective Provisions and would, in some instances, dilute the protection afforded to NGT under the Protective Provisions. NGT's position is that these changes introduce unnecessary deviation from NGT's standard form Protective Provisions and would interfere with NGT's need (detailed at paragraphs 5.3 and 5.4 above) to retain consistency regarding the Protective Provisions that it agrees across all of the DCO projects that it is impacted by, and thus increases the likelihood of disputes arising across its national network.	The Applicant notes this point and refers to its response to WR-NGT-009.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Therefore, amendments of this nature are not acceptable.	
WR-NGT-016	Status of negotiations	7.1 As discussed above, NGT has not received any substantive engagement from the Applicant on the Protective Provisions, despite NGT's attempts to enter into negotiations on this matter. 7.2 Until satisfactory Protective Provisions are included on the face of the Order, NGT must continue to object to the application for the Order and reserves its right to make further submissions to the ExA at a later date, including appearance at and participation in Compulsory Acquisition and/or Issue Specific Hearings to address the required format of the Protective Provisions and any necessary amendment to the Order. NGT also reserves the right to provide further written information in support of any detailed issues remaining in dispute between the parties at that stage.	The Applicant has repeatedly made it clear to NGT's solicitors that until negotiations have concluded in respect of the Lime Down PPs there was little merit in having the same discussion in respect of the Scheme.

2.4 National Grid Electricity Transmission plc

Table 2.4 Applicant's Response to National Grid Electricity Transmission Plc [REP1-269]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NGET-001	General Remarks	Application by East Pye Solar Ltd for an order granting development consent for the East Pye Solar project (EN0110014) Notice of Intention of National Grid Electricity Transmission Plc not to attend Issue Specific Hearing 1 This letter sets out National Grid Electricity Transmission Plc's ("National Grid") response to the Examining Authority's Agenda for Issue Specific Hearing 1 (ISH1) on the scope of the proposed development, site selection and the draft Development Consent Order published on 8 September 2026 (the "Agenda").	The Applicant notes this comment.
WR-NGET-002	General Remarks	In the Agenda, the Examining Authority states that it would be assisted by attendance of representatives of National Grid alongside eight other parties. Whilst National Grid appreciates this invitation to attend ISH1, we do not consider that it is necessary to do so.	The Applicant notes this comment.
WR-NGET-003	General Remarks	National Grid's position on the DCO application is set out in its relevant representation (RR-1407). We consider this adequately addresses our client's	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		position on the DCO application at this stage of the examination. We do not consider that attendance at ISH1 would add substantively to the points already made in writing. The Applicant is in a better position to respond to the matters raised in the Agenda at this stage of the examination.	
WR-NGET-004	General Remarks	We confirm that National Grid intends to remain engaged in the examination as an interested party. National Grid reserves its position to attend future hearings, including further issue specific hearings, should matters arise that we consider require oral representation. National Grid will respond to any written questions at the appropriate stage of the examination.	Engagement with National Grid and the position of both parties is set out within **Statement of Common Ground with National Grid Electricity Transmission [REP1-090]** submitted at Deadline 1 and records the discussed to date and areas of ongoing engagement. Further engagement and areas of agreement will be outlined in the SoCG at Deadline 3.
WR -NGET-005	General Remarks	1 INTRODUCTION 1.1 National Grid Electricity Transmission Plc ("NGET") made a Relevant Representation in this matter on 10 June 2026 [RR-1408] in order to protect both apparatus and operational land owned by NGET. 1.2 NGET owns and operates the electricity transmission network in England and Wales. NGET operates but does not own the Scottish networks.	The Applicant notes this comment. The Applicant has provided a response to NGET's Relevant Representation within **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
		NGET is required to comply with the terms of its Electricity Transmission Licence in the delivery of its statutory responsibility. Under Section 9 of the Electricity Act 1989, NGET has a statutory duty to maintain 'an efficient, co-ordinated and economical' system of electricity transmission.	
WR -NGET-006	General Remarks	1.3 As set out in its Relevant Representation, NGET requires protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. Without inclusion of protective provisions in a form agreed by NGET, serious detriment would be caused to NGET's undertaking as well as to other third-party projects which are reliant on NGET's existing and future transmission infrastructure, including the East Pye Solar Project (the "Project") itself.	The Applicant refers to its responses NGET-001, NGET-002 and NGET-003 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 -NGET-007	General Remarks	2 ENABLING NET ZERO 2.1 Demand for electricity in the United Kingdom is expected to rise as the way in which power for the country's homes, businesses and transport changes. As the nation moves towards net zero, the fossil	The Applicant notes and agrees with these remarks. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms. 2.2 The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim. 2.3 NGET's ongoing infrastructure projects in England and Wales will support the country's energy transition and make sure that the electricity transmission network is ready to connect to more and more sources of low carbon electricity generated in Britain. 2.4 The way in which electricity is generated in the United Kingdom is also changing rapidly. This means that NGET needs to move swiftly to build new infrastructure and to make upgrades to the electricity transmission network in order to bring this clean, green energy from where it is generated to where it is needed by homes and businesses.	solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. Further, Section 4.3 of the Statement of Need explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify non-traditional demand sectors, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward to meet current and future electricity demand. The Applicant is bringing forward the Scheme to support the government's aim to achieve and sustain a clean power system on the way to achieving national net zero by 2050. Using the available and currently underutilised transmission line to connect the Scheme to the national electricity transmission system is critical to support the urgent deployment of low carbon generation assets required to decarbonise the UK's electricity system.
WR -NGET-008	NGET Apparatus	3 NGET APPARATUS	The Applicant refers to its responses NGET-001, NGET-002 and NGET-003 in **The Applicant's**

ID	Theme	Comments/Issues Raised	Applicant's Response
		3.1 NGET's Relevant Representation [RR-1408] specifies the extent of NGET's existing and planned future transmission apparatus situated within or in close proximity to the proposed Order Limits for the Project. This apparatus forms (or, indeed, will form) an essential part of the electricity transmission network in England and Wales. 3.2 As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to its transmission apparatus, and any other infrastructure and land which is within or in close proximity to the draft Order Limits.	**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 -NGET-009	NGET Apparatus	3.3 Taking account of NGET's obligations under section 9(2) of the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission NGET must, therefore, have regard to the need in the area as dictated by the status of the offers from NESO and offer an economic and efficient solution for all customers.	The Applicant refers to its responses NGET-006, NGET-007 and NGET-008 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]** and BEPS-PDA-042 in **The Applicant's Responses to Procedural Deadline A and Additional Submissions [REP1-103].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		3.4 In order to align with this obligation, it is expected that the point of connection for the Project will also facilitate the connection of a number of other customers. There is, therefore, the potential that significant infrastructure will be delivered within the same area and within similar timescales, albeit not necessarily to the same location, size or specification proposed in the Applicant's DCO application. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Applicant to ensure that as connection offers are formalised and the scope of infrastructure to be delivered becomes clear, each connectee project (including the Project) can be delivered without unduly interfering with other connectee projects.	
WR -NGET-010	NGET Apparatus	3.5 This is a matter which NGET expects the Applicant will be particularly familiar with (the same issue having arisen, most recently, in the context of the Examination of the Droves Solar Farm). Unsurprisingly, it represents a critical aspect of the protective provisions which NGET is seeking to include in the draft Order.	The Applicant refers to its responses NGET-003, NGET-007 and NGET-008 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]** and Agenda Item 5 page 38 in **Written Summary of the Applicant's Oral Submission and Responses at**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Issue Specific Hearing 1 and Response to Action Points [REP1-098].
WR -NGET-011	NGET Apparatus	3.6 Therefore, and in respect of the transmission apparatus, NGET will require protective provisions to be put in place to ensure that: (a) all NGET interests and rights, including rights of access, are unaffected by the power of compulsory acquisition, temporary possession, and the grant and/or extinguishment of rights as set out in the draft Order;	The Applicant refers to its responses NGET-001, NGET-002, NGET-003, NGET-010, and NGET-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].**
WR -NGET-012	NGET Apparatus	(b) appropriate protection for all transmission apparatus is maintained during and after construction of the Authorised Development. (This includes compliance with all relevant safety standards as further described below); and	The Applicant refers to its responses NGET-001, NGET-002, NGET-003, and NGET-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].**
WR -NGET-013	NGET Apparatus	(c) there is an appropriate (and precedented) safeguarding mechanism which will ensure that the protective provisions apply to third party land which will be required for future point of connection works, notwithstanding the fact that specific details regarding that point of connection are unknown.	The Applicant refers to its responses NGET-001 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 -NGET2-014	NGET Apparatus	3.7 NGET considers that it is reasonable, necessary and appropriate for these precedented safeguards and protections to be included in the draft Order for this Project.	The Applicant refers to its response NGET-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].**
WR -NGET-015	Regulatory Protection Framework	4 REGULATORY PROTECTION FRAMEWORK 4.1 NGET has issued guidance in respect of standards and protocols for working near to electricity transmission equipment in the form of: (a) Third Party Working near National Grid Electricity Transmission equipment - Technical Guidance Note 287. This cross-refers to statutory electrical safety clearances which are used as the basis for ENA (TA) 43-8, which must be observed to ensure safe distance is kept between exposed conductors and those working in the vicinity of electrical assets; and (b) Energy Network Associations Development near Overhead Lines ENA (TS) 43-8, which sets out the derivation and applicability of safe clearance distances in various circumstances	The Applicant notes NGET's reference to Technical Guidance Note 287 and ENA (TS) 43-8. The Applicant refers to its previous response NGET-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]**, which confirms that protective provisions for the benefit of NGET have been included within Part 4 of Schedule 14 to the **Draft DCO [REP1-014]**. The Applicant acknowledges the importance of maintaining appropriate safety clearances and protecting existing transmission apparatus. The Applicant will continue to engage with NGET regarding the protective provisions and the application of relevant safety standards to works undertaken in proximity to NGET's infrastructure.

ID	Theme	Comments/Issues Raised	Applicant's Response
		including crossings of overhead lines and working in close proximity.	
WR -NGET-016	Regulatory Protection Framework	4.2 Additionally, HSE's guidance note 6 "Avoiding Danger from Overhead Power Lines" summarises advice to minimise risk to life/personal injury and provides guidance to those planning and engaging in construction activity in close proximity to overhead lines.	The Protective Provisions as drafted in Part 4 of Schedule 14 to the **Draft DCO [REP1-014]** include reference to this guidance in the definition of "specified works" in paragraph 31. The Applicant will continue to engage with NGET regarding the Protective Provisions.
WR -NGET-017	Regulatory Protection Framework	4.3 NGET requires the protective provisions included in the draft Order to provide for an appropriate level of control and assurance that industry standards will be complied with in connection with works to and in the vicinity of its electricity assets (including overhead line).	The Applicant refers to its responses NGET-001 and NGET-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].**
WR -NGET-018	Regulatory Protection Framework	4.4 NGET seeks to protect its statutory undertaking, and insists that in respect of connections and work in close proximity to its apparatus the following procedures are complied with by the Applicant: (a) NGET is in control of the plans, methodology and specification for works within 15 metres of any retained apparatus; and	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR -NGET-019	Regulatory Protection Framework	(b) appropriate surety and insurance provisions are in place to back up an uncapped indemnity to protect NGET from any damage, losses or claims arising from development associated with the proposed Project.	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.
WR -NGET-020	Property Issues	5 PROPERTY ISSUES 5.1 Maintaining appropriate property rights to support and protect NGET's transmission apparatus from compulsory acquisition and related powers in the draft Order is a fundamental safety issue.	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.
WR -NGET-021	Property Issues	5.2 Insufficient property rights would have the following safety implications in relation to that apparatus: (a) an inability for qualified personnel to access apparatus for its maintenance, repair and inspection; (b) a risk of strike to buried assets if the Authorised Development occurs within the easement zone which seeks to protect such assets; and (c) a risk of inappropriate development within the vicinity of NGET's apparatus, thereby increasing the risk of damage to those assets and to the integrity of the electricity transmission network.	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.

ID	Theme	Comments/Issues Raised	Applicant's Response
WE -NGET-022	Property Issues	5.3 NGET therefore maintains its position that without an agreement or qualification on the exercise of unfettered compulsory powers or connection to its apparatus the following consequences will arise: (a) failure to comply with industry safety standards, legal requirements and Health and Safety Executive standards create a health and safety risk; (b) any damage to apparatus has potentially serious hazardous consequences for individuals located in the vicinity of the apparatus if it were to fail; and (c) prevention of NGET's ability to access its land or exercise its rights over land caused by the Project could inhibit NGET's ability to comply with its duties as statutory undertaker to provide electricity transmission.	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.
WR -NGET-023	Protective Provisions	Current Status 5.4 NGET is aware that a form of protective provisions for the benefit of NGET (the "Protective Provisions") have been included by the Applicant in Part 4 of Schedule 4 to the draft DCO [AS-032].	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.

ID	Theme	Comments/Issues Raised	Applicant's Response
		5.5 However, the Protective Provisions are not yet in a form satisfactory to NGET.	
WR -NGET-024	Protective Provisions	5.6 For the reasons given in both this Written Representation and in NGET's earlier Relevant Representation, NGET contends that it is essential that the current deficiencies in the Protective Provisions are addressed to its satisfaction in order to ensure adequate protection for its existing and intended future apparatus.	The Applicant notes this comment and will continue to engage with NGET regarding the protective provisions.
WR -NGET-025	Protective Provisions	5.7 Should it not be possible to reach agreement with the Applicant, NGET reserves its right to attend a future Compulsory Acquisition Hearing to address the required format of the Protective Provisions and any necessary amendment to the draft Order.	The Applicant anticipates reaching agreement with NGET on the Protective Provisions prior to the end of Examination.
WR -NGET-026	Protective Provisions	5.8 If this is necessary NGET also reserve the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage.	The Applicant notes this comment.

2.5 Environment Agency

Table 2.5 Applicant's Response to Environment Agency [REP1-191]

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
WR-EA-001	Outline Construction Environmental Management Plan	Issue:	The definition of the words "commence" and "permitted preliminary works" means that certain activities that may cause environmental harm – (specifically (d) remedial work in respect of any contamination or other adverse ground conditions.) are not covered by the outline Construction Environmental Management Plan.	On-going. While we do not have any objection to the adoption of this approach in principle, an outline Preliminary Works Environmental Management Plan should be prepared and submitted for review during the Examination process. There is currently insufficient detail available about the proposed content of the Preliminary Works Environmental Management Plan for us to be confident that this will provide suitable environmental monitoring and mitigation for the	The Applicant has prepared a Permitted **Preliminary Works Environmental Management Plan [EXAM/9.32]** that has been submitted at Deadline 2.
		Impact:	The mitigation commitments secured via the oCEMP will not be applied to this activity, creating a risk		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			of pollution to the water environment.	Permitted Preliminary Works, consistent with the approach taken in the CEMP. The Local Authority should be named as approver of the Preliminary Works Environmental Management Plan, with the EA as a named consultee.	
		Solution	Amend DCO wording to ensure that remediation of contamination or other adverse ground conditions would be required to be in accordance with the approved detailed CEMP, or else subject to equivalent environmental mitigation.		
WR-EA-002	Water Environment	Issue:	The applicant wishes to disapply Flood Risk Activity Permits however no request has been made to the EA to do so.	On-going. We have received further information from the Applicant regarding the activities for which disapplication is sought. We are currently reviewing our position, and will respond for Deadline 2.	The Applicant notes this comment.
		Impact:	Risks to the water environment may not be adequately managed.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		Solution:	Provide details to include the nature, location and the associated environmental risks of the activities for which disapplication is sought. We will then be able to advise the planning inspectorate if it is appropriate to disapply.		
WR-EA-003	Draft DCO	Issue:	The Environment Agency is currently not included as a named consultee in Schedule 2 for: Requirement 6 – Battery Safety management plan Requirement 13 - Construction environmental management plan; Requirement 14 - Operation	On-going. We are satisfied that the EA has been included as a named consultee for Requirement 6, 13 and 14. Within Requirement 13, there is currently no mechanism to secure the approval of the permitted preliminary works environmental management plan. The Local Authority should be named as approver of the Preliminary	The Applicant notes that the EA is satisfied that it has been included as a named consultee for Requirement 6, 13 and 14. The Permitted Preliminary Environmental Management Plan is a final (not outline) document and is not therefore subject to further approval. The Applicant intends to update the **Draft DCO [REP1-014]** at a future deadline to correct the typographical error in Requirement 14(1) so that it

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			environmental management plan.	Works Environmental Management Plan, with the EA as a named consultee. Requirement 14 (1) – An error refers to construction management plan, but should instead read operational management plan.	refers to the operational environmental management plan.
		Impact:	If the Environment Agency is not named on the relevant requirements, then we may not be able to secure the required details post-consent.		
		Solution:	We request to be named as consultee for Requirements 6, 13 and 14.		
WR-EA-004	Draft DCO	Issue:	The use of the phrase 'Substantially in accordance with' in requirements undermines enforceability and creates unnecessary uncertainty.	On-going. We maintain our position.	The Applicant refers to its response EA-004 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 notes that the Secretary of State has considered the use of "substantially in
		Impact:	Requirements cannot be enforced appropriately and topic details which have previously been		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			agreed and information that the EA has based its position on can be undermined.		accordance" to be appropriate in the recent decision to grant the Green Hill Solar Farm Order 2026.
		Solution:	Remove the word substantially from all requirements.		
WR-EA-005	Protective Provisions	Issue:	The EA Protective Provisions which have been included in the DCO are not standard and for a FRAP which we haven't agreed to disapply.	On-going. We note this and will continue to engage with the Applicant to secure EA standard protective provisions, if required should the disapplication of FRAPs be agreed.	The Applicant notes this comment and will engage with the EA further on the disapplication of FRAPs and on Protective Provisions.
		Impact:	Non standard wording of protective provisions creates legal uncertainty and risk to enforcement, with the potential for risk to the Environment.		
		Solution:	If disapplication is approved replace protective provision		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			with EA standard approved protective provisions.		
WR-EA-006	Draft DCO	Issue:	LPA must notify the undertaker within 15 working days of receipt of consultation, if further information is requested by a named consultee. Therefore, the named consultee has 10 working days to review the consultation & determine if sufficient information has been provided. The Environment Agency has been given insufficient time to review and respond to the discharge of requirements.	On-going. We are satisfied with this amendment. We await review of the revised Draft DCO to resolve this issue.	The Applicant notes that the EA are satisfied with this amendment and that this amendment was made to the **Draft DCO [REP1-014]** submitted at Deadline 1.
		Impact:	Not having sufficient time will undermine the consultation process and the		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			protection of the environment		
		Solution:	Amend to 15 working days to review the consultation & determine if sufficient information has been provided.		
WR-EA-007	Water Environment	Issue:	Figure 5.4 suggests all solar panel development will be located outside of flood zones 2 and 3. However, paragraph 8.1.4 indicates panels may be affected by the design flood extent (i.e when an allowance for climate change is included).	On-going. The applicant's response does not clarify the risk or address the potential impacts on floodplain storage at this area of the site. EA 007 relates to paragraph 8.1.4 of the FRA where it is stated 'The maximum modelled 1 in 100 AEP +35% allowance for climate change flood level is 29.33m AOD. The Solar PV Arrays within Sub-Site 8A are set at a minimum ground level of 29.00-29.40m AOD.' This	The Applicant notes that this is a misunderstanding of the local floodplain impacts due to the selective quoting of the maximum flood level only, which falsely implies some shallow flooding when directly comparing to the lower referenced ground level of 29.00m AOD. In reality, the flood level at this location is lower than the maximum quoted. Location of solar panels outside of the modelled floodplain is shown in Figure 5.4 of **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage**
		Impact:	Potential loss of floodplain storage caused by solar panels located within the design flood extent.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		Solution:	The FRA should confirm where, and to what extent, panels are proposed within the 1 in 100 yr plus climate change design flood extent. A volumetric assessment of panel supports within the flood extent should then be provided to assess the potential impact on floodplain storage.	describes a potential flood depth of 0.33m at solar array areas.	**Strategy [REP1-052]**, but further detail of the ground levels and flood levels across this area can be provided if required to address this outstanding point.
WR-EA-008	Water Environment	Issue:	Avoidance Areas are proposed at proposed watercourse crossings. However further detail is required on the location and design of works crossing Main River watercourses.	Resolved. Principles relating to Avoidance Areas are noted.	The Applicant is pleased to see that this matter has now been resolved and refers to the **Statement of Common Ground with Environment Agency [REP1-087]** submitted at Deadline 1 which reflects the current position on this matter.
		Impact:	There is potential for temporary works to increase flood risk where works are		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			located within the floodplain and / or affect the Main River channel, bed, or banks.		
		Solution:	The extent of Avoidance Areas should be confirmed in terms of meters set back from watercourses. Confirmation should be also provided that Main River watercourse crossings will be undertaken by trenchless techniques i.e. HDD, and that locations of launch and reception pit are set back in accordance with guidance set out within The Environmental Permitting (England and Wales) Regulations 2016.		

ID	Theme	EA's Relevant Representations Comment	EA Comment for Deadline 1	Applicant's Response
		The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • On or within 8 metres of a main river (16 metres if tidal) • On or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • On or within 16 metres of a sea defence • Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits			
WR-EA-009	Water Environment	Issue:	The FRA notes the potential use of culverts at watercourse crossings.	Resolved. Hierarchy for the nature of watercourse crossings is noted.	The Applicant is pleased to see that this matter has now been resolved and refers to the **Statement of Common Ground with Environment Agency [REP1-087]** submitted at Deadline 1 which reflects the current position on this matter.
		Impact:	Installation of new culverts has the potential to increase flood risk to both the development and offsite receptors.		
		Solution:	We would encourage the use of a clear-span bridges in preference to new culverts. This is in line with the Environment Agency's anticulverting policy.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period [paragraph 3.10.78 and 3.10.79 of NPS EN3].			
WR-EA-010	Water Environment	Issue:	Chapter 9 is missing relevant guidance.	On-going. We acknowledge that Volume 1 Chapter 9 is not intended to provide an exhaustive list of relevant guidance. The outline CEMP and	The **Outline CEMP [REP1-058]** has been updated at Deadline 2 to include reference to Oil storage regulations for businesses - GOV.UK, Pollution prevention for businesses - GOV.UK, and CIRIA C736, titled "Containment
		Impact:	Risk that best practice may not be followed resulting in avoidable environmental harm.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		Solution:	Guidance in relation to water environment and mitigation measures that could be included is: • Oil storage regulations for businesses - GOV.UK • Pollution prevention for businesses - GOV.UK • CIRIA C736, titled "Containment Systems for the Prevention of Pollution" • Nationally Significant Infrastructure Projects: Advice on the Water Framework	Water Framework Directive (WFD) Assessment submissions include reference to some of the additional requested guidance documents but not all. The oCEMP (Revision 1, March 2026) includes reference to the Control of Substances Hazardous to Health Regulations 2002 and the Control of Pollution (Oil Storage) (England) Regulations 2001 but does not refer to the Oil Storage Regulations for Businesses guidance, Pollution Prevention for Businesses guidance, or CIRIA C736 'Containment Systems for the Prevention of Pollution'. Impact Risk that best practice may not be followed resulting in avoidable	Systems for the Prevention of Pollution".

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			Directive - GOV.UK	environmental harm. Solution Guidance in relation to water environment and mitigation measures that could be included is: • Oil storage regulations for businesses - GOV.UK • Pollution prevention for businesses - GOV.UK • CIRIA C736, titled "Containment Systems for the Prevention of Pollution" • Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK Volume 3 Appendix 9.2 Water Framework Directive Assessment does not reference any of the documents listed in our Relevant Representation other than Nationally Significant Infrastructure	

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
				Projects: Advice on the Water Framework Directive.	
WR-EA-011	Water Environment	Issue:	Section 9.5.2 of Chapter 9 and 3.1.2 of WFD Assessment, which explains sources of data collection, does not include the Water Quality Explorer.	On-going. We acknowledge that data from the Water Quality Explorer will be reviewed and the WFD Assessment will be reviewed at a future deadline. We await review of the revised document to resolve this issue.	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Water Framework Directive Assessment [REP1-056]** submitted at Deadline 1.
		Impact:	If all available data isn't used, then valuable data may be missing from the baseline assessment.		
		Solution:	The Applicant should use Map Explorer | Water Quality Explore		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			for water quality measurements taken in the vicinity to use for baseline data.		
WR-EA-012	Water Environment	Issue:	Section 9.7.3 says storage "away from main rivers and watercourses" but a specific distance is not provided.	On-going. We await review of updated documents to clarify this issue. The commitment CWE38 in the Commitments Register [AS 038/AS-039] needs to be updated to reflect that the 10m watercourse buffers is relevant for all phases, not just operation.	The Applicant notes this comment and confirms that the **Design Principles, Parameters and Commitments [REP1-078]** has been updated at Deadline 1 to include reference to a minimum of 10m from top of bank of watercourses. Commitment CWE38 in the **Commitments Register [EXAM/7.26]** has been updated at Deadline 2 to reflect that the 10m buffer commitment is applicable across all phases.
		Impact:	Inadequate buffers alongside watercourses increases the risk of activities on site having an impact on water quality		
		Solution:	Documents should consistently specify that storage of materials and temporary construction compounds/laydown areas should be at least 10m away from top of bank of		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			watercourses, and, where practicable, away from areas of high groundwater vulnerability.		
		We do note that 9.7.8 of Chapter 9; Outline Surface Water Drainage Strategy, Tables 3.4 and 4.4 of OCEMP, and Tables 3.4 and 4.4 of ODEMP states 10m, however it should be clear that this is measured from top of bank.			
WR-EA-013	Water Environment	Issue:	During construction and operation phases self-contained portable welfare units will be used to store foul/wastewater for collection/emptying by specialist licenced contractors. However, it is unclear what is proposed for decommissioning. The units are described as 'self-contained' but it is unclear if this means they are fully	Resolved. Statements within the outline OEMP and Decommissioning Environmental Management Plan (DEMP) confirm that foul water is to be contained in sealed systems and removed via tanker for offsite treatment or disposal	The Applicant is pleased to see that this matter has now been resolved and refers to the **Statement of Common Ground with Environment Agency [REP1-087]** submitted at Deadline 1 which reflects the current position on this matter.

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			sealed with no potential for discharge to the environment.		
		Impact:	Inadequate foul water treatment and disposal creates a risk to the water environment and deteriorating water quality.		
		Solution:	Provide clarity that the portable units are sealed and will have no discharge to surface water or groundwater. Provide clarity regarding foul water disposal strategy during decommissioning.		
		We note that section 9.7.9 of Chapter 9 and 9.12.4 from Drainage Strategy says "Foul water from welfare facilities during the construction and decommissioning phases will be contained within sealed systems			

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		and tankered from the Order Limits", but this should be consistent across documents. Information on septic tank permits can be found at: Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK If road transport to an offsite disposal facility is required to remove foul water from the forementioned "self-contained" units, then there should be regard for this within the waste management procedures.			
WR-EA-014	Water Environment	Issue:	We are not satisfied that the Water Management Plan will be based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network. Table 3.4 of oOEMP doesn't include reference to	On-going. We understand that the outline CEMP will be updated at Deadline 1 (DL1) to include further details of proposed ground investigation and water quality monitoring requirements. The oOEMP [APP-197] doesn't include	The **Outline CEMP [REP1-058]** has been updated at Deadline 1 to include reference to the post-consent ground investigation and the groundwater and surface water quality monitoring that will be undertaken. It is proposed to undertake monitoring of surface water quality prior to, during, and

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			the WMP despite the intended post-construction water quality monitoring.	reference to the WMP despite the intended post construction water quality monitoring. This should be updated and submitted at a subsequent deadline. We await review of the revised documents to resolve this issue.	immediately after construction to provide data to evidence that the construction phase has not had an adverse impact on surface water quality. The WMP is therefore suitably secured through the **Outline CEMP [REP1-058]** and Requirement 13 in Schedule 2 to the **Draft DCO [REP1-014].** The Applicant will await further response from the Environment Agency following their review of the updated document.
		Impact:	An inadequate monitoring plan may not detect any relevant trends on water quality during the construction and operation phases.		
		Solution:	Ensure the oCEMP and oOEMP provide adequate details regarding water quality monitoring to include frequency and duration. Applicant should confirm there will be in-situ measurements using MCERTS approved methods and water samples to be sent to a UKAS accredited laboratory.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		We note that a Water Management Plan will include details of pre-construction, construction, and post-construction water quality monitoring. Locations and specific parameters/methods can be agreed with the EA at detailed design. These locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings.			
WR-EA-015	Water Environment	Issue:	Concrete mitigation measures have not been detailed. Construction of concrete can be a risk to water quality as it is a known source of hazardous substances, particularly during the curing phase	On-going. We note that the detailed CEMP will provide greater detail regarding concrete mitigation. However, Table 3.4 in the oCEMP should include an outline of the intended approach to controlling the risks from concrete, to be expanded upon in the detailed plan(s). We await review of the revised document to resolve this issue.	The Applicant acknowledges that more details will be required regarding the use of concrete. However, such detail is not available at this stage of the process given the design flexibility requires at consenting stage. The detailed CEMP will provide greater detail regarding concrete mitigation including: • the location concrete works are proposed,
		Impact:	Risk of pollution to surface waters		
		Solution:	Provide further details on the use of concrete		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			and how it will be managed.		• the nature of the concrete works taking place, • the methodology and mitigation proposed for in-situ concrete pours; and • Containment measures for concrete washout areas. This is secured through Requirement 13 (Construction environmental management plan) of the **Draft DCO [REP1-014]** which requires the detailed CEMP to be submitted for the approval of the relevant planning authority, in consultation with the EA. This ensures that the final details will be suitably controlled.
		Further details should include: • Identify all areas where concrete works are proposed • Specify whether these will be cast in situ or precast and delivered. (We acknowledge that Table 3.4 CEMP says that concrete feet may be pre cast concrete.) • For in situ concrete pours, Applicant should suggest timing, weather conditions, and runoff control. Construction works should be minimised during heavy precipitation events and carried out during dry months where practicable. • Describe containment measures for concrete washout (e.g. lined washout pits, bunded areas)			

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
WR-EA-016	Water Environment	Issue:	Inadequate detail provided regarding the storage and management of fuel, chemicals and oils storage.	On-going. We note that Section 3 of the outline OEMP will be updated to confirm bunding and impermeable drainage infrastructure will be in place to manage fuel and other potentially polluting chemicals, and that the use of 10m watercourse buffers will be confirmed in the oDEMP and oOEMP, at DL1. We await review of the revised document to resolve this issue.	The Applicant will await further response from the Environment Agency following their review of the updated document.
		Impact:	Increased risk of fuel, chemicals and oils entering the water environment and impacting on water quality.		
		Solution:	Fuel, chemical and oil storage must be on impermeable surface, bunded and covered to prevent rainfall accumulation. If necessary, a method to remove accumulated rainwater should be provided. Hazardous materials should be stored at least 10m from watercourses. Oil separators could also be used in drainage		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			systems. Substation drainage systems should be impermeably lined. Ensure mitigation measures used in construction phase are consistent with the decommissioning phase.		
		Fuel storage should comply with this guidance: Oil storage regulations for businesses - GOV.UK and Pollution prevention for businesses - GOV.UK We acknowledge that it says, "storage tanks would be sheltered", but this may not be enough to prevent rainfall accumulation.			
WR-EA-017	Water Environment	Issue:	Lack of clarity regarding the management, containment and disposal of wheel wash water.	On-going. We acknowledge that the Applicant will update the oCEMP and oDEMP at DL1 (DL1) to provide further details of wheel wash mitigations. We await review of the	The Applicant will await further response from the Environment Agency following their review of the updated document.
		Impact:	If contaminated wash water is not managed		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			correctly, it can enter watercourses and impact on water quality.	revised document to resolve this issue.	
		Solution:	Provide clarity that wheel washing activities will be undertaken within a designated impermeable or lined area. Wash water should be contained to prevent contaminated water entering waterbodies or groundwater. The frequency of maintenance of the wheel washing system should be specified. Provide clarity that, if discharge on-site is required, a water discharge activity permit will be sought from the Environment Agency. Rumble strips and dry brushing		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			could be used to remove mud from wheels to help minimise risk to water quality.		
		We note that Table 3.4 of the ODEMP says "Equipment and plant to be washed and cleaned in temporary compounds, where runoff can be isolated for treatment before disposal", but further information is needed.			
WR-EA-018	Ground Conditions	Issue:	Further detail is required in Table 3.4 regarding the proposed content of the drilling fluid breakout contingency procedure.	On-going. The proposals for management of surface seepage and surplus drilling fluids are acceptable. We acknowledge that the oCEMP will be updated at DL1 to confirm that the drilling fluid breakout contingency procedure will include monitoring for loss of drilling fluids to ensure rapid identification of break-out, and that an	The **Outline CEMP [REP1-058]** has been updated at Deadline 2 to include the requested text: "*Any pollution incident involving break out of drilling fluid into a watercourse must be immediately reported to the Environment Agency Incident line 0800 80 70 60 to enable the situation to be assessed as soon as possible*". The Applicant will await further response from the Environment
		Impact:	Risk of pollution to watercourses if drilling fluid break-outs are not managed correctly.		
		Solution:	The oCEMP should include monitoring for		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			loss of drilling fluid during works to ensure any break-out is rapidly identified	Emergency Response Plan will accompany the detailed CEMP. The oCEMP should be updated to include text that states: 'Any pollution incident involving break out of drilling fluid into a watercourse must be immediately reported to the Environment Agency Incident line 0800 80 70 60 to enable the situation to be assessed as soon as possible' The EA has experience of previous instances where unacceptable delays in incident reporting have resulted in significant damage to chalk stream habitat. We await review of the revised document to resolve this issue.	Agency following their review of the updated document.

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
WR-EA-019	Decommissioning	Issue:	Inadequate detail in the oDEMP regarding mitigation measures for the water environment. Measures are indicated to be similar to those established in the oCEMP but some relevant measures identified in the oCEMP are not included.	On-going. We acknowledge that the detailed DEMP will provide details of mitigation for potential environmental effects on the water environment, and that the EA is a named consultee under Requirement 21 of the Draft DCO. Even so, we consider that the oDEMP should provide greater detail of the proposed mitigation measures to be employed to protect the water environment during decommissioning.	The Applicant notes this comment and has updated the **Outline DEMP [REP1-062]** with the relevant measures at Deadline 2.
		Impact:	Risk that unmitigated decommissioning activities may result in environmental harm.		
		Solution:	The Applicant should provide further detail including the applicable measures already detailed in the oCEMP.		
		Unlike the oCEMP, the oDEMP does not specify the use of bunded and impermeable refuelling areas for temporary compounds,			

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		inspection of fuel pipes/outlets, or mitigation of impacts from any necessary discharges to watercourses.			
WR-EA-020	Water Environment	Issue:	Lack of clarity regarding the drainage and pollution mitigation measures for the 132kV Substations and 400kV Substations. Further details are required about penstocks and management of firewater.	On-going. The Applicant's response is noted. We seek clarification of the controls which will be in place to manage the potential for surface water build-up within (and thus reduction in storage capacity of) the separate self-bunded drainage system for the transformers at the 400kV Project Substation.	As part of wider maintenance of the Substation compounds, the surface water runoff transformer tank would be inspected on a regular basis and emptied accordingly depending on available capacity and anticipated weather conditions.
		Impact:	Uncontrolled firewater drainage from substations poses a risk of pollution to the water environment.		
		Solution:	Provide clarity regarding the substation drainage design and management of firewater with		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			automated penstock valves (or similar). Ensure capacity in event of a fire to contain sufficient volumes of firewater to prevent release to environment, ensuring containment until subsequent disposal offsite.		
		Provide a sealed drainage system to adequately contain and manage any firefighting effluent, or contaminated surface waters generated by a fire at the site. This will ensure that there is no discharge of polluted water to ground or surface water bodies. This should include: • Any system for the storage of contaminated firewater should have sufficient capacity to contain reasonable worst-case firewater and rainfall event volumes.			

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		• The system for containing firefighting effluent, eg. penstock valve, should close automatically, with a manual backup system in case of power failure, supported by a maintenance schedule. Confirm the trigger for closing a penstock. • Any equipment, such as oil transformers, should be bunded, where possible. (We note APP-045 Chapter 9, section 9.7.8 says transformers will be selfbunded). • Any contained firefighting water from the separators or SuDS would need to be removed by a specialist to an appropriate offsite treatment facility. We acknowledge that section 9.4.12 of the Outline Surface Water Drainage Strategy says "Due to the presence of Drinking		

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		Water Protection Zones and to manage the potential impact of contamination from surface water runoff it is proposed that the BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable membrane"			
WR-EA-021	BESS	Issue:	In the list of activities that would be required to construct the BESS Area, 'Installation of fire safety measures' is listed last.	Resolved. The Applicant's response is noted and accepted.	The Applicant welcomes this response.
		Impact:	Risk that fire water could be released into the environment if batteries and other equipment are installed on site prior to the construction of fully operational fire safety measures		
		Solution:	Ensure fire safety measures (specifically the sealed drainage with penstock valve),		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			are in place prior to installation of the equipment. oBSMP should confirm that BESS batteries would be removed from site prior to the decommissioning and removal of any fire protection systems and surface water containment systems.		
WR-EA-022	BESS	Issue:	Inadequate detail is provided regarding the management of damaged or end of life batteries. We note that BESS could be replaced up to five times.	On-going. We understand that details of battery operational lifespan will not be determined until the detailed design stage and are satisfied that a reasonable worst-case scenario for replacement frequency has been adopted for the Environmental Statement. We note and are satisfied with the additional text proposed to be added to the	The Applicant has submitted the revised **Outline BSMP [REP1-066]** (paragraph 3.3.16) at Deadline 1 to include content agreed with the Environment Agency.
		Impact:	Batteries can pose a water quality risk if they leak.		
		Solution:	Provide clarity regarding how batteries will be removed during		

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			replacement, and stored after removal prior to being taken offsite for appropriate disposal.	outline BSMP at Deadline 1. We await review of the revised document to resolve this issue.	
WR-EA-023	BESS	Issue:	The surface water drainage system for the BESS will have an auto shutoff valve that activates in the event of the fire alarms sounding, however there is no mention of a manual closing option nor maintenance schedule. Details regarding the testing of captured firewater have not been provided. Water will then likely be tankered away, however alternative disposal options are unclear.	On-going. We note and are satisfied with the additional text proposed to be added to the outline BSMP at Deadline 1. We await review of the revised document to resolve this issue.	The Applicant has submitted the revised **Outline BSMP [REP1-066]** (paragraph 4.5.5) at Deadline 1 to include content agreed with the Environment Agency.
		Impact:	Risk of pollution to the water environment if		

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			potentially contaminated water is not contained and disposed of correctly.		
		Solution:	Provide details about manual penstock operation, testing and maintenance. Once contaminated water is removed, prior to the penstock reopening, the drainage system will need cleaning to ensure there is no potential contaminants which could be resuspended when the drainage system reopens. This should be written into the post-incident recovery plan.		
		We acknowledge that section 9.4.12 of the Outline Surface Water Drainage Strategy states "Due to the presence of Drinking Water Protection Zones and to manage the potential impact of			

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		contamination from surface water runoff it is proposed that the BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable membrane". Section 4.5.9 of OBSMP says "retained water within the isolated drainage and containment system will be sampled and analysed to determine the presence and concentration of contaminants". Sampling should use MCERTS approved methods, be sent to UKAS accredited laboratories and tested against list of hazardous substances (Environmental Quality Standards Directive (EQSD) list for WFD assessments - GOV.UK), in agreement with the Environment Agency. If the Applicant is considering discharging with surface water, after testing, they should be aware it may require a permit: Discharges to surface water and groundwater: environmental permits - GOV.UK		

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		It should be noted that the time taken to issue a Groundwater Activity Permit may be substantial. This is likely to result in significant delays to resuming operation of the BESS or Substation facility and carries a significant risk that further rainfall may result in the drainage system being overwhelmed and a pollution event occurring. We encourage the approach of tankering away the potentially contaminated firewater.			
WR-EA-024	BESS	Issue:	Insufficient detail regarding the management of the aggregate drainage layer and impermeable lining at BESS and Substation sites for surface water attenuation and storage.	On-going. Management of pollution risk at transformers in Project Substation is addressed in response to EA-020. We note that further details of the decontamination process for the aggregate drainage layer and impermeable lining will be provided within the detailed	The **Outline OEMP [REP1-060]** has been updated at deadline 2 to confirm that if the approach is not taken, the drainage system would still fully contain contaminated runoff in the event of a reasonable worst-case fire event. Commitments CWE31 and CWE32 in **Commitments Register [EXAM/7.26]** have been updated at Deadline 2 to reflect the current design.
		Impact:	Risk of pollution from contaminated aggregate if decontamination procedures are		

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			insufficient; or if the impermeable lining is damaged during remedial works.	OEMP at detailed design stage. However, Table 3.4 in the oCEMP should include an outline of the intended approach to controlling the risks from the management of the aggregate drainage layer and impermeable lining, to be expanded upon in the detailed plan(s). The wording of Paragraph 9.11.4 uses the term 'may' in relation to the compartmentalisation of the BESS drainage systems, which does not commit the Applicant to adopting the approach described. It should therefore be confirmed that if this approach is not taken, the drainage system would still fully contain	
		Solution:	Provide details of the proposed measures to decontaminate the impermeable BESS and Substation drainage systems, including the removal and cleaning or replacement as necessary of any components of the drainage system prior to any shut-off valves being re-opened.		
			Where gravel is proposed to be used within an impermeable drainage basin, the operator must demonstrate how they will manage accumulation of silt and pollutants within the base of the gravel.		

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			Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release. These contaminants would then be released into the natural environment over longer periods of time if not removed or decontaminated. The Applicant should also note that water used for decontamination of the drainage system following removal of contaminated firewater would also require management as this would also be potentially contaminated. The Applicant should also demonstrate how they propose to avoid damage to the	contaminated runoff in the event of a reasonable worst-case fire event. Commitments CWE31 and CWE32 in Commitments Register [AS-038] should be updated to reflect the current design.	

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			impermeable lining during any substrate remediation, and how any such damage would be identified and remediated should this occur. We recommend that the Applicant considers zoning of the BESS units, so that a fire in one area does not risk contaminating a larger area, thus requiring more extensive remediation following a fire event. If this occurs during a period of high rainfall this could cause capacity issues and significant disposal costs. Isolatable zones should be easier to manage, enabling unaffected areas of the site to discharge as normal. Section		

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			9.11.4 of Chapter 9 states that the BESS may be split into 'compartments' of battery units with independent lined sub-base areas to help isolate, test and remediate contaminated runoff, which may address this concern. If the drainage aggregate becomes contaminated and may act as an ongoing source of pollution following the removal of contaminated firewater remediation measures may necessitate the temporary local removal of BESS units. We recommend that the BESS design accommodates this possibility.		

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WR-EA-025	Water Environment	Issue:	It is not always clear that the entirety of the surface water drainage infrastructure for the BESS, National Grid Substation and Project Substations would be impermeable and designed to prevent uncontrolled surface water runoff as well as subsurface infiltration.	Resolved. We acknowledge that the Battery Energy Storage Systems (BESS) and Substations will incorporate an impermeable lining beneath the sub-base to prevent infiltration of runoff into the underlying strata, and that surface water will be discharged via flow control to an adjacent watercourse, including a penstock valve to control firewater runoff from the BESS. We acknowledge that transformers have been assessed by the Applicant as the only infrastructure considered to pose a hazardous substance risk to controlled waters, and these will be self-bunded. The Applicant identifies that text	The Applicant welcomes this comment.
		Impact:	Surface water drainage infrastructure at these features may result in uncontrolled discharge of potentially contaminated runoff if design is inadequate.		
		Solution:	It should be clearly stated that the surface water drainage systems at these features would be impermeable and designed to prevent		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			infiltration and uncontrolled surface water runoff. The Applicant should also identify how damage to the impermeable membrane from construction activities such as piling would be avoided. Substations should incorporate measures to ensure that contaminated runoff from plant and equipment containing polluting and hazardous substances, such as oil-filled transformers, would be contained in the event of a fire.	regarding remediation of the BESS drainage system will be provided in the detailed OEMP at detailed design stage. The Environment Agency is a named consultee in the Draft DCO for approval of the drainage scheme (Requirement 11(1)) and Battery Safety Management Plan (Requirement 6(2)).	
		The report states "Due to the presence of Drinking Water Protection Zones and to manage the potential impact of contamination from surface water runoff it is proposed that the			

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		BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable membrane to prevent interaction with the strata underneath."			
WR-EA-026	Management Plans	Issue:	Insufficient detail regarding the content of the site-specific Emergency Response Plan (ERP) which will be secured via the oBSMP. The oCEMP and oDEMP state 'An Emergency Response Plan will include details for pollution prevention' to be prepared at the detailed design stage, however further details should be provided at this stage.	On-going. We acknowledge that the Applicant will update the outline BSMP at Deadline 1 and that the ERP will be provided at detailed design stage. The proposed additional/amended text is acceptable. We await review of the revised document to resolve this issue.	The Applicant has submitted the revised **Outline BSMP [REP1-066]** at Deadline 1 to include content agreed with the Environment Agency.
		Impact:	An ERP is important for managing high risk situations quickly and effectively, and inadequate planning		

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			can increase the risk of environmental damage.		
		Solution:	We request that the Applicant develops this ERP in consultation with the relevant local authority planning officer, emergency services, and the Environment Agency in relation to responding to flood warnings and pollution events. The ERP should identify the importance of notifying downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur. All relevant incident response parties should be made aware of the ERP and		

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			provided with immediate access to it.		
WR-EA-027	Ground Conditions Water Environment	Issue:	Not all internationally designated sites within 1km of the Proposed Development are listed.	Table 9.4 of **ES Volume 1: Chapter 9 – Water Environment [APP-045]** makes reference to Hedenham Wood SSSI (Hedensham Wood SSSI is not recognised and this may be a typographical error in the EA RR response), Fritton Common and Pulham Market SSSIs which are identified as High sensitivity. Fritton Common and Pulham Market SSSIs are identified as GWDTEs in Table 9.4, however it is acknowledged that Hedenham Wood SSSI is not.	The Applicant notes this comment and confirms that Table 9.4 **ES Volume 1, Chapter 9 – Water Environment [APP-045]** will be updated at Deadline 3.
		Impact:	Potential for impacts to some designated sites including Groundwater dependent terrestrial ecosystems (GWDTEs) to be overlooked.		
		Solution:	The Applicant should review the list of designated sites and assess any impacts as necessary.		
		Our records show the following SSSIs within 1km of the Proposed Development have been omitted: • Hedensham Wood SSSI			

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		• Fritton Common SSSI (Listed, but should also be highlighted as a GWDTE) • Pulham Market Big Wood SSSI (Also a GWDTE)			
WR-EA-028	Scheme Description Ground Conditions	Issue:	No Maximum Design Scenario (MDS) values are given for foundation / piling depth for the 132kV Project Substations, or 400kV Project Substation at Sub-Site 1B. Lack of clarity regarding the likely maximum vertical extent of ground disturbance means potential impacts to groundwater cannot be assessed.	Resolved. Applicant's comments are acknowledged.	The Applicant welcomes this comment.
		Impact:	Risk of creating a contamination pathway to groundwater receptors.		

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		Solution:	MDS should be established for all potential pile and foundation structures to allow estimation of interaction with groundwater.		
WR-EA-029	Ground Conditions	Issue:	The programme of replacement activities does not specify the operational lifespan of below ground cabling.	On-going. We recognise that cable repair and/or replacement may be necessary during the operational phase in response to damage and that wholesale cable replacement is not anticipated. We request that for the avoidance of doubt the Applicant confirms whether below ground cabling will have a design lifespan specification commensurate with the duration of the operational phase	The Applicant confirms the below ground cabling will be designed to be operational for the lifespan of the project. Wholesale cable replacement is not anticipated, but there may be ad hoc repair and replacement where necessary.
		Impact:	Potential for cabling to deteriorate and release contaminants into the groundwater environment if not suitably designed.		
		Solution:	The Applicant should confirm that the lifespan of below ground cabling would as a minimum be commensurate with the Operational Phase of the Proposed Development. The		

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			Applicant should commit to review the best practicable environmental option prior to commencement of decommissioning. This should be captured in the Commitments Register.		
		Section 4.6.6 states "The mode of removing the cabling would be dependent upon government policy and good practice at the time. Currently, leaving the cables in situ is seen as the most environmentally acceptable option as it avoids disturbance to overlying land, habitats and neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through the extraction point, leaving the ducting and jointing bays in place. This would avoid the need to open up the entire length			

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		of the cable route." We recommend that the Applicant considers the potential need for future removal as part of the pre-construction design process and where practicable enable cable removal should this be determined necessary at the time of decommissioning.			
WR-EA-030	Water Environment	Issue:	Insufficient evidence provided to discount potential thermal effects on sensitive groundwater receptors.	On-going. We are currently reviewing the additional desk-based assessment and acknowledge that thermal effects from buried cables would only be relevant during the operational phase, with any mitigation measures secured via the final outline OEMP and outline CEMP.	The thermal desk-based assessment is currently being revised following receipt of Environment Agency feedback. The **Outline CEMP [REP1-058]** will be updated at a future deadline as required by the findings of the desk-based assessment.
		Impact:	Potential for thermal plume(s) generated by energised high voltage cables during the Operational phase to impact sensitive groundwater receptors, principally Groundwater Dependent Terrestrial Ecosystems.		

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		Solution:	The Applicant should further assess the potential for significant effects from thermal emissions from buried high voltage electrical cables.		
		The report states that "The thermal dynamics of the sheathed cables are limited to their immediate proximity and therefore will not significantly affect the thermal dynamics" with regard to Fritton Grange Meadows CWS, Lower Spring Wood CWS, peat deposits, watercourses and ditches. No further information is provided to support these statements. Section 9.8.26 assesses impacts of heat pollution from cables during the decommissioning phase. We presume that cabling would be de-energised prior to decommissioning and therefore no longer act as a source of potential thermal pollution. Similarly we presume that until commissioned, buried electrical cables would not			

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		act as a source of heat during the construction phase. The Applicant should consider whether trenchless crossings in areas known to contain peat deposits (i.e. CRC7 crossing) can be targeted to strata underlying the peat, to minimise the potential for thermal effect to cause degradation. An informative is provided at the end of this response, providing further clarification and advice on assessing the potential for thermal impacts to groundwater for this Proposed Development. Any necessary mitigation should be committed to within the outline CEMP.			
WR-EA-031	Water Environment – Water Framework Directive	Issue:	No mitigation is identified to prevent cable trenches from acting as a preferential flow pathway for pollutants or enabling mixing of groundwater units.	On-going. We agree that the measures outlined in the Applicant's response, including ground investigation and the requirement to maintain	Item CGC1 of the **Commitments Register [EXAM/7.26]** has been updated at Deadline 2 to state "*Intrusive ground investigations and assessment will be undertaken prior to construction. The results of the ground*

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		Impact:	New preferential flow pathways could enable mobilisation of contamination, mixing of groundwater bodies and/or affecting groundwater levels in sensitive sites with shallow groundwater such as peat deposits and GWDTEs.	a protocol for managing unexpected contamination, will be sufficient to manage any associated risks posed to controlled waters. Item CGC1 in the Commitments Register (AS 039) should be updated to state that the intrusive ground investigations should include contamination assessment for identified SPCs, and be conducted in accordance with BS10175:2026 and the Environment Agency's Land Contamination Risk Management guidance as referenced in the Applicant's response to item EA-035.	*investigation will be used to inform the detailed design of the Scheme. The ground investigation will cover geotechnical and geoenvironmental matters and will be undertaken in accordance with the relevant standards and guidance, including BS 10175:2026. The ground investigation will include geoenvironmental laboratory analysis of soil and water samples (as appropriate) recovered from within the areas of the identified Sources of Potential Contamination, with the results. The results of the analyses will be assessed as part of a Tier 2 Generic Quantitative Risk Assessment in accordance with the Environment Agency's Land Contamination Risk Management Guidance".*
		Solution:	Provide a commitment that where localised sources of mobile contamination are encountered, commit to use impermeable trench lining and clay stanks or similar to prevent the trench from acting as a new preferential flow pathway. Clay stanks, trench breakers or similar should also be used to prevent distinct shallow groundwater units		

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			from mixing, should these be encountered.		
		Appendix B and Appendix C of the Outline Cable Route Construction Statement presents indicative cross sections of proposed cable installation within trenches. This shows the cables to be set in a blinding layer overlaid by excavated spoil. Both the blinding layer and overlying disturbed soil may act as a preferential flow path for groundwater and/or mobile contamination, where encountered.			
WR-EA-032	Water Environment Ground Conditions	Issue:	Table 9.6 provides a matrix for categorising scale of effect. We do not consider the scale of effect values to be suitable; and the matrix is inconsistent with the equivalent table presented in Chapter 16 – Ground Conditions, despite significant similarities	On-going. We note the Applicant's statement that the assessment of likely effects on the water environment, and therefore the conclusions of the assessment presented in the ES, are not significantly affected by the identified inconsistencies in the	The methodology used is considered appropriate to **ES Volume 1, Chapter 9 – Water Environment [APP-045].** While there may be some crossover between disciplines, the assessment follows a standardised approach accepted through the scoping and PEIR process specific to the Water Environment and it is not considered appropriate or

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			in receptor type and type of impact.	matrix presented in Table 9 6. The matrices presented in Chapters 9 and 16 should be revised to ensure that assessments with overlapping receptors can be directly correlated and all conclusions are clear to the reader.	proportionate to revisit the matrices at this point. The chapter makes it clear as to the receptors and which effects are considered to be significant, and the EA have noted that the conclusions – which confirm there are no significant impacts on the water environment– are not significantly affected by the difference between the matrix for **ES Volume 1, Chapters 9 – Water Environment [APP-045].** and **16 – Ground Conditions [APP-052].**
		Impact:	Scale of effect likely to be underestimated, and the evaluation of otherwise comparable impacts between Water Environment and Ground Conditions chapters is not possible.		
		Solution:	The Applicant should review the scale of effect categories and revise the table(s) accordingly.		
		Using the matrix provided, a one magnitude scale change from 'medium' to 'low' for a 'high' sensitivity receptor results in a two-category severity change from 'major' (significant) to 'minor' (not significant) impact, whereas a similar scale of change for a 'very high' sensitivity receptor results in a one-category severity change. Table 9.6 uses a different number			

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		of sensitivity and magnitude categories to the equivalent table (Table 16.4) in Chapter 16 Ground Conditions, despite significant similarities in receptor type and type of impact.			
WR-EA-033	Water Environment	Issue:	Residual effects for Water supplies (private/public) during the construction and decommissioning phases includes water quantity impacts but does not include water quality impacts from spills and pollutants.	On-going. We are satisfied with this response. We await review of the revised document to resolve this issue.	The Applicant notes this comment.
		Impact:	Residual risk of contamination of water supplies has not been considered.		
		Solution:	Contamination impacts should be included for water supplies (public/private abstractions).		

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WR-EA-034	Water Environment	Issue:	The extents of Source Protection Zones (SPZs) are not accurately described. Public water supplies are not included in Table 6.7 (SPZs for private water supplies are included and assigned Medium sensitivity). Section 9.6.22 incorrectly states that only the northern part of the Order Limits area lies within SPZ3.	On-going. We acknowledge that Chapter 9 paragraph 9.6.22, and definitions of sensitivity with respect to private water supplies, will be updated at a later deadline. We acknowledge that Volume 1 Chapter 9 assesses effects using the worst-case sensitivity groundwater receptors of 'Very High' (SPZ 1) and that these amendments will not have material effects on the conclusions drawn. We await review of the revised document to resolve this issue.	The Applicant notes this comment.
		Impact:	Risk that impacts on public water supplies are not assessed.		
		Solution:	The Applicant should include public water supply SPZs in the assessment, and reflect the presence of SPZ2 and SPZ1 of a public water supply abstraction within the		

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			Study Area close to Site 1/ the BESS and Substations. Private groundwater abstractions should be considered to be High sensitivity receptors. The locations and extents of SPZs relative to the Order Limits and Study Area should be accurately reflected.		
		Although the northern part of the Order Limits is situated within SPZ3, the southwestern portion of the Order Limits, inclusive of key infrastructure including the BESS, NG Substation and Project Substations, is also situated within an SPZ3 and situated within approximately 500m of SPZ1 of a public water abstraction.			
WR-EA-035	Ground Conditions	Issue:	The potential risks of new contamination pathways from historic contamination to private and licensed	On-going. We note the text in the outline CEMP will be updated to include the BESS and NG Substation in	The Applicant notes this comment and will await further response from the Environment Agency following their review of the

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			abstractions may have been underestimated.	addition to Project Substations and look forward to reviewing the changes when available. The Applicant's other comments are noted. We await review of the revised document to resolve this issue.	updated **Outline CEMP [REP1-058]**.
		Impact:	Potential for contamination of private and permitted abstractions.		
		Solution:	The Applicant should provide further information to support this conclusion, and/or commit to additional mitigation.		
		The report refers to the lack of credible linkages between private water abstractions and permitted abstractions – we presume this should refer to linkages between historic sources of contamination (SPCs) and abstractions. Section 3.4.26 of Appendix 16.1 identifies four private water supplies within 250m of former RAF Seething (SPC 2), all of which are indicated to abstract from the Chalk Principal aquifer. The report concludes that as cable trenches would extend to approximately 2.0			

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		metres below ground level (mbgl) and PV Array foundations would extend to approximately 4 mbgl at most, these would be unlikely to create a preferential flow pathway. However, trenchless crossings CRC9A and CRC9B, and the Sub-Site 10C Project Substation could both result in ground disturbance (and possible pathway creation) to a maximum of 12 mbgl. By comparing the locations of potential historic sources of contamination (SPCs) presented in Figure 16.3 and the locations of private water supplies presented in Figure 16.5, we note there are several BGS water wells and EA licensed extractions within the Study Area in locations within, or close to, SPC2 (former RAF Seething). Although this area is indicated to be underlain by Diamicton (Secondary (undifferentiated) aquifer), Figure 16.4 indicates that the maximum design scenario depth of piling for the Site 10 substation (12 mbgl) and maximum design scenario		

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		depth for trenchless drilling (12 mbgl) are close to the minimum recorded thickness of Diamicton in BGS borehole records in that area (12.2m in record TM29NE7). Although the proposed Substation position as indicated in APP059 Figure 4.1 and the location of proposed trenchless crossing CRC9A indicated in Appendix A Sheet 4 of APP-216 Outline Cable Route Construction Statement lies outside the indicative footprint of SPC2 (former RAF Seething), this feature lies within 250m of the proposed Site 10 Substation and within 300m of CRC9A. We consider that these features should be subject to Hydrogeological Risk Assessments informed by local ground investigation to ensure that these works do not create a mobilisation pathway for contamination associated with the SPC, or create a new pathway for spills and leaks during the construction, operation or decommissioning phases to impact groundwater quality.		

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
		Section 3.4.29 identifies two potentially active private groundwater supplies or permitted abstractions at 130m south-west of Sub-Site 7A, which may not abstract from the Chalk Principal aquifer. Impacts to these abstractions from mobilisation of existing contamination were discounted due to the absence of an identified SPC within 250m, however the potential for spills and leaks due to construction, operation and decommissioning of the Proposed Development has not been considered.			
WR-EA-036	Water Environment – Water Framework Directive	Issue:	Risks to the WFD groundwater body (Principal aquifer) from piled/ deep foundations and/or trenchless drilling have not been assessed. These activities could create new preferential flow pathways for contamination during	On-going. We note the text in the outline CEMP will be updated to include the BESS and NG Substation in addition to Project Substations, and that the WFD Assessment will be updated to include reference to piling, trenchless crossings and	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Outline CEMP [REP1-058]** and the updated **Water Framework Directive Assessment [REP1-056]**

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			the construction, operation and decommissioning phases.	embedded mitigation through the Foundation Works Risk Assessment (FWRA). We await review of the revised document to resolve this issue. Based on the Applicant's risk assessment we agree that the need for FWRA for proposed PV arrays within the former RAF Hardwick and RAF Seething airfields can be determined based on the findings of post consent geoenvironmental ground investigation and risk assessment.	
		Impact:	Risk of impacts to water quality in the Principal aquifer.		
		Solution:	The WFD Assessment should account for the potential for migration pathways through the superficial Diamicton deposits. The Applicant should carry out a Foundation Works Risk Assessment (FWRA), informed by local ground investigations to at least the maximum design scenario piling, foundation construction and drilling depth, for all proposed BESS and Substation structures		

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			and trenchless crossings. The selected methodology should avoid creating a migration pathway through any overlying superficial deposits. FWRA should also be produced for PV array foundations in areas potentially affected by contamination such as former RAF Seething, former RAF Hardwick and potentially infilled historic mineral extraction pits. Ground investigation data should be acquired post-consent to inform foundation construction details. This should include assessment of the potential for pollutant pathways through the Diamicton deposits where present.		

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			All trenchless crossings which may interact with Principal or Secondary A aquifers, surface watercourses or sensitive ecological sites should be supported by a Hydrogeological Risk Assessment informed by intrusive ground investigation data. This should be committed to via the outline CEMP.		
		The potential for interaction between deep Substation piling activities and/or trenchless drilling methods, and the underlying Principal aquifer, is of concern. This is of particular concern in areas found to have limited thickness of overlying Diamicton, or where the exploratory hole record is limited, principally for the proposed Project Substations in Sites 4, 5, 7 and 10.			

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		It should be noted that Diamicton deposits (Lowestoft Formation) are not an aquiclude, and by their glacial nature are variable in composition. They may be of generally higher clay content but exhibit spatial variation and can incorporate zones of higher transmissibility where sand lenses and buried channels and valleys are present. It should not be presumed that these deposits would not be capable of transmitting mobile contamination into the underlying Principal aquifer. Section 3.12 of the oCEMP states that a FWRA would be carried out prior to the start of any work associated with Project Substations. This should also apply to the BESS and National Grid Substation. Foundation Works Risk Assessments should be produced in accordance with relevant guidance including CIRIA piling and other foundation guidance and		

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		[redacted]			
WR-EA-037	Ground Conditions	Issue:	The CEMP commitment for a ground investigation prior to construction to inform the detailed design does not include sufficient detail.	On-going. The Applicant's response is noted and accepted. We note that the mitigation measures presented within the outline CEMP and Volume 3 Appendix 1: Phase 1 Ground Conditions Assessment are due to be updated at a future deadline. We await review of the revised document to resolve this issue.	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Outline CEMP [REP1-058]**.
		Impact:	Risk of pollution to groundwater.		
		Solution:	Any intrusive ground investigation should be in accordance with applicable best practice guidance and legislation including BS10175:2026 and the Environment Agency's Land Contamination Risk Management guidance. The ground investigation should:		

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			• assess ground conditions at the maximum design depths for pile/foundation and trenchless crossings; and • include groundwater level monitoring sufficient to establish reasonable worst case baseline condition (i.e. including the winter period).		
WR-EA-038	Ground Conditions	Issue:	The report concludes that construction phase risks for SPCs 1 to 3 are Low, and Moderate for SPC4, as determined by the Preliminary Risk	On-going. We note the text in the outline CEMP will be updated in regard to FWRA. The Applicant's rationale for determining the likely contamination risk	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Outline CEMP [REP1-058]**.

ID	Theme	EA's Relevant Representations Comment		EA Comment for Deadline 1	Applicant's Response
			Assessment (APP-184).	associated with former RAF Hardwick and former RAF Seething is considered appropriate, and we are content that any associated risks would be adequately addressed by the proposed post-consent geoenvironmental ground investigations, contamination watching brief and discovery protocol, and other measures to be secured in the oCEMP. We await review of the revised document to resolve this issue.	
		Impact:	Risks from SPC 2 may be underestimated.		
		Solution:	The Applicant should reassess risks from SPC 2 to sensitive water receptors.		
		SPC 1: former RAF Hardwick SPC 2: former RAF Seething SPC 3: former Market Lane Pit SPC 4: former refuse tip The potential for contamination to be present associated with SPC 1 and SPC 2 is stated to be limited based on the features historically present, and the subsequent 50+ year period of agricultural land use. The potential for highly localised contamination sources such as burial pits cannot be wholly discounted and should be addressed. The development proposals are unlikely to result in structures			

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		penetrating through the Diamicton deposits underlying Site 3 (SPC 1). However, as Substation foundations and trenchless drilling is proposed within 300m of the former RAF Seething footprint, to depths which may penetrate the Diamicton, we consider SPC 2 to pose higher construction phase risks. Regardless, it should not be presumed that no migration pathway through Diamicton deposits would exist where these would not be penetrated due to the potential for local variability in permeability.			
WR-EA-039	Ground Conditions	Issue:	The description of local geology is ambiguous. The report does not differentiate the two indicated 400kV Project Substations in the south-western part of the Order Limits	Resolved. The Applicant's response is noted and accepted.	The Applicant notes this comment.
		Impact:	Risk of unexpected impacts to groundwater if the		

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			local geology is misunderstood.		
		Solution:	The ground conditions at each proposed Substation feature should be clearly defined.		
		Two 400kV Project Substations are indicated in the south-western part of the Order Limits. The southern Project Substation, located adjacent to the BESS, is indicated in BGS 1:50,000 scale mapping to be located above Crag bedrock. The northern Project Substation, located adjacent to the National Grid Substation, is indicated to be located above Chalk bedrock.			
WR-EA-040	Ecology and Biodiversity	Issue:	Short-Term/Temporary effects are defined as 0-2 years. This period is too long in regard to potential impacts on fish.	Resolved. The Applicant has provided a satisfactory response which ensures that the severity of temporary impacts on fish will not be assessed	The Applicant notes this comment.

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		Impact:	A period of two consecutive years could lead to significant impacts to fish populations. If the impact effected spawning or juvenile fish, then this could result in two-year classes being impacted. Consequently, this could have a significant impact on fish populations, and lead to a deterioration in WFD status.	by simply the time span alone, but also on the type of impact, receptor sensitivity, ecological function and reversibility of the impact, this includes 'the nature, scale and extent' of the impact. We also note that mitigation is included to avoid impacts which includes trenchless techniques on sensitive watercourses.	
		Solution:	Assess any activity that takes longer than 6 months as if it were permanent works and put in place mitigation against such effects.		
		Although temporary impacts for BNG are classified as those that can be restored to previous condition within 2 years, internal [EA] guidance regarding WFD for			

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		low risk activities considers short-term as being activities that are 6 months or less in duration, and where effects of those activities undertaken also last less than 6 months. Any activity/action that takes longer or causes an effect longer than 6 months should be assessed as if it were permanent.			
WR-EA-041	Ecology and Biodiversity	Issue:	Table 8.14 describes freshwater fish as being of 'Local' ecological importance, but this does not take into account the importance of the European eel. Eel are a critically endangered and priority species listed under Section 41 of the NERC Act 2006	Resolved. We agree that the majority of waterbodies on site are unfavourable for European eel, and therefore the argument of local importance is agreed on. However, the Hempnall Beck does provide suitable habitat for European eel and therefore according to the EA Eel (England and Wales) Regulations 2009 guidance it should be assumed that European eel will be presence and therefore the Hempnall Beck is of	The Applicant notes this comment.
		Impact:	The significance of impacts on protected fish species may not be adequately assessed.		

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		Solution:	Amend Table 8.14. Fish should be categorised as being of County importance (as defined in Table 8.4 - Geographical Scales of Reference in relation to ecological receptors)	County importance for European eel. That aside we agree that this will not change the overall conclusion of the EIA and that suitable mitigation is in place on the Hempnall Beck i.e. trenchless crossing technique and minimum of 5m depth cable. We have no further comments or concerns.	
WR-EA-042	Ecology and Biodiversity	Issue:	We do not agree with the stated conclusion that operational EMFs from the proposed development are not expected to give rise to any ecologically significant effects on freshwater fish.	Resolved. The confirmation of a design commitment to lay cables at a minimum of 5m below main watercourse satisfies our issue, and we have no further comment or concern.	The Applicant welcomes this comment.
		Impact:	There is a risk that residual magnetic fields from buried cables may be strong enough to impact on		

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			European eel behaviour.		
		Solution:	Provide reassurance that the proposed cable burial depth will ensure that magnetic field strength is reduced to below 12 microtesla at the bed of the watercourse, thereby adopting a precautionary approach to avoid potential impacts on European eel.		
		There is evidence that Anguillid species can detect magnetic fields as low as 12microtesla. The applicant has indicated that magnetic field strength will be approximately 95microtesla at 1 m above ground and recognises that this strength attenuates rapidly with distance.			
WR-EA-043	Ecology and Biodiversity	Issue:	The oLEMP does not include reference to the riparian	Resolved. We are encouraged to see that the applicant will	The Applicant notes this comment.

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			enhancements and reduced encroachment that are specified within the BNG report.	permanently maintain riparian buffer strips onsite, of 10m minimum, where there is no encroachment from either the array or access tracks. This would also generate an uplift in watercourse units from reducing encroachment value where land was previously under agriculture.	
		Impact:	Management or enhancement opportunities for riparian habitats may be overlooked. For example, addressing extensive invasive species issues (Himalayan balsam) which is acknowledged to contribute to poor condition of Hempnall Brook.		
		Solution:	Secure riparian habitat enhancements in the oLEMP, in line with the commitments made in the BNG report. Include explicit measures to check for		

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			and manage invasive species.		
WR-EA-044	Ecology and Biodiversity	Issue:	The potential for aquatic invertebrates to be attracted to solar panels has not been addressed.	Resolved. The Applicant's response is noted.	The Applicant notes this comment.
		Impact:	Risk of interrupted lifecycle of aquatic invertebrates.		
		Solution:	It is acknowledged that the outline masterplan does not appear to have solar modules in close proximity to the watercourse, but these wider buffers do not appear to be secured (noting the commitment to only 10m stand off from watercourses within appendix 7.78 Design Principles, Parameters and Commitments). Secure wider buffers		

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			to watercourses potentially supporting diverse invertebrate communities within oLEMP and Appendix 7.78.		
		The aquatic ecology report identified that Hempnall Beck could support diverse invertebrate communities. There is evidence that aquatic invertebrates are attracted to horizontally polarised light (as reflected from water bodies and solar panels) and that they use this as stimulus to induce egg laying.			
WR-EA-045	Scheme Description	Error: There is an inconsistent approach to the listing of active and historic landfills within 1km of the Order Limits. Some landfills are listed multiple times, sometimes with different names or no name provided, and it is not always clear whether a referenced landfill is historic or authorised. Howe Pits is included in the list but		Resolved. The Applicant's response is noted. We recognise that the identification and description of landfills given within Volume 3 Appendix 16.1 is accurate and this information has been considered in the assessment presented in Volume 1 Chapter 16,	The Applicant notes this comment.

ID	Theme	EA's Relevant Representations Comment	EA Comment for Deadline 1	Applicant's Response
		is situated over 1km from the Order Limits.	and that Volume 1 Chapter 3 Section 3.4.24 directs readers to these documents for full baseline ground conditions information including landfills. We advise that the list provided in Chapter 3 is updated for the sake of clarity	
WR-EA-046	Water Environment – Water Framework Directive	Error: The WFD Groundwater body present beneath the site, 'Broadland Rivers Chalk and Crag Water Body', is described as being classified as 'Poor' ecological status. This is incorrect as Ecological status is not used to classify groundwater bodies. The overall classification of WFD Groundwater bodies is based on the lower of two categories – chemical status and quantity.	On-going. We agree that the error does not materially affect the conclusions of the Water Framework Directive Assessment but request that this is corrected at a future deadline for the sake of accuracy.	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Water Framework Directive Assessment [REP1-056]**
WR-EA-047	Ground Conditions	Error: All bedrock lithologies are described as Secondary (undifferentiated) aquifers, creating the risk that the significance and sensitivity of the bedrock aquifers	On-going. Error in table to be corrected at a future deadline. We acknowledge that the error does not impact	Table 16.7 of **Chapter 16 – Ground Conditions [APP-052]** will be updated at Deadline 3 to

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		underlying the site are under represented. The bedrock lithologies should be identified as Principal aquifer. However, this error has not been carried through in the Phase 1 Preliminary Risk Assessment.	the significance of identified effects.	provide corrected aquifer classifications.
WR-EA-048	Ground Conditions	Error: APP-052 Tables 16.5 and 16.6 and APP-184 Table 3.1 present a summary of superficial geology present on the site. This does not identify the presence of Alluvium within Sub Site 8B, as is indicated on British Geological Survey mapping.	On-going. We agree that the omission does not impact the conclusions of the risk assessment due to the presence of a higher sensitivity receptor (bedrock Principal aquifer). Volume 1 Chapter 16 should be amended at a future deadline for the sake of accuracy.	Table 16.5 of **Chapter 16 – Ground Conditions [APP-052]** will be updated at Deadline 3 to include for the presence of Alluvium within sub-Site 8B.
WR-EA-049	Management Plans	Error: Table 4.4 states that "A Foundation Works Risk Assessment will be completed prior to the start of any work associated with the foundations of the Project Substations, supported by the Ground Investigation data." This should refer to the National	On-going. We are pleased to note that the assessment of likely significant effects has been developed considering embedded mitigation for the NG Substation and BESS in	The Applicant notes this comment and will await further response from the Environment Agency following their review of the updated **Outline CEMP [REP1-058]**.

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		Grid Substation. Error: Table 4.12 states that "A Foundation Works Risk Assessment will be undertaken post-consent for structures requiring deep foundations and/or piling such as the Project Substations." This should refer to the National Grid Substation. Possible error: Table 4.18 states that "The relevant risk assessments for safety during construction will be required and produced by the Contractor prior to decommissioning, which will be implemented to minimise the risk of accidents and disasters." We presume the reference to decommissioning is an error	addition to the Project Substations, and that these will be included in an updated version of the oCEMP, along with a correction of the identified error in Table 4.18.	
WR-EA-050	Ground Conditions	Error: Probable typographical error: "The peat is considered likely to be in continuity with the peat…"	On-going. The Applicant's response is noted. This should be corrected in a future revision of Volume 1 Chapter 16.	**Chapter 16 – Ground Conditions [APP-052]** will be updated at Deadline 3 to state "*The peat is considered likely to be in hydraulic continuity with the underlying Alluvium and Leet Hill Sand and Gravel Member*".

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WR-EA-051	Decommissioning	Error: Table 5.4 and Table 5.12 refer to the use of an Emergency Response Plan and other pollution avoidance measures for decommissioning of the National Grid Substation and Grid Connection infrastructure. However, the National Grid Substation and Grid Connection Infrastructure are understood to be intended to remain in situ and presumably not subject to decommissioning activities.	Resolved. The Applicant's response is noted and accepted.	The Applicant welcomes this comment.
WR-EA-052	Water Environment	Error: Table 9.3 showing the sensitivity criteria of identified receptors does not include Groundwater Dependent Terrestrial Ecosystems (GWDTEs). GWDTEs are subsequently listed in Table 9.4 as 'High' sensitivity receptors. Note that Appendix 16.1 – Phase 1 Ground Conditions Assessment identifies and assesses GWDTEs within the Study Area. We consider Fritton Grange Meadows should also be assessed as a potential GWDTE.	Resolved. The Applicant's response is noted and accepted.	The Applicant notes this comment and Table 9.4 of **ES Volume 1, Chapter 9 – Water Environment [APP-045]** will be updated at Deadline 3to include GWDTEs.

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WR-EA-053	Ground Conditions Water Environment	Informative: Karstic features in chalk bedrock	Resolved.	The Applicant notes this comment.
WR-EA-054	Water Environment	Informative: Sustainable Drainage Systems (SuDS)	Resolved.	The Applicant notes this comment.
WR-EA-055	Ground Conditions Water Environment	Informative: Composition of drilling fluids	Resolved.	The Applicant notes this comment.
WR-EA-056	Ground Conditions	Informative: Fire Suppressant Chemicals	Resolved.	The Applicant notes this comment.
WR-EA-057	Water Environment	Informative: Assessing Thermal Effects from Buried Cables	Resolved.	The Applicant notes this comment.
WR-EA-058	Ecology and Biodiversity	Error: Table 2.1 mentions coarse fish, eel and lamprey, but does not include specific reference to habitat usage by salmonid fish species. Salmonids spawn in gravel, seek cover in marginal features and woody material, and could be impacted by artificial structures. We accept that the habitat features used by salmonids are already identified as of	Resolved.	The Applicant notes this comment.

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		importance for other fish species, but we consider that salmonids should be specifically included.		
WR-EA-059	Ecology and Biodiversity	Error: Table 8.4 refers to priority species under NERC Act. Priority species are not listed under Section 31 as stated, but under Section 41. This needs to be amended.	Resolved.	The Applicant notes this comment.
WR-EA-060	Groundwater SPZs (Ch9)	Additional point for consideration	The following point was not raised in our Relevant Representation, and is highlighted here for the first time. Chapter 9 Section 9.6.22 currently states that the northern part of the Order Limits is located within a Groundwater Source Protection Zone (SPZ) 3…the remaining area of the Order Limits is outside of the SPZ boundary. The Applicant should note that the south-western	The Applicant notes this comment and has committed to provide the requested updates at Deadline 3 as mentioned in the **Statement of Common Ground with Environment Agency [REP1-087]** under item EA-WE-10.

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			portion of the Proposed Development also lies within a SPZ 3, and should amend the chapter accordingly and ensure that the potential for impacts to that SPZ have been taken into account in the assessment.	