East Pye Solar

Applicant's Response to Submissions Received at Deadline 1 – Members of the Public

Revision 1

October 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/9.34

The Infrastructure Planning (Examination Procedure) Rules 2010

Contents

1 Introduction 4

1.1 Purpose of the document 4

1.2 Structure of the Report 4

2 The Applicant's Response to Persons Whose Interests would be Affected by The Order 17

2.1 Anne Fry 17

2.2 Brian Stephen Reynolds 19

2.3 Caroline Ramsay 21

2.4 Catherine Mary Cunningham-Elliot 35

2.5 Catherine Scott 41

2.6 Cathy Harvey 46

2.7 Charlotte Mary Harrison 54

2.8 Clare Turner 55

2.9 Colleen Hayter 57

2.10 David and Anne Lloyd 58

2.11 Deborah Adams 59

2.12 Durrants on behalf of David and Elaine Wilson, John Ellis, Jonathan Cole, Pamela Wright, Ralph Penn, and the Thacker Family 63

2.13 Heather Smith 72

2.14 Helen Pye 74

2.15 John Robert Cawston 87

2.16 Kathleen Reynolds 88

2.17 Kevin Michael Haslam 92

2.18 Matthew David Scott 94

2.19 Neville Earl 98

2.20 Nigel Stringer 103

2.21 Patricia Leate 106

2.22 Pauline Earl 113

2.23 Peter Chapman 119

2.24 Philip Bolus 122

2.25 Professor Anne Marie Minihane 126

2.26 Rachel Andrews 130

2.27 Robert James Hazell 135

2.28 Stuart Gooderham 139

2.29 Stephen Paul Leate 143

2.30 Suzanne Clarke 149

2.31 The Wright Family 158

2.32 Yvonne Davy 160

2.33 Zoe Patricia Marie Cawston 162

3 The Applicant's Response to Deadline 1 Submissions by Theme 164

3.1 The DCO Process 164
3.2 Consultation and Engagement 179
3.3 The Applicant 193
3.4 Energy Need and Grid Connection 201
3.5 Scheme Description, Draft DCO and Principles, Parameters and Commitments 209
3.6 EIA Methodology and Commitments Register 219
3.7 Construction and Decommissioning 222
3.8 Site Selection, Alternatives and Design Evolution 232
3.9 Climate Change and Greenhouse Gases 248
3.10 Landscape and Visual 254
3.11 Lighting 287
3.12 Ecology and Biodiversity 289
3.13 Arboriculture 311
3.14 Water Environment 316
3.15 Cultural Heritage 333
3.16 Recreation and Public Rights of Way 353
3.17 Transport and Access 361
3.18 Air Quality 379
3.19 Socio-Economics 381
3.20 Soils and Agricultural Land 388
3.21 Ground Conditions 393
3.22 Noise and Vibration 398
3.23 Electromagnetic Fields 403
3.24 Major Accidents and Disasters 405
3.25 Telecommunications, Utilities and Television 407
3.26 Glint and Glare 409
3.27 Human Health and Equalities 411
3.28 Aviation 416
3.29 Battery Safety 418
3.30 Cumulative and In-Combination Effects 424
3.31 Community Benefits 427

Tables

Table 1.1 List of Acronyms of Submission Documents 5
Table 1.2 List of Organisations whose Deadline 1 Submissions are Responded to in Section 2 6
Table 1.3 List of Deadline 1 Submissions received from members of the public and businesses responded to in Section 3 9
Table 2.1 Applicant's Response to Anne Fry [REP1-331] 17
Table 2.2 Applicant's Response to Brian Stephen Reynolds [REP1-361] 19
Table 2.3 Applicant's Response to Caroline Ramsay [REP1-296] 21
Table 2.4 Applicant's Response to Catherine Mary Cunningham-Elliot [REP1- 264] 35
Table 2.5 Applicant's Response to Catherine Scott [REP1-304] 41
Table 2.6 Applicant's Response to Cathy Harvey [REP1-429] 46
Table 2.7 Applicant's Response to Charlotte Mary Harrison [REP1-338] 54
Table 2.8 Applicant's Response to Clare Turner [REP1-209] 55

Table 2.9 Applicant's Response to Colleen Hayter [REP1-274] 57
Table 2.10 Applicant's Response to David and Anne Lloyd [REP1-417] 58
Table 2.11 Applicant's Response to Deborah Adams [REP1-486] 59
Table 2.12 Applicant's Response to Durrants on behalf of AJ Alexander & Sons [REP1-218], C G Moore & Sons [REP1-219], David and Elaine Wilson [REP1-220], John Ellis [REP1-221], Jonathan Cole [REP1-222], Pamela Wright [REP1-223], Ralph Penn [REP1-224] and the Thacker Family [REP1-225] 63
Table 2.13 Applicant's Response to Heather Smith [REP1-285] 72
Table 2.14 Applicant's Response to Helen Pye [REP1-363] 74
Table 2.15 Applicant's Response to John Robert Cawston [REP1-140] 87
Table 2.16 Applicant's Response to Kathleen Reynolds [REP1-432] 88
Table 2.17 Applicant's Response to Kevin Michael Haslam [REP1-143] 92
Table 2.18 Applicant's Response to Matthew David Scott [REP1-306] 94
Table 2.19 Applicant's Response to Neville Earl [REP1-379] 98
Table 2.20 Applicant's Response to Nigel Stringer [REP1-340] 103
Table 2.21 Applicant's Response to Patricia Leate [REP1-244] 106
Table 2.22 Applicant's Response to Pauline Earl [REP1-380] 113
Table 2.23 Applicant's Response to Peter Chapman [REP1-321] 119
Table 2.24 Applicant's Response to Philip Bolus [REP1-255] 122
Table 2.25 Applicant's Response to Professor Anne Marie Minihane [REP1-397] 126
Table 2.26 Applicant's Response to Rachel Andrews [REP1-456] 130
Table 2.27 Applicant's Response to Robert James Hazell [REP1-300] 135
Table 2.28 Applicant's Response to Stuart Gooderham [REP1-332] 139
Table 2.29 Applicant's Response to Stephen Paul Leate [REP1-314] 143
Table 2.30 Applicant's Response to Suzanne Clarke [REP1-163] 149
Table 2.31 Applicant's Response to The Wright Family [REP1-133] 158
Table 2.32 Applicant's Response to Yvonne Davy [REP1-364] 160
Table 2.33 Applicant's Response to Zoe Patricia Marie Cawston [REP1-135] 162
Table 3.1 The DCO Process 164
Table 3.2 Consultation and Engagement 179
Table 3.3 The Applicant 193
Table 3.4 Energy Need and Grid Connection 201
Table 3.5 Scheme Description, Draft DCO and Principles, Parameters and Commitments 209
Table 3.6 EIA Methodology and Commitments Register 219
Table 3.7 Construction and Decommissioning 222
Table 3.8 Site Selection, Alternatives and Design Evolution 232
Table 3.9 Climate Change and Greenhouse Gases 248
Table 3.10 Landscape and Visual 254
Table 3.11 Lighting 287
Table 3.12 Ecology and Biodiversity 289
Table 3.13 Arboriculture 311
Table 3.14 Water Environment 316
Table 3.15 Cultural Heritage 333
Table 3.16 Recreation and Public Rights of Way 353
Table 3.17 Transport and Access 361
Table 3.18 Air Quality 379
Table 3.19 Socio-Economics 381
Table 3.20 Soils and Agricultural Land 388
Table 3.21 Ground Conditions 393
Table 3.22 Noise and Vibration 398
Table 3.23 Electromagnetic Fields 403
Table 3.24 Major Accidents and Disasters 405
Table 3.25 Telecommunications, Utilities and Television 407
Table 3.26 Glint and Glare 409
Table 3.27 Human Health and Equalities 411
Table 3.28 Aviation 416
Table 3.29 Battery Safety 418
Table 3.30 Cumulative and In-Combination Effects 424
Table 3.31 Community Benefits 427

1 Introduction

1.1 Purpose of the document

1.1.1 This document provides East Pye Solar Limited's (the 'Applicant's') response to relevant documents submitted by members of the public and those whose interests would be affected by the Order (as listed within the **Book of Reference [REP1-018]**) on 6 October 2026, relating to Examination Deadline 1 for the Development Consent Order (the 'Application') for East Pye Solar (the 'Scheme').

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

1.1.3 The Applicant notes that Interested Parties submitted suggestions for site inspection locations at Deadline 1. The Applicant has considered all suggestions for the Accompanied Site Inspection in the second revision of the **Applicant's Draft Itinerary for the Accompanied Site Visit [EXAM/9.1]** which will be submitted at Deadline 2.

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 submissions received at Deadline 1 from those whose interests would be affected by the order (as listed within the **Book of**

Reference [REP1-018]). These submissions are responded to in full in **Section 2** of this document.

- **Table 1.3** lists the Theme Options in which Deadline 1 submissions received from members of the public and businesses are categorised into and responded to in **Section 3** of this document.

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

Table 1.1 List of Acronyms of Submission Documents

Acronym	Document
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
EqIA	Equality Impact Assessment
DAD	Design Approach Document
PMIE	Potential Main Issues for Examination
BNG	Biodiversity Net Gain
Shadow HRA	Shadow Habitat Regulations
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 Organisations whose Deadline 1 Submissions are Responded to in Section 2

Examination Library Ref	Acronym	Submission Received from	Plot numbers (if applicable)
REP1-331	AF	Anne Fry	03-001
REP1-361	BSR	Brian Stephen Reynolds	03-001
REP1-296	CR	Caroline Ramsay	12-009
REP1-264	CMCE	Catherine Mary Cunningham-Elliot	Category 3 Persons
REP1-304	CS	Catherine Scott	13-004
REP1-429	CH	Cathy Harvey	03-001
REP1-338	CMH	Charlotte Mary Harrison	03-001
REP1-209	CT	Clare Turner	04-030
REP1-274	CH	Colleen Hayter	Category 3 Persons
REP1-168 REP1-417	DAJ	D & AJ Pointer	Category 3 Persons
REP1-486	DA	Deborah Adams	Category 3 Persons
REP1-220	DUR	Durrants on behalf of David and Elaine Wilson	15-010, 15-011, 15-014, 15-015, 15-016, 15-018, 15-019, 15-021, 15-024, 15-025, 15-027, 15-028, 15-031
REP1-221	DUR	Durrants on behalf of John Ellis	07-022, 08-014, 08-015, 08-016, 11-001, 11-002, 11-003, 11-005, 11-006, 11-009
REP1-222	DUR	Durrants on behalf of Jonathan Cole	17-034, 17-032, 17-037, 18-008, 18-012, 18-013, 18-014
REP1-223	DUR	Durrants on behalf of Pamela Wright	19-008, 19-009, 19-011, 19-012
REP1-224	DUR	Durrants on behalf of Ralph Penn	08-014, 11-001, 11-002, 11-005, 11-006, 11-009

Examination Library Ref	Acronym	Submission Received from	Plot numbers (if applicable)
REP1-225	DUR	Durrants on behalf of The Thacker Family	Andrew John Thacker - 16-004, 16-005, 16-006, 16-007, 16-009, 16-010, 16-011, 16-012, 16-013, 16-014, 16-017, 16-018, 16-019, 16-020, 16-021, 16-022, 16-023, 16-024, 16-025, 16-026, 16-027, 17-002, 17-007, 17-008, 17-011, 17-012 Ivan Walter Thacker - 16-004, 16-005, 16-007, 16-008, 16-009, 16-011, 16-013, 16-014, 16-015, 16-016, 16-017, 16-018, 16-019, 16-020, 16-021, 16-022, 16-023, 16-024, 16-025, 16-026, 16-027, 17-002, 17-007, 17-008, 17-011, 17-012 Julia Elizabeth Thacker - 16-004, 16-005, 16-009, 16-011, 16-017, 16-018, 16-019, 16-020, 16-021, 16-022, 16-023, 16-024, 16-025, 16-026, 16-027, 17-002, 17-007, 17-008, 17-011, 17-012 WS & IW Thacker - 16-004, 16-005, 16-009, 16-011, 16-018, 16-019,

Examination Library Ref	Acronym	Submission Received from	Plot numbers (if applicable)
			16-020, 16-021, 16-023, 16-024, 16-027, 17-007, 17-008
REP1-285	HS	Heather Smith	Category 3 Persons
REP1-363	HP	Helen Pye	03-001
REP1-140	JRC	John Robert Cawston	02-010
REP1-432	KR	Kathleen Reynolds	03-001
REP1-143	KMH	Kevin Michael Haslam	02-001, 02-005
REP1-306	MDS	Mathew David Scott	13-004
REP1-379	NE	Neville Earl	09-021
REP1-340	NS	Nigel Stringer	13-006
REP1-244	PL	Patricia Leate	03-001
REP1-380	PE	Pauline Earl	09-021
REP1-321	PC	Peter Chapman	03-007
REP1-255	PB	Philip Bolus	03-001
REP1-397	PAMM	Professor Anne Marie Minihane	03-001
REP1-456	RA	Rachel Andrews	09-021
REP1-300	RJH	Robert James Hazell	03-001
REP1-314	SPL	Stephen Paul Leate	03-001
REP1-332	SG	Stuart Gooderham	17-001, 17-007, 17-007, 17-008, 17-008, 17-012
REP1-163 REP1-453	SC	Suzanne Clark	18-018, 18-026, 18-025
REP1-133	WF	The Wright family	Richard Wright - 19-011 Pamela Anne Mary Wright - 19-008, 19-009, 19-011, 19-012 Elizabeth Wright - 19-008, 19-007, 19-009

Examination Library Ref	Acronym	Submission Received from	Plot numbers (if applicable)
			Christopher Gerald Wright - 17-015, 17-020, 17-022, 17-029, 19-001, 19-002, 19-003, 19-007, 19-008, 19-009, 19-010 Christopher John Wright - 17-015, 17-020, 17-022, 17-029, 19-001, 19-002, 19-003, 19-008, 19-009, 19-010
REP1-364	YD	Yvonne Davy	Category 3 Persons
REP1-135	ZPMC	Zoe Patricia Marie Cawston	02-010

Table 1.3 List of Deadline 1 Submissions received from members of the public and businesses responded to in Section 3

Examination Library Ref	Submission Received from
REP1-117	Christine Beacom
REP1-118	Dawn Chrystal on behalf of Derek Jessett deceased
REP1-119	Sarah Shipley
REP1-121	Tara Gillam
REP1-122	Victoria Chandler
REP1-123	Susan Laws
REP1-124	Kim Dyke
REP1-126	Andrew Robert Gibson
REP1-127	Matthew Cawston
REP1-128	Elizabeth Rose
REP1-129	Loretta Dunmore
REP1-130	Richard Dunham
REP1-131	Simon Wood
REP1-132	Keith Stubbings
REP1-134	Martin Chandler
REP1-137	Ian James Nelson
REP1-138	David Hook

Examination Library Ref	Submission Received from
REP1-139	Jonathan Allen
REP1-141	Annabel J Brooke
REP1-142	Teresa Susan Stevens
REP1-144	Michael Haslam
REP1-145	Nicola Savage
REP1-146	Karen Ward
REP1-147	Robin Frampton
REP1-148	Geoffrey James Blyth
REP1-149	Melissa Taylor
REP1-150	Allison Cotes
REP1-151	Carina Powney
REP1-152	Phillipa Jane Palmer
REP1-153	Rachael Hill
REP1-154	Tony Hall
REP1-155	Andrew Robert Gibson
REP1-159	Gillian Marklew Allen
REP1-160	Gillian Marklew Allen
REP1-161	Stephen Hewitt
REP1-162	Simon Wood
REP1-164	Ashley Rowe
REP1-166	Rachel Clare Shreeve
REP1-167	Simon Beacom
REP1-169	Clair Louise Burrows
REP1-170	Dr Emma Harrold
REP1-171	Erika Webster
REP1-172	Simon Randell
REP1-173	Nicola Eastell
REP1-174	Patricia Coffey
REP1-175	John Henderson
REP1-176	Abigail Holden
REP1-177	Bradley Collins
REP1-178	Mark Worley
REP1-179	Dr and Mrs Michael and Anne Dinsdale
REP1-180	Beverley Wilding
REP1-182	George Boyd
REP1-183	Richard Dunham
REP1-185	Susanna Claire Cooper
REP1-187	Deborah Jayne White

Examination Library Ref	Submission Received from
REP1-188	Fiona Jane Webb
REP1-190	Tara Gillam
REP1-193	Ronnie Trickett
REP1-194	Mark Robert Charles Williams
REP1-195	Heidi Martin
REP1-196	Roy Martin
REP1-198	Christine Beacom
REP1-199	Gillian Marklew Allen
REP1-200	Tara Gillam
REP1-201	Beverley Price
REP1-202	Andrea Snowden
REP1-203	Dr Emma Harrold
REP1-204	Michael Phillips
REP1-205	Ian Neave
REP1-206	Susan Neave
REP1-207	Alyson Read
REP1-208	Simon Wood
REP1-209	Clare Turner
REP1-210	Georgia Kelly
REP1-214	Matthew Johnson
REP1-215	Amanda Dunham
REP1-217	Carrie Burridge
REP1-226	Jennifer Clarke
REP1-227	Joan Cann
REP1-237	Gillian Marklew Allen
REP1-238	Gillian Pyke
REP1-239	Jane Garrec
REP1-240	Kathleen Amanda Thomson
REP1-241	Margaret Stone
REP1-242	Mauricette Wilkinson
REP1-243	Melanie Barrow
REP1-245	Ross Jolliffe
REP1-246	Stephen Christopher Bamber
REP1-247	Stuart Shearer
REP1-252	Keith Bailey
REP1-253	Carol Bailey
REP1-256	Jane Shearer
REP1-257	Christine Abbott

Examination Library Ref	Submission Received from
REP1-258	Mark Holtom
REP1-259	Donna Rae Walls
REP1-260	Sarah Riches
REP1-261	Joseph Giffard Tutt
REP1-262	Sarah Herrell
REP1-263	Luke Giffard Tutt
REP1-265	Michael Knights
REP1-266	James Quinn
REP1-268	Jeanette Walpole
REP1-270	Alexandra Ferguson
REP1-271	Mark Ferguson
REP1-272	Angela Pyke
REP1-275	Andy Hall
REP1-276	Penelope Whiting
REP1-277	Keith Stubbings
REP1-278	Marion Playford
REP1-279	Katie Long
REP1-280	Mark Woods
REP1-281	Lynn Woods
REP1-282	Anthony James Newman and Jeanette Margaret Newman
REP1-283	Zoe Addison
REP1-284	Lesley Oldfield
REP1-286	Sara Worley
REP1-287	Carole Bryant
REP1-288	Michael Sidney Turner
REP1-289	Julie Graham
REP1-290	Richard Gilson
REP1-291	Christine Anne Gilson
REP1-297	William Walker
REP1-301	Valerie Jean Nevill
REP1-302	Victoria Chandler
REP1-303	Ben Hastings
REP1-305	Jill Leithall
REP1-307	Stuart Oliver Leate
REP1-308	Barbara Ives
REP1-309	GDPR-ESP -019
REP1-310	Miriam Elston

Examination Library Ref	Submission Received from
REP1-311	Rebecca Smith
REP1-312	Katherine Hart
REP1-313	Felim Shanaghy
REP1-315	Jacqueline Freear
REP1-316	David Ledsham
REP1-317	David Edleston
REP1-318	Christopher Laxton
REP1-319	Nigel Heller
REP1-320	Zoe Beeson
REP1-324	Rebecca Anne Elizabeth Taylor
REP1-325	Robert Stuart Taylor
REP1-326	Carolyn Robinson
REP1-327	Dianne Linda Gibson
REP1-330	Andrew Neal Burrage
REP1-333	Nicholas John Burrows
REP1-334	Michael Frederick Pye
REP1-335	Dawn Jennifer McDonald
REP1-336	Anthony Richard McDonald
REP1-337	Louise Adamson
REP1-339	Rebecca Taylor
REP1-341	Glyn Luff
REP1-342	Jane Bignell
REP1-343	Mark Hall
REP1-344	Julie Ann Trafford
REP1-345	Kenneth David O'Leary
REP1-346	Donna Asbey
REP1-347	David Fine
REP1-348	Mary Jean Brown
REP1-349	Jon and Lucy Nott
REP1-350	John Trafford
REP1-351	Hilary Battye
REP1-352	Simon Taylor
REP1-353	Robin Howell
REP1-354	Lesley Helen Nelson
REP1-355	Melanie Hook
REP1-356	Miles Savage
REP1-357	Roy Martin
REP1-359	Howard Bolton

Examination Library Ref	Submission Received from
REP1-360	Trevor Lynch
REP1-365	Clive Edward Davies
REP1-366	Peter Charles Cotes
REP1-367	Richard James Flindell
REP1-369	Paul Arthur Playford
REP1-371	Bridget Pestell
REP1-372	Lucinda Popp
REP1-373	Angela Mary Johns
REP1-374	Louise Elizabeth Thurgar
REP1-375	John Parker
REP1-376	Dominic House
REP1-377	Christopher Humphrey
REP1-378	Jenny Harrold
REP1-381	Topcroft Ceramics
REP1-382	Julie Saunders
REP1-400	Kathleen Amanda Thomson
REP1-405	Jane Shearer
REP1-406	Dr Emma Harrold
REP1-407	Ann Margaret Stothard
REP1-408	Lester Saunders
REP1-409	Mrs Jo McGuire
REP1-410	Michael Spender
REP1-411	Mike Shaw
REP1-412	Rosemary Page-Davies
REP1-413	Katherine Elizabeth Shaw
REP1-414	Frances Wallis
REP1-415	Linda O'Leary
REP1-416	Alan and Julie Graham
REP1-419	Jacqueline Mowforth
REP1-420	Victoria Kirk
REP1-421	Vivien Alice Nicholds
REP1-422	Chris Gilson
REP1-423	Janet Vidler
REP1-424	John Gilson
REP1-425	Melanie Barrow
REP1-426	Allyson Rae
REP1-427	Brian Beadle
REP1-431	Jennifer Johnson

Examination Library Ref	Submission Received from
REP1-433	Louise Adamson
REP1-434	Martin James Collier
REP1-437	Richard Snowden
REP1-438	Stuart Shearer
REP1-439	Stephen Michael Dell
REP1-440	Stephen Leithall
REP1-441	Stephen Asbey
REP1-443	Sandra Mullett
REP1-444	Stephanie Howard Wilsher
REP1-445	Ethan Quinn
REP1-446	Judith Olivier
REP1-448	Hannah Giffard
REP1-449	Lisa Quinn
REP1-450	Dr Annetta Berry
REP1-451	Carolyn Robinson
REP1-454	David Palmer
REP1-457	Rob Shipway
REP1-458	Sally Lynch
REP1-459	Stephen Tunmore
REP1-461	Garden Studio at Park Farm
REP1-462	Annetta Berry
REP1-463	Melanie Nixon
REP1-464	Gary Starman
REP1-465	Stephanie Howard Wilsher
REP1-466	Robert Spamer
REP1-467	Garden Studio at Park Farm
REP1-468	Garden Studio at Park Farm
REP1-469	Susan Elizabeth Cane
REP1-470	Jeanette Walpole
REP1-471	Colin John Walpole
REP1-472	Samantha Streamer
REP1-473	Nicola Eastell
REP1-475	Paul Dunmore
REP1-477	Keith Travis
REP1-478	Andrew Scarsbrook
REP1-479	Joanna Emms
REP1-480	David Mullett
REP1-481	Debbie Ashford

Examination Library Ref	Submission Received from
REP1-482	Jill Leithall
REP1-483	Mark Fisher
REP1-484	Chris Lacey
REP1-485	Cathryn Waldron
REP1-486	Deborah Adams
REP1-487	Jane Garrec
REP1-488	Victoria Kirk

2 The Applicant's Response to Persons Whose Interests would be Affected by The Order

2.1 Anne Fry

Table 2.1 Applicant's Response to Anne Fry [REP1-331]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-AF-001	Transport and Access Noise and Vibration	Our wall, the curtilage of a grade 2 star listed property, The Old Rectory, designed by Sir John Soane, will be threatened by the route, as will other properties along Church Hill e.g. Orchard View Barn outbuilding. The narrowest point of the route is 4.11 metres wide; the AIL vehicle is 4.86 metres wide. However, the swept path map does not adequately address this issue e.g. required overhangs (Transport Assessment Part 3, page 58). I note that the applicant states that the physical environment will need to be modified (tree canopies trimmed and railings removed); may we please know who will be responsible for any harm to the conservation setting and restoring the landscape? I am particularly concerned about the physical risk to	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • Concerns regarding the pavement area need The Street and the side of the War Memorial in Saxlingham Nethergate under WR-CON-017 in Table 3.7. • Heritage matters at War Memorial and Old Rectory in Saxlingham Nethergate under WR-CUL-007 in Table 3.15. • Assessment of construction traffic and vibration on heritage assets, such as the medieval stained glass and other sensitive features of St Mary's Church under WR-CUL-012 in Table 3.15. • Transport Assessment and construction vehicles at Church Hill and The Krons under WR-TRA-028 in Table 3.17. • The Applicant notes an assessment of impacts by the AIL route through Saxlingham Nethergate

ID	Theme	Comments/Issues Raised	Applicant's Response
		listed buildings and heritage asset e.g. the War Memorial along the route. May I please understand what alternative AIL routes were considered and why is the proposed route preferred? My view is that the route through Saxlingham Nethergate has not been sufficiently and thoroughly assessed by the applicant; significant harms are threatened e.g. from vibrations. I believe that the 10 movements stated may cause substantial problems to heritage buildings such as thirteenth century stained glass. Alternatives and safeguards need to be properly examined and evidence given.	Conservation Area has been addressed in WR-CUL-005 and WR-CUL-006 in Table 3.15. As the cultural heritage assessments concluded there would be direct or indirect impacts to the conservation area or individual listed buildings, it is considered that restoration of the landscape is not needed. The Applicant can confirm that abnormal load specialists Wynns considered alternative routes including via Hempnall from the B1527 and via Fairstead Lane from A140. However, neither route was considered navigable based on the transformer specification and associated abnormal load vehicle configuration. The route through Saxlingham Nethergate is considered navigable and drawings are provided in Part 3 of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-176]** pages 58-60**.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed response on this issue in Q1.8.3 in The Applicant's **Responses to the Examining Authority's First Written Questions [REP1-083]**.

2.2 Brian Stephen Reynolds

Table 2.2 Applicant's Response to Brian Stephen Reynolds [REP1-361]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WSR-001	Transport and Access	The entrance drive to **[REDACTED]** courtyard is on the blind bend of **[REDACTED]** which is already dangerous. The section of the drive between the outbuilding and the road surface (1.4m) is essential for safe access and egress into the courtyard, for ourselves and the two neighbouring properties, by foot or vehicle. The mirror opposite (road furniture) is essential to see traffic coming from the right. Please see Photos 3 and 4. Any damage or reduction to this drive entrance would make the situation even more dangerous. The pavement opposite is the only safe place to walk. Under the verge and at the front of the drive of **[REDACTED]** and its **[REDACTED]** are BT services, water mains stopcock and sewage service point. A small Anglia Water leak near the stop cock (Photo 3) has taken 4 months for the work to be scheduled and will require the whole road to be closed for 3 days for the repair to be done correctly and safely. This indicates the type of disruption even	The Applicant notes this comment and refers to its response to WR-TRA-028 in Table 3.17 and WR-CUL-012 in Table 3.16 regarding impacts to Church Hill.

ID	Theme	Comments/Issues Raised	Applicant's Response
		a small amount of infrastructure damage can cause at this vulnerable place and makes us worried about the AIL risks to infrastructure.	

2.3 Caroline Ramsay

Table 2.3 Applicant's Response to Caroline Ramsay [REP1-296]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CR-001	Climate Change	5. The Applicant estimates construction emissions of 347,673 tCO2e, including 87,445 tCO2e for PV arrays and mounting structures [APP/6.1.6, Table 6.25]. The estimate is based on constituent material carbon factors. 6. A recent peer-reviewed lifecycle assessment reports cradle-to-gate emissions of 412 kgCO2e/kWp for bifacial PERC modules manufactured in China using the national-average electricity mix.[1] The Applicant assumes that the Scheme's panels will be sourced from China [APP/6.1.6, para 6.9.60]. On an illustrative 500 MWp, the study's factor would indicate approximately 206,000 tCO2e for module manufacture. By comparison, the Applicant's constituent-material calculation produces approximately 85,000 tCO2e for the panels when its stated glass inputs are applied arithmetically (see 7 below). The Applicant uses a product level manufacturing emissions factor for BESS. This raises a question as to whether the calculation approach captures the full manufacturing carbon footprint of the PV arrays.	The Applicant notes this comment and refers to its response to responses provided in Table 3.9 as outlined below: • Scepticism towards net zero under WR-CLI-002. • Beneficial impacts on total GHG emissions as a result of the Scheme under WR-CLI-005. • Full lifecycle of the Scheme under WR-CLI-006. • The impact of climate change on the operation of the Scheme under WR-CLI-008. • The Cradle-to-grave assessment under WR-CLI-009. The Applicant acknowledges the arithmetic error identified in Section 6.9.16 of in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** with regards to glass emission calculation and can confirm that the value reported in Section 6.9.16 should read 37,025 tCO_2e. It follows that Section 6.9.16 should read as follows:

ID	Theme	Comments/Issues Raised	Applicant's Response
			The total glass weight of all panels has been estimated as 26,393 tonnes. An embodied carbon value of 1.4028 kgCO2e/kg has been taken from the DESNZ 2025 (Ref 6-48) GHG conversion factors for glass. This gives a total of 37,025 tCO_2e for glass used across the Scheme. Confirmation of total mounting structures from waste consultant verifies that the mounting structure weight varies depending on panel type. The 800 kg refers to the weight for the 24x2 panel tables, whereas the 48x2 and 36x2 panel tables require an additional factor to be applied. Confirmed total mounting structure weight: 13,964,800 kg (13,965 tonnes) Mounting structure emissions calculation: Emission factor: 2.71 $kgCO_2e/kg$ (DESNZ 2025 (Ref 6-48) GHG conversion factors for steel. Total embodied emissions: 13,964,800 kg × 2.71 $kgCO_2e/kg$ = 37,845 tCO_2e. This matches the value reported in ES Volume 1 Chapter 6 Climate Change [APP/6.1.6].
WR-CR-002	Climate Chage	7. Two of the stated calculations also appear not to reconcile with their underlying inputs. Glass — paragraph 6.9.16	The Applicant notes this comment and refers to its response to WR-CR-001 above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Applicant's inputs: 26,393 tonnes × 1.4028 kgCO_2e/kg Calculated result: approximately 37,024 tCO_2e Reported result: 1,371 tCO_2e Mounting structures — paragraphs 6.9.18–6.9.19 Applicant's inputs: 9,973 structures × 800 kg × 2.71 kgCO_2e/kg Calculated result: approximately 21,621 tCO_2e Reported result: 37,845 tCO_2e Correcting both figures using the Applicant's stated inputs increases the combined PV-and-mounting estimate from 87,445 tCO_2e to approximately 106,870 tCO_2e. Correcting both figures using the Applicant's stated inputs increases the combined PV-and-mounting estimate from 87,445 tCO_2e to approximately 106,870 tCO_2e.	
WR-CR-003	Climate Change	8. Finally, I have not seen figures for the end-of-life emissions associated with PV panels and BESS equipment removed and replaced during the operational life of the Scheme, as distinct from equipment remaining in place until final decommissioning.	The Applicant notes this comment and refers to the following responses in Table 3.9 in Section 3 of this document: • The impact of climate change on the operation of the Scheme under WR-CLI-008. • The cradle-to-grave assessment under WR-CLI-009.

ID	Theme	Comments/Issues Raised	Applicant's Response
			With regards to end of life emissions associated with replacement PV panels during the operational phase of the Scheme the Applicant acknowledges that in Section 6.9.76 in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** PV panels will be fully replaced once during the lifecycle of the scheme, with the operational life of PV panels 40 years. An initial 2% degradation in the first year and 0.45% for every additional year for a PV Panel has been utilised as confirmed in Section 6.4.21. It is noted that an additional 3% ad hoc replacement degradation rate will be considered based on a 0.05% failure rate per year, as confirmed in Section 6.9.67. This assessment takes a conservative approach and assumes that the embodied carbon associated with PV Panel replacement will match that of the original construction phase. Given the uncertainty surrounding future developments in PV cell composition (e.g. monocrystalline, polycrystalline or thin-film), module conversion efficiency, polysilicon manufacturing processes, and panel degradation rates, it would not be appropriate to speculate on these parameters at each replacement stage throughout the Scheme. With regard to end of life emissions associated with battery replacement assumptions during the operational phase of the Scheme, the Applicant acknowledges in Section 6.9.75 in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			BESS lifespan is assumed at 10 years for the purpose of the assessment as a conservative assumption. While advancements in BESS technology and some of the assumptions used which underpin the embodied carbon values may have improved at the point of replacement, as a conservative approach, the assessment assumes that the embodied carbon at replacement will be the same as during the construction phase, inclusive of transportation emissions (sea and land) as described for the construction phase for each replacement. It is not appropriate to speculate on technological improvements to BESS chemistry, charging source, cycling regime and parasitic cooling demand at each replacement stage throughout the Scheme and subsequent associated parameters for the assessment.
WR-CR-004	Other Environmental Matters	12. The Applicant says the Scheme has considered resilience to extreme weather and that panels and infrastructure will withstand high winds in accordance with relevant standards and guidance [APP/5.11, p.189]. It also states that extreme-weather risks and resilience to climatic change over the 60-year life have been considered [APP/6.1.6, para 6.5.49], and recognises that projected climate changes and environmental extremes are likely to become	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • The impact of climate change and projections (including climate projections, future weather extremes and climate hazards) on the operation of the Scheme under WR-CLI-007 in Table 3.9. • Major accidents, disasters and extreme weather under WR-MAD-004 in Table 3.24.

ID	Theme	Comments/Issues Raised	Applicant's Response
		more severe during operation [para 6.9.149]. However, I have not identified the severe-weather conditions against which that resilience was assessed, in particular the wind or storm severity and expected return period the PV panels and their mounting structures are required to withstand, or how events exceeding that design basis have been considered.[4] For context, Kettle (2023) records that Storm Kyrill's wind speeds in Germany were assessed at the level of a 50-year return-period event; the storm caused widespread infrastructure damage and disruption across Europe.[5] 13. The CCRA assigns increased storm intensity a Very Low likelihood and Minor adverse consequence [APP/6.1.6, Table 6.37]. The Applicant states that consequence ratings use professional judgement and supporting evidence,[6] but I have not identified the supporting evidence for that rating or the nature, severity and probability of the storm event being assessed in relation to the PV panels and their mounting structures. Experience from insured weather losses also illustrates the uncertainty associated with estimating the frequency of severe events from historical experience. Swiss Re found that a French hail event-loss level previously associated with a 20–50-year market return period had been exceeded three times	

ID	Theme	Comments/Issues Raised	Applicant's Response
		within a decade, requiring reconsideration of industry return-period assumptions; using the additional data, it estimated the return period at less than ten years. Swiss Re also notes that climate change could influence the intensity and frequency of convective storms, although current trends remain highly uncertain.	
WR-CR-004	Climate Change	15. Chapter 6 also identifies 'deterioration of structures or foundations due to decrease in soil moisture levels' as a potential operational climate risk [APP/6.1.6, Table 6.37]. However, the measure identified in the assessment for lower summer rainfall concerns provision of stored water for fire suppression.	The Applicant acknowledges in Table 6.37 in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** Table 6.37, that stored water deployment constitutes a dual-function climate adaptation measure addressing compound climate hazards. Specifically, the measure operates as a coupled mitigation strategy wherein stored water reserves provide suppression capacity during extreme heat events coinciding with decreased summer precipitation and prolonged drought conditions, reducing wildfire ignition probability and propagation rates, while simultaneously functioning as soil moisture replenishment. This approach optimises adaptive capacity by leveraging a single infrastructure asset (water storage) to manage multiple climate-induced risks.
WR-CR-005	Ground Conditions	16. The Ground Conditions Assessment identifies potential land-instability and subsidence risks and records clay strata and former clay pits within or	The Applicant notes this comment and refers to its response under WR-GRO-005 in Table 3.21.

ID	Theme	Comments/Issues Raised	Applicant's Response
		adjoining parts of the selected site. [9] The wider South Norfolk area is also characterised by substantial clay geology. Chapter 4 provides for piled mounting structures up to 4 m deep [APP/6.1.4, Table 4.1], but I have not identified evidence demonstrating how the depth and design of those foundations address shrink-swell ground movement from prolonged dry periods. BGS identifies shrink swell ground movement as a significant geohazard and expects warmer, drier summers and increased rainfall variability to increase shrink-swell activity. This is particularly relevant to the suitability and resilience of the site selected for infrastructure intended to operate for 60 years.	
WR-CR-006	Climate Change	19. The Applicant estimates a lifetime operational carbon saving of approximately 1.3 MtCO2e, against its figure of approximately 0.35 MtCO2e of construction emissions incurred before operation [11] (subject to the calculation issues identified at paragraph 7 above). I have not identified a calculation showing when that initial carbon outlay is offset by operational carbon savings (the carbon payback period). 20. The claimed saving is sensitive to the counterfactual. Chapter 6 describes the comparator both as the 'forecast UK Grid Average' [para 6.4.31] and as 'long-run marginal grid emissions forecasts for 2031' [para 6.7.5].	The Applicant acknowledges the arithmetic error identified in **ES Volume 1, Chapter 6 – Climate Change [APP-042]** with regards to operational/lifecycle intensity and overall savings of the scheme. Clarifications and minor amendments to the calculations are as follows: • Lifetime system production value: 36.78 TWh. To confirm 36.33 TWh was a typographical error that was reported in the ES Chapter. 36.78 TWh is the correct value that was used in the calculations.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The basis of the comparator therefore requires clarification. The lifespan saving is calculated using the 2031 grid emissions factor, although, on the NESO pathways the Applicant cites, rapid subsequent decarbonisation follows, reaching zero or below by around 2035.[12] Applying a 2031 comparator across a 60-year life may therefore overstate the emissions that would otherwise occur and is too simplistic a basis for a claimed carbon benefit of such importance to the planning balance. 21. The comparison is also more complex than a single grid factor suggests. Average grid factors do not capture all whole-life emissions of the generation mix, and the emissions actually avoided by solar may depend on the marginal generation displaced. 22. These factors can operate in different directions, reinforcing the need for sensitivity testing. I have not identified analysis showing the effect on the claimed 1.3 MtCO2e saving of alternative grid-decarbonisation assumptions, marginal generation or later commencement. The material before the ExA therefore does not establish the robustness of the headline saving.	• Decommissioning emissions calculation error: emissions now total 6,432 tCO_2e rather than the 6930 tCO_2e reported. Total emissions: 1,459,023 tCO_2e • Total lifecycle intensity value: 39.67gCO_2e/kWh (remains unchanged despite discrepancies) • Operational intensity value: 30.04gCO_2e/kWh. The original value (29.74 gCO_2e/kWh) reported in the ES chapter was a typographical error. • Net savings (ES chapter methodology): 1,285,782 tCO_2e. Net savings are calculated by deducting total operational emissions from gross avoided emissions. Construction emissions are excluded from this calculation as the assessment benchmarks the scheme's total lifecycle emissions against the grid carbon intensity from the first year of operation (2031: 65 gCO_2e/kWh) rather than the grid carbon intensity at the first year of construction. This methodology ensures that the avoided emissions comparison reflects trajectory of the decarbonising grid for the operational phase only. It is important to note that these matters do not materially affect the conclusions of the greenhouse gas assessment.

ID	Theme	Comments/Issues Raised	Applicant's Response
			With regard to Matter 19, the Applicant acknowledges that **ES Volume 1, Chapter 6 - Climate Change [APP-042]** does not provide an arithmetic calculation outlining when the initial carbon outlay is offset by operational carbon savings (i.e. the carbon payback period). The Applicant states in Section 6.9.122 of **ES Volume 1, Chapter 6 - Climate Change [APP-042]** that the carbon intensity figure for the assessment has been calculated using total lifetime GHG emissions across the Construction, Operational, and Decommissioning Phases to determine the operational carbon emission savings of the Scheme. Section 6.9.136 contextualises the figure calculated by comparing it against carbon intensity values for other energy sources. With respect to Matters 20, 21 and 22 the Applicant's assessment adopts the projected grid carbon intensity for 2031, the assumed first year of operation of the Scheme, as a fixed and consistent benchmark. The use of this value is not intended to suggest that grid carbon intensity will remain unchanged over the operational lifetime of the Scheme. Rather, it provides a common reference point against which the lifecycle emissions associated with the Scheme can be considered, without making the assessment dependent upon a particular long-term projection of the future electricity generation mix. The Applicant acknowledges alternative proposed methodologies such as application of the DESNZ

ID	Theme	Comments/Issues Raised	Applicant's Response
			projected grid carbon intensity pathway on a year-by-year basis over the operational lifetime of the Scheme (60 years). The two approaches therefore address the comparison on different bases. A potential alternative methodological approach illustrates the outcome under the DESNZ projected grid decarbonisation pathway, whereas the Applicant's assessment provides a comparison against the projected grid at the point at which the Scheme becomes operational. The Applicant acknowledges the potential alternative methodological approached it has referenced but does not consider that it invalidates the approach adopted within the ES or alter the lifecycle GHG emissions associated with the Scheme through this methodological approach. The Applicant notes the comments regarding the sensitivity of lifecycle greenhouse gas results to assumptions concerning future grid decarbonisation. The Applicant's assessment applies a clearly defined and transparent comparator which has been consistently applied throughout the assessment. The Applicant therefore does not agree that the existence of alternative sensitivity scenarios undermines the validity of the assessment or its conclusions.
WR-CR-007	Climate Change	24. Chapter 6 states that climate projections and asset sensitivities were reviewed to identify	The Applicant notes the comments raised. The purpose of the climate resilience assessment

ID	Theme	Comments/Issues Raised	Applicant's Response
		appropriate resilience measures [APP/6.1.6, para 6.9.143]. However, I have not identified testing of severe-but-plausible scenarios to compare alternative sites, layouts or design choices, including their consequences for damage, recovery, lost generation and carbon benefit. Such analysis could inform the suitability of the selected site relative to alternatives, as well as the way the Scheme is designed and operated - for example, the choice between fixed and tracking panels - rather than serving only as a test of its overall carbon case.	presented within **ES Volume 1, Chapter 6 -Climate Change [APP-042]** is to assess the vulnerability of the proposed Scheme to future climate hazards and identify any adaptation measures required to ensure that climate risks are appropriately managed throughout the operational life of the Scheme. The assessment is not intended to undertake a comparative appraisal of alternative sites, layouts or technology options based on climate resilience performance.
WR-CR-008	Energy Generation	26. Financial resilience is relevant to prompt repair or reinstatement after a severe loss. Insurance can transfer some financial risk, but sufficient resources are also required for uninsured costs and recovery. I have not identified an assessment of the financial consequences of a severe operational loss, or evidence of the financial and insurance arrangements supporting recovery.	The **Funding Statement [APP-021]** sets out how the powers and works that the DCO authorises is proposed to be funded. It also estimates the cost of the project that estimate includes for *'construction costs, preparation costs, supervision costs, land acquisition costs (including compensation payable in respect of any compulsory acquisition), equipment purchase, installation, commissioning, and power export. The estimate also includes an allowance for inflation and project contingencies'* (paragraph 2.2.2).
WC-CR-009	Climate Change	Geographic concentration creates an additional resilience – and energy security risk 27. The Scheme would not operate in geographic isolation. The Applicant records High Grove and The Droves at 31 km and 41 km respectively from the Order Limits. Together, the three proposed	As set out in the **Statement of Need [APP-206]** the Scheme would contribute to meeting the UK future electricity demand by providing 500MW of clean power to the NETS and a significant quantity of low carbon generation annually. The Scheme would be a

ID	Theme	Comments/Issues Raised	Applicant's Response
		large-scale solar installations represent approximately 1.72 GW of generating capacity. 28. A severe regional weather event could affect more than one installation simultaneously due to their proximity. Research into European windstorms has examined 'extreme-tail dependence' – the tendency for extreme events to occur at more than one location. For pairs of locations less than 50 km apart, 69% of those studied showed results statistically consistent with such dependence, compared with only 3% for pairs 150–200 km apart. This supports considering the three nearby schemes as potentially exposed to a common severe regional wind event. Simultaneous impairment of a substantial concentration of generation is relevant to national energy-system resilience and security. 29. Concentration could also exacerbate recovery through simultaneous demand for replacement equipment, specialist contractors and network repair capacity. Swiss Re identifies geographic concentration, shared infrastructure and specialist suppliers as sources of correlated loss, and notes that supply-chain bottlenecks and extended replacement times can increase the cost of recovery. US Solar Fund plc states that it uses geographic diversification across its solar portfolio	critical enabler of the UK's decarbonisation and energy security aims. **ES Volume 1, Chapter 6 - Climate Change -[APP-042]** sets out that climate risks from the operation and maintenance phase of the Scheme may occur from increased frequency of severe weather events, and increased summer and winter temperatures. These may impact both the buildings and infrastructure of the Scheme, and the human health of workers, however all potential impacts on the Scheme were found to be not significant. It was agreed with the ExA through the EIA Scoping Process (see **ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]**) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. The scope of the assessment presented is therefore appropriately proportionate. As set out in the **Outline OEMP [REP1-060]**, all works will be undertaken in accordance with relevant Health and Safety legislation and guidance. Details of fire, police, emergency services, and hospitals will be publicised and included in the site induction.

ID	Theme	Comments/Issues Raised	Applicant's Response
		to reduce exposure to any one extreme-weather or environmental event. 30. I have not identified an Applicant assessment of either the risk of simultaneous impairment of generating capacity contributing to national energy security or the additional recovery risk concentration could create for the Scheme. Without a fully supported assessment of these risks and their mitigation, such a concentration of substantial generating capacity in this location is not adequately justified.	

2.4 Catherine Mary Cunningham-Elliot

Table 2.4 Applicant's Response to Catherine Mary Cunningham-Elliot [REP1- 264]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CMCE-001	Landscape and Visual	I live in Hempnall which, like the neighbouring villages of Brooke, Fritton, Long Stratton, Morningthorpe, Saxlingham Nethergate, Woodton, to name a few, appears will be surrounded by the proposed solar panels and related infrastructure building and construction work. Apart from living within the 'epicentre' of the scheme, my journey to work regularly takes me through to Diss, as well as to Framlingham and Harleston via Fritton. This means I may 'experience' much of the activity the proposed sites may generate across a number of sites	The Applicant notes this comment and refers to its response under WR-LAN-016 in Table 3.10.
WR-CMCE-002	Need for the Scheme	It must be questioned as to the actual need for the sites selected. There appears to be a reliance on a general national need for solar (despite a regional need already met through other prioritised schemes) but nothing as to why any of these sites are specifically needed. And, with the scale of the project, some 2700 acres, with some sites (Site 7) being significantly bigger than any of the others, the scheme risks the widescale industrialisation of open countryside and destroying the area's rural character. If considered alongside other solar projects, the Pylons Corridor etc, all being	The Applicant notes this comment and refers to its response under WR-NEE-007 in Table 3.4. The Applicant also refers to the following responses in Section 3 of this document: • Site selection assessment under WR-ALT-002 and WR-ALT-003 in Table 3.8. • Site 7 site selection assessment under WR-ALT-022.

ID	Theme	Comments/Issues Raised	Applicant's Response
		proposed at the same time, the cumulative impact of these multiple projects and related infrastructure places a particularly excessive burden on Norfolk and disproportionately on South Norfolk.	• The need for the Scheme under WR-NEE-001, WR-NEE-002, and WR-NEE-005.
WR-CMCE-003	Soils and Agricultural Land Ecology and Biodiversity	There is also the use of agricultural land generally. There does not appear to have been any robust assessment and exploration of possible alternatives such as rooftops, car parks, brownfield, or generally less sensitive landscapes. As mentioned above with regards the local character of Hempnall and the surrounding areas in South Norfolk, these are rural by nature, with unsurprisingly many many small narrow roads, hundreds of listed buildings, home to many groups of rare botany, barbastelle bats, White Clawed Crayfish, and other wildlife. Others will have submitted evidence to this effect far more eloquently than I.	The Applicant notes this comment and refers to its responses under WR-ALT-011, WR-LAN-015, and WR-TRA-028 in Table 3.8 of Section 3 of this document. In relation to rooftop installations, the Applicant confirms that it is support of rooftop solar. However, as set out in Section 6.3 of the **Statement of Need [APP-206]**, while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve the government's clean power and net zero objectives. Large-scale ground mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
WR-CMCE-004	Transport and Access	The project will, if allowed, cause considerable and prolonged disruption, irreparable damage, which any proposed planting, re-planting mitigations could take decades to address, if indeed they do. For example, some construction traffic appears to be routed to travel through The Street and The Krons in Hempnall - The Street is a small two-way street wide enough (just) for 2 cars. However, residents do park all along one side. It is	This submission is addressed at WR-TRA-028 in Table 3.17 and WR-LAN-004 in Table 3.10.

ID	Theme	Comments/Issues Raised	Applicant's Response
		already extremely difficult to pass through generally, and it begs the question how would any larger vehicles manage? Regular farm traffic struggles. The same can be said of The Krons apart from the fact that road is barely wide enough for two cars. I am of the opinion that widening roads is not the answer as this is yet more loss of yet more wildlife, hedgerows, which form a key aspect of the area landscape. Again, others will have submitted evidence to this effect far more eloquently than I.	
WR-CMCE-005	Landscape and Visual	Construction traffic coming through Hempnall and along Broaden Lane is a particular concern to me given my home is on Broaden Lane at the end of the village. Also, fyi, my home was not named correctly on the applicants' land maps, and this was pointed out. I also have concerns with regards the activity and installations at Site 7 to the eastern side of Broaden Lane. This backs onto land behind Bainards Rise and I have concerns with regards noise, both during construction/installation, but also beyond and of course, aside from the issues I have already raised generally re landscape, wildlife etc, I have very real concerns about safety and the visual impact.	The Applicant notes this comment and refers to its response under WR-LAN-022, WR-LAN-008, WR-ECO-004, WR-CUL-012 and WR-TRA-014 in Section 3 of this document. The Applicant confirms the Respondent's address has been taken from the registered title on HM Land Registry. The Applicant encourages the Respondent to contact the Applicant with the specific details that need updating if they believe this is recorded incorrectly.
WR-CMCE-006	Transport and Access	I noted that the construction period is approximately 24 months and also the volumes of the additional traffic expected in the	The Applicant notes this comment and refers to its response under WR-TRA-003 in Table 3.1.

ID	Theme	Comments/Issues Raised	Applicant's Response
		applicants Construction Traffic Management Plan at Table 4.1:	
WR-CMCE-007	Human Health	Generally, I read all these tomes with a deep, deep feeling of apprehension and extreme anxiety. Given the extent of the project and the location of Hempnall at its centre, it appears to me that every route in and out of the village and surrounding areas will be impacted and have significant amounts of prolonged construction activity, which is having a seriously detrimental impact on my own well-being and enjoyment of my home and the area in which I live. I personally have not felt particularly included with regards the process. Some of this is due to the sheer volume of documents to navigate and try to understand which I haven't been able to do through complete overwhelm. I'm grateful to those who have been able to pore their way through the great tomes and represent the needs of the villages and people. Also, I was not able to engage in any hearings because of work commitments and the nature of my work, meaning I couldn't take time off or sit undisturbed at a computer over the 3 days either. I have been able to watch them afterwards and read the transcripts, but I still felt somewhat excluded. I was also not at home for a week and was unable to access the recordings or transcripts adequately.	The Applicant notes the concerns regarding the Examination timetable and the resources available. The setting of the Examination timetable is a matter of Examining Authority. Further rounds of hearings, including an additional Open Floor Hearing, are scheduled to take place during the Examination period. The Applicant's Community Relations team remains available to assist members of the public via a series of free-to-use communication channels (phone, post and email) with the DCO documentation. The Applicant acknowledges concerns regarding the effect of the Proposed Development and Examination process on individual wellbeing, including stress, anxiety and uncertainty. Human health has been assessed in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** which considers human health in relation to transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects. Mental health and wellbeing has also been considered, as presented in the **Equality Impact Assessment [APP-214]**. The **Outline CEMP [REP1-058], Outline CTMP [REP1-068], Outline OEMP [REP1-060], Outline OTMP [APP-202], Outline LEMP [REP1-064], Outline PRoWPPMP [APP-203]** and **Outline**

ID	Theme	Comments/Issues Raised	Applicant's Response
			ESSC [REP1-070] outline measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].**
WR-CMCE-008	Socio-Economics	I do want to also emphasise the impact of the project on my wellbeing. The uncertainty of the project does nothing to help with anyone who wishes to sell their home. My home has been valued very recently, however, if I were to sell, I have been advised that it would struggle to sell because of the uncertainty surrounding the project. Should the proposals be approved, who knows what the value of my home would be then. As a stand-alone issue, knowing my home could be impacted is worry enough. Like many people, my home constitutes a sizeable investment of time, money and sacrifices to achieve a home in which we want to feel safe and secure. I'm sure that local businesses who may be affected will have similar concerns.	The Applicant refers to WR-SOC-001 in Table 3.19 regarding property values. This states that the Applicant's **Book of Reference [REP1-018]** includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any diminution in value due to physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. The Applicant acknowledges that uncertainty regarding the ability to sell a home, or its potential future value, may be a source of stress and anxiety for individual residents. The **Equality Impact Assessment [APP-214]** specifically considers concerns relating to housing and business values as a potential mental health and wellbeing pathway,

ID	Theme	Comments/Issues Raised	Applicant's Response
			alongside uncertainty, visual amenity, attachment to place and changes to neighbourhood character. While recognising that individual experiences may vary, the assessment considers effects at a population level and does not identify significant negative equality effects.
WR-CMCE-009	Noise and Vibration	There is also the continued concern I have about how we will be affected by noise, both from the activity around the panels, and the work to install and maintain them as well as their presence. It is a constant worry and source of extreme stress and anxiety which fills me with dread. The worry of the potential noise, intrusion, destruction of the landscape, from actual sites and the related infrastructure activity which I have mentioned, is overwhelming and encompassing. It feels as though there will be nothing left of the beautiful countryside in this part of South Norfolk, the very reason why people chose to live here and I fail to see that there is any benefit to the local communities that outweighs the extent of the harm that will be done if the proposals are approved.	The Applicant refers to its response regarding health impacts under WR-HUM-001 in Table 3.27. The Applicant refers to its response to WR-NOI-001 regarding construction noise and to WR-NOI-002 regarding operational noise in Table 3.22.

2.5 Catherine Scott

Table 2.5 Applicant's Response to Catherine Scott [REP1-304]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CS-001	The Scheme Cultural Heritage	I am, with my husband, the joint owner/occupier of **[REDACTED]** which is within a cluster of barns at Gowing Way which would be surrounded by the proposed Site 5 within the proposed scheme. I object to the proposed scheme. I have no objection to solar schemes generally, but this attractive rural area is entirely unsuitable for a major national solar scheme, with all of the associated infrastructure. The vast proposed substation in Site 5 couldn't be in a less appropriate place, within an historic landscape, just across from St Catherine's Church, Fritton, built in the 15th century.	The Applicant notes this comments and refers to its responses to Matthew David Scott in Table 2.18. The Applicant further refers to its response to MFPC-PDA-002 (in Table 3.2) in **The Applicant's Response to Procedural Deadline A and Additional Submissions [REP1-103]** regarding the siting of solar PV panels and the Project Substation in Site 5.
WR- CS-002	Ecology and Biodiversity	We own the wood to the south of our property, which is directly adjacent to the proposed solar PV site. Our property includes woodland, a small orchard and three ponds and is a haven for wildlife, with regular sightings of a variety of deer, foxes, bats and numerous birds including barn owls, kingfisher, heron, egrets, little owls and grey wagtails. These species thrive in	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-ECO-001 regarding wildlife impacts • WR-ECO-004 regarding birds and WR-ECO-005 regarding bats • WR-ECO-006 regarding newts • WR-ECO-007 regarding deer

ID	Theme	Comments/Issues Raised	Applicant's Response
		the existing rural landscape. There are many newts in our ponds. The deer roam across site 5 and into our wood, particularly through the southern boundary, adjacent to the proposed site. We use the footpaths across site 5 to walk and run and to visit the Church. The proposed scheme would industrialise and destroy the surrounding environment.	• WR-REC-001 regarding footpaths.
WR-CS-003	The Scheme	I emailed Dalcour Maclaren on 04/05/06 regarding a letter we'd had asking for a survey on our property and notified them of the need to survey the bats and newts. On 18/06/26 I received a text message from a on an unknown number asking to visit our property the next or the following day. This was not possible and I asked for a formal letter identifying who this person was and suggesting other dates and pointing out that we have 2.5 acres of woodland directly adjacent to site 5. Nothing further has been heard from him or Dalcour Maclaren and no surveys have been carried out by them.	The Applicant notes the comments raised by the respondent with regards to arranging access for surveys. Following identification of ponds within the Respondent's landholding, the Applicant's agent wrote to the Respondent on 20 April 2026 seeking survey access. The Respondent subsequently confirmed access could be provided and this was passed to the Applicant's ecologist to arrange access. Contact was made on 18th June 2026 to arrange access, however the proposed dates were not suitable and due to the great crested newt season ending on 30th June 2026 there was insufficient time within the survey programme to re-arrange access. The Applicant wants to make the respondent aware that where ponds have not been surveyed, a precautionary approach has been adopted with an assumed presence of great crested newts. The **Design Principles, Parameters and Commitments [REP1-078]** sets out minimum offset distances that will be applied to ponds. Results of the great crested newt survey (eDNA) can be found in **ES Volume 3,**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Appendix 8.3 - Great Crested Newt Survey Report [REP1-048]. The Applicant confirms that Bat Surveys have been undertaken in the surrounding area. Access was not required via the respondent's property and was obtained through neighbouring land. **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** provides the results of the bat activity surveys
WR-CS-004	Soils and Agricultural Land Landscape and Visual	The village of Fritton and the neighbouring village of Hempnall are ancient, historic parishes, both of which are mentioned in the Doomsday Book. The landscape throughout the scheme comprises productive arable land and in many parts is scenic, gently rolling countryside and has always been a desirable place to live and work. The scheme proposes to turn this gentle rural landscape into semi-industrial land which will never be returned to agriculture, causing a loss of food production and compounding a rising lack of food security in the UK.	The Applicant notes this comment and refers to its responses under WR-SOI-001 and WR-SOI-002 in Table 3.20 regarding the use of agricultural land and food security.
WR-CS-005	Landscape and Visual	Whilst I believe that solar power has its place, along with other renewables, our county of Norfolk is taking a disproportionate share of national infrastructure schemes, degrading our rural landscapes with no benefit to local residents and with questionable	With regard to effects to the landscape character (and the rural landscape) the Applicant acknowledges that the Scheme would introduce a change to the character of the host fields and in part the wider district landscape character areas and rural landscape during its construction and operational lifetime. These are assessed and effects presented within the **ES Volume 1, Chapter 7 –**

ID	Theme	Comments/Issues Raised	Applicant's Response
		contributions to net zero. This scheme in particular is entirely unsuitable for an area of attractive small South Norfolk villages and is causing enormous concern to local residents and more widespread concern about the effects of a multitude of major infrastructure projects on the county generally	**Landscape and Visual [APP-043]** and associated appendices. While the Scheme would introduce solar infrastructure into a predominantly agricultural landscape, the Sites would remain largely undeveloped in character, with the vast majority of land retained as open grassland and available for continued agricultural management, including grazing. The Schemes design approach and its evolution in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]** and landscape and visual effects have been minimised as far as practicable. In addition, the **Green Infrastructure Strategy [REP1-013]** has sought to balance the need for visual screening with the retention of the landscape's defining visual characteristic features. The proposed mitigation performs legitimate landscape, ecological and green infrastructure functions. It supports the restoration and reinforcement of hedgerows, strengthens habitat connections through the farmed landscape, creates native woodland and field-edge habitats, and responds to the objectives of the Greater Norwich Green Infrastructure Strategy and Norfolk Local Nature Recovery Strategy. In summary the Applicant's position on the planning balance is set out within the **Planning Statement [REP1-074]**, which concludes that the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible. The residual significant adverse effects are considered to be outweighed by the substantial benefits of

ID	Theme	Comments/Issues Raised	Applicant's Response
			the Scheme, including the contribution to Clean Power 2030, and localised benefits to biodiversity, green infrastructure strategy, and employment and training.
WR-CS-006	Transport and Access	The fact that the developer needs to make provision for additional highway visibility splays and to allow for the removal of roadside vegetation (which presumably includes trees) in order for abnormal loads to pass through its historic villages is because of the complete inappropriateness of the local rural and village landscape and small country roads for this scheme.	The Applicant notes this comment and refers to its response under WR-TRA-022 in Table 3.17.

2.6 Cathy Harvey

Table 2.6 Applicant's Response to Cathy Harvey [REP1-429]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CHA-001	Transport and Access	In October 2025 we were made aware by Targeted Consultation that East Pye's plans had changed and that it was now proposed that AIL vehicles carrying a transformer, and others carrying cable drums would be travelling from the 'Railway' roundabout in Poringland, down to Stoke Holy Cross, turning left and proceeding to and through Saxlingham Nethergate towards land parcels on site 7. This route seems to have been selected when it became clear that it was not viable to take wide vehicles through the narrow centre of Hempnall as was initially proposed. It impossible to stress enough the unsuitability of the replacement route, which again feels as if it has been selected from a desktop study only, and I would STRONGLY RECOMMEND that Inspectors find time to travel along the full length of it, particularly from Stoke Holy Cross southwards as this is the only way to experience the winding and up and	The Applicant notes this comment and refers to its response under WR-TRA-022 and WR-TRA-018 in Table 3.17.

ID	Theme	Comments/Issues Raised	Applicant's Response
		down nature of the route and the closeness of roadside ditches and trees and hedgerows, some on very steeply banked sides. Less obvious, but marked by occasional railing or kerbing, are a number of drainage culverts crossing under the road. We are told that the largest of the AIL vehicles will be 4.86m wide, 40-45m long and 4.8- 5.2m high with a minimum 30m swept path radius. The only way they would be able to navigate this route would be by the extensive and irreversible removal of native hedgerows, verges and possibly trees, disturbing habitats, risking damage to delicate interlinked field drainage systems and blocking a well-used road while this devastating work was being carried out. In addition, the route goes through several stretches of on-road parking, including Stoke Road in Poringland, Poringland Road in Upper Stoke and Long Lane in Stoke Holy Cross as well as along The Street in Saxlingham Nethergate. There are also a number of 'pinch points', not least on Norwich Road in Stoke Holy Cross just before reaching the church at the top of the hill, which narrows to the	

ID	Theme	Comments/Issues Raised	Applicant's Response
		extent that it is often necessary when heading to Norwich to drive onto the pavement to avoid large vehicles coming the other way. Any necessary widening will require the removal of hedging and trees owned by adjacent home owners. It is not obvious that the owners (or the Parish Council) have been consulted on this. Once in Saxlingham Nethergate the road forms a bridge over a stream close to the junctions with Cargate Lane and Shotesham Lane. It is not clear whether or not this has been surveyed for its ability to bear AIL vehicles.	
WR-CHA-002	Transport and Access	Church Hill, Saxlingham Nethergate East Pye Solar have identified a 'pinch point' at the centre of Saxlingham Nethergate and are relying on the Wynn swept path map which seeks to demonstrate that an AIL vehicle carrying a transformer a can safely navigate the bend where The Street and Church Hill meet and then safely proceed up the narrowing Church Hill without causing any disturbance or damage to the village War Memorial and its curtilage or the listed and historic buildings that line the route.	The Applicant notes this comment and refers to its response under WR-TRA-001 and WR-TRA-014 in Table 3.17. The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in **Part 3 of the Transport Assessment, Environmental Statement Volume 3 Appendix 11.1 [APP-176] pages 58-60.** The drawing includes commentary on areas of overrun and oversail and confirms the war memorial and surrounding green and the historic walls will not be impacted by the AIL movement. The Applicant has provided a detailed

ID	Theme	Comments/Issues Raised	Applicant's Response
		The stated width of an AIL vehicle loaded with a transformer is 4.86m. According to the Wynn swept path map the narrowest point in the road measures 4.11m, with a wall and hedge on one side and the gable end of a home right on the pavement on the other. It is not understood how these figures square up with overhang/oversail assessments. Norfolk County Council's Highways Dept have recently been out to do their own assessment and measurements and these will form part of their 6 October submission. The Applicant's suggested solution to the problem at the bend is the encroaching onto the War Memorial path along with the already narrow curtilages in front of a 16th/17th century barn and a 17th home both of which have negligible foundations. An original wall, belonging to The Old Rectory and retaining up to 8ft of land and large trees is also proposed to be put at risk. There is also a risk that the narrow pavement leading to the primary school and all facilities south of it (playing field, social club, allotments etc) will be compromised. There is no other safe way to walk up the hill and none of this is acceptable.	response on this issue in Q1.8.3 in The **Applicant's Responses to the Examining Authority's First Written Questions [REP1-083].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		In addition, there is real concern that the services running under the road will be damaged by the weight of the vehicle which is over three times the UK limit for payloads and understood to exert downward pressure of 4.06/m2. At the time of writing (early October) there are three mains water leaks in the village (two on Norwich Road and one on Church Hill) waiting to be attended to. Finally, from a safety point of view, vehicular exit from my home on Church Hill is via a shared courtyard which links the two buildings with narrow curtilages mentioned above. It is already very difficult to see far enough out to exit the courtyard safely (see attached two pictures taken from my car) and we have all had close encounters with fast moving and/or quiet vehicles coming down the hill (see attached picture). This will only get worse if the end of the courtyard exit is foreshortened to facilitate AIL movements.	
WR-CHA-03	Recreation and Public Rights of Way	Footpaths Saxlingham Nethergate and Green are well known for their many miles of public footpaths, including the popular Boudica Way. They are enjoyed by visitors, including walking groups, who can be	The Applicant notes this comment and refers to its response regarding recreational routes under WR-REC-001 in Table 3.16. The Applicant acknowledges the concerns raised regarding Public Rights of Way particularly SN-FP12. An **Outline PRoWPPMP [APP-203]** has also been prepared

ID	Theme	Comments/Issues Raised	Applicant's Response
		seen making use of the church and playing field car parks, and locals (and visiting friends and family) who are fortunate enough to be able to walk along miles of beautiful paths and fields from their front door. I have a dog and we have covered every inch of the varied footpaths, bridleways and restricted byways here, many of them hundreds of times, without ever needing to get into a car. On wet or hot days there are sheltered, or shaded and dappled, linear woodland walks, on snowy days there are fields to romp over and on sunny days there are paths with rolling countryside views that take your breath away. Along the way there are ramblers, joggers, riders and other dog walkers, and greetings, news and gossip exchanged; the paths are an important part of community life. This walking is done for the joy of it but is undoubtably good for my health and that of everyone else similarly out and about. I am heartbroken by the thought of what we may lose. Some walking is for more practical reasons – neighbouring Hempnall has a shop with post office, car repair garages, a doctor's surgery and a café open daily, none of which we have here, and the	to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted walking routes and permissive paths. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme. The Environmental Statement has considered effects on the visual amenity of routes. A range of view locations on the PRoW network are considered in **ES Volume 1 Chapter 7 [APP-043],** including VL5 and VL18 on SN-FP12. In addition, a PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the impacts on users of recreational resources comprising PRoW, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity on the routes directly affected by the Scheme. Furthermore, to aid the understanding of effects for recreational users who may interact with the Scheme on

ID	Theme	Comments/Issues Raised	Applicant's Response
		footpath route there is particularly lovely, with a long linear woodland walk and a cut through a working farm, with lambs in springtime. The 'medium term' closure of SN-FP12, in particular, will mean this whole route would no longer be viable for the duration of the closure which is a significant blow. The suggested diversion via Saxlingham Green (with open but managed footpaths around the proposed substation and panels) will take longer and only serve as an unwanted reminder of the destruction of the lovely countryside there. The attached map, based on East Pye's APP-085, shows the circular walks and the linear walk to Hempnall all regularly taken by me, many of which will be affected or curtailed by construction work or ruined by fencing, noise or industrial views during the operation stage.	multiple PRoW undertaking circular routes from settlements, a **Sequential PRoW Assessment [EN0110014/EXAM/9.36]** is submitted at Deadline 2 and includes SN-FP12 as part of a circular route.
WR-CHA-04	Design Principles, Parameters and Commitments	Deferred Design/Combined Effects In very general terms I was concerned, during the 'Scope of the Proposed Development' part of the Issue Specific Hearing, to realise that in many of the aspects of the scheme final design decisions have yet to be made.	The Applicant notes this comment and refers to its response to WR-SCH-005 in Table 3.5.

ID	Theme	Comments/Issues Raised	Applicant's Response
		For example, it seems that it has yet to be decided which land parcels will contain 3.5m fixed solar panels and which will contain 4.5m tracking panels. Given the difference in height, size, construction technique, orientation, flatness, movement and noise (and perhaps other factors) it seems to me that whichever is chosen will have different impacts in terms of water run-off, glint and glare (aircraft), bat disturbance (lake effect), construction noise (piling or not), construction time, construction traffic type (concrete or not), ongoing cleaning and maintenance, operational noise and so on, none of which can be considered and examined until the exact design in each individual parcel (which will have different gradients, and soil types) is known. This comment goes across all the individual components of the proposed infrastructure and until the fundamental detail of each element is disclosed it will limit anyone's ability to understand and consider the crucial combined effects (noise, visuals etc) of each area of the scheme.	

2.7 Charlotte Mary Harrison

Table 2.7 Applicant's Response to Charlotte Mary Harrison [REP1-338]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CMH-001	Transport and Access	Further to my Written Representation already submitted as a Church Hill resident directly impacted by the East Eye Solar scheme, I wish to especially draw your attention to Paragraph 6 of that document. The proposal to use and widen Church Hill for construction access would cause substantial and unjustified harm to designated heritage assets, as well as to residential amenity and safety. Further to the issues I have already raised, I wish to strongly request that the Planning Inspectorate visits Church Hill, Saxlingham Nethergate, and walks the proposed route for themselves. This is the only way that the catastrophic destruction of one of the most beautiful, historic, and unspoilt villages in Norfolk could hopefully be averted. Thankyou	The Applicant refers to Applicant's response to TRA-049 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** and at WR-TRA-028 in Table 3.17 in this document.

2.8 Clare Turner

Table 2.8 Applicant's Response to Clare Turner [REP1-209]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CT-001	Planning Process	Firstly, I have to mention this whole process is far too complicated and confusing for the general public... an obvious 'plot' to put people off having their say! I am an interested party both as an individual citizen and local land owner. My late husband farmed the land in Howe/Shotesham area and his family has done so for several generations. I submit these comments in both capacities. I strongly support all the challenges put forward by East Pye Solar (BEPS) group in its latest submission document entitled 'Consolidated Summary of BEPS's Written Representations chapters 1-20: Principle Evidence, Unresolved Constraints and Consequences for Development Consent'. I believe the document omits comment on the whole principle of 'Democracy' and the whole 'Political representative impact'. Norfolk County Council, the various affected district councils (South Norfolk County Council primarily) and the many town and parish councils are unanimous in their opposition to East Pye Solar proposed	The Applicant's response to BEPS' Consolidated Written Summary can be found in **The Applicant's Response to Block East Pye Solar's Deadline 1 Submissions [EN0110014/EXAM/9.35]**. The Applicant also refers to its response to WR-DCO-004 in Table 3.1 regarding the decision process for Nationally Significant Infrastructure Projects.

ID	Theme	Comments/Issues Raised	Applicant's Response
		scheme. To support this proposed scheme in the face of unanimous opposition would fiercely undermine local democracy. Furthermore, it would run counter to the central Government policy of devolving power and decision making to the local political levels. This proposed scheme will destroy and remove high yielding land (food production and conservation) and will end up in the hands of international corporates. How powerless we feel...local and farming communities destroyed and broken	

2.9 Colleen Hayter

Table 2.9 Applicant's Response to Colleen Hayter [REP1-274]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-CH-001	Landscape and Visual Ecology and Biodiversity	I am really concerned about the impact of the East Pye Solar Project. It is going to cause a lot of disruption to the area and will ruin the countryside and wildlife which is why I particularly moved here.	The Applicant notes this comment and refers to WR-LAN-001 in Table 3.10 and WR-ECO-001 in Table 3.12.
WR-CH-002	Socio-Economics	I am worried about the future and how this would affect property values and being able to sell in the future if this goes ahead.	The Applicant refers to its response regarding the effect of the Scheme on local property values under WR-SOC-001 in Table 3.19.
WR-CH-003	Soils and Agricultural Land	The loss of farmland is another huge concern especially as the project is such a large proportion of South Norfolk and already there are other projects resulting in loss.	The Applicant notes this comment and refers to its response on the use of agricultural land under WR-SOI-001 in Table 3.20.
WR-CH-004	Transport and Access	It will affect local journeys to work and school as well. It will be a terrible outcome if this project goes ahead.	The Applicant notes this comment and refers to its response on construction traffic impacts under WR-TRA-009 in Table 3.17.

2.10 David and Anne Lloyd

Table 2.10 Applicant's Response to David and Anne Lloyd [REP1-417]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-DAJ-001	Soils and Agricultural Land	1) The use of 2700 acres of mainly grade 2 Agricultural land, especially in time of global uncertainty.	The Applicant notes this comment and refers to its response to WR-SOI-001 and WR-SOI-002 in Table 3.20.
WR-DAJ-002	Transport and Access	2) The infrastructure and disruption to our small villages who are already under pressure from the growing amount of traffic.	The Applicant notes this comment and refers to its response to WR-TRA-001 in Table 3.17.
WR-DAJ-003	Compulsory Acquisition	3) The compulsory purchase of property, in particular buildings have stood for hundreds of years and have architectural importance. We were assured by the representative of East Pye Solar that the compulsory purchase of our home was a mistake on their part, is this yet another mistake? To find that our 500 year old property was to be compulsorily purchased by finding a notice attached to a piece of wood nearly 2 miles up a little used track was inconsiderate and unprofessional at the very least!	The Applicant confirms that there is no intention to compulsorily purchase any homes or gardens for the Scheme. The Applicant believes there may be some confusion in the notice the respondent is referring to. The Applicant is unable to confirm the land ownership for the respondent and encourages them to contact the Applicant through the communication channels including an email address, freephone number and freepost address to confirm this point.

2.11 Deborah Adams

Table 2.11 Applicant's Response to Deborah Adams [REP1-486]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-DA-001	Transport and Access	I would like to challenge the effectiveness of the position of the East Pye site within our small rural villages location. The site is quite a distance from main A roads and presents many challenges listed below, it would suit better near main roads where access to sites would be instantly accessed, easier and less costly.	The Applicant notes this comment and refers to its response to WR-TRA-001 in Table 3.17.
WR-DA-002	Landscape and Visual	The visual impact would not effect residents properties of small village locations if it was situated away from residential areas	The Applicant notes this comment and refers to its response to WR-LAN-001 in Table 3.10.
WR-DA-003	Funding	The cost of the project would be less making access easily available for equipment and materials to reach construction sites. I have now read the project will run into billions of pounds. Cost could be minimised if access was directly from a main A road onto a site	The Applicant notes this comment and refers to its response to WR-APL-005 at Table 3.3.
WR-DA-004	Transport and Access Noise and Vibration Human Health	Considerable disruption for local people, during construction as the project would surround the village of Hempnall, small village roads would in effect be blocked or closed making access to homes and travel impossible or very difficult. Noise of	The Applicant notes this comment and refers to its response to WR-TRA-001 in Table 3.17.

ID	Theme	Comments/Issues Raised	Applicant's Response
		construction due to close proximity to residents homes would be severe and disruptive to normal everyday life Increase in volume of traffic onto already busy village lanes and roads. All of this will have a severe impact on residents health and well-being.	With respect to Noise and Vibration, the Applicant notes this comment and refers its response to WR-NOI-001, in Table 3.22.
WR-DA-005	Transport and Access	Local bus travel, many residents rely on buses to travel and get to work on time, disruption on the roads/traffic could hinder this	The Applicant notes this comment and refers to its response to WR-TRA-023 in Table 3.17.
WR-DA-006	Transport and Access	Extreme damage to hedgerows and vegetation, small village roads to be widened, one area in particular being a conservation area, this could be minimised if the site moved elsewhere nearer to main roads. Damage to hedgerows, trees etc will have a devastating impact on wildlife and biodiversity. This could be minimised if the site was moved elsewhere nearer to main roads.	The Applicant notes this comment and refers to its response to WR-CON-020 in Table 3.2.
WR-DA-007	Compulsory Acquisition	compulsory purchasing of land to widen roads for access and damage to historical buildings, this cost could be avoided if the	The Applicant notes this comment and refers to its response to WR-CON-017 in Table 3.2.

ID	Theme	Comments/Issues Raised	Applicant's Response
		site was moved elsewhere away from residential areas	As is standard in NSIP solar schemes, the **Draft DCO [REP1-014]** includes provision for compulsory acquisition of land and rights. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme. See the explanation in the **Statement of Reasons [APP-020]**. With regards to the impact on historical buildings the Applicant refers to the response provided under WR-CUL-009 in Table 3.15
WR-DA-008	Human health	extreme distress effecting residents physical and mental health, could be avoided if the site was moved away from residential areas.	The Applicant notes this comment and refers to its response to WR-HUM-001 in Table 3.27 and WR-CON-015 in Table 3.2. The Applicant notes the view that these effects could be avoided by locating the Scheme further from residential areas. However, the Human Health Summary Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]** do not conclude that relocation is required on human health or wellbeing grounds. Taking account of the Scheme design, embedded mitigation and the findings of the relevant technical assessments, the Human Health Summary Statement and Equality Impact Assessment concludes that the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. This population-level conclusion does not seek to discount or diminish the concern or distress reported by individual residents. **The Mental Health and Wellbeing Addendum [REP1-107]** provides further consideration of evidence and

ID	Theme	Comments/Issues Raised	Applicant's Response
			representations submitted during the Examination, including pathways relating to uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. Having considered this additional evidence, the Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment and does not alter the overall conclusion that a likely significant population-level health effect has not been identified.

2.12 Durrants on behalf of David and Elaine Wilson, John Ellis, Jonathan Cole, Pamela Wright, Ralph Penn, and the Thacker Family

2.2.1 The Applicant has responded to all submissions provided by Durrants on behalf of their clients in **Table 2.12,** noting that these submissions are replications and cover the same comments.

Table 2.12 Applicant's Response to Durrants on behalf of AJ Alexander & Sons [REP1-218], C G Moore & Sons [REP1-219], David and Elaine Wilson [REP1-220], John Ellis [REP1-221], Jonathan Cole [REP1-222], Pamela Wright [REP1-223], Ralph Penn [REP1-224] and the Thacker Family [REP1-225]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-DUR-001	Landowner Engagement	We continue to engage with the applicant as they try to negotiate the acquisition of the various rights that they wish to acquire. Should the Inspectorate be interested in an update as to progress to date we would be happy to provide one.	The Applicant remains committed to meaningful engagement with all land interests and wishes to continue discussions regarding Heads of Terms with the respondents and their appointed agent. The Applicant's engagement with affected landowners and negotiations in respect of land rights are recorded in the **Land and Rights Negotiations Tracker [REP1-020]**, which demonstrates the ongoing engagement undertaken throughout the pre-application process.
WR-DUR-002	Landowner Engagement	Unjustified Land Take 1. Introduction This representation is submitted on behalf of our clients in relation to the proposed compulsory acquisition of rights through their land for the East Pye Solar Scheme cable route. The Applicant has failed to demonstrate that the extent of land sought is necessary, proportionate,	The Applicant refers to its response provided under CON-046 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. The Applicant is confident that the legal tests under section 122 of the Planning Act have been met and considers the rights sought are proportionate and necessary. The Applicant's justification is set out in full in the **Statement of Reasons [APP-020]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		or compliant with the statutory tests under the Planning Act 2008. The land take is therefore unjustified and should not be authorised.	The Statement of Reasons demonstrates that the inclusion of powers of compulsory acquisition in the Order for the purposes of the Scheme meets the requirements of Section 122 as well as the considerations in the CA Guidance.
WR-DUR-003	Landowner Engagement	2. Legal Framework Under the Planning Act 2008, compulsory acquisition may only be authorised where: The land is required for the development - The layout of the scheme un-necessarily covers a huge geographical area linking disparate blocks of solar panels via our clients land to the proposed substation. The scheme has been designed to connect landowners who have signed up to include their land within the scheme rather than looking to acquire land closer to the proposed grid connection to reduce the length of the cable route. It seems entirely logical that the location of the panels should be based on the proximity to the substation and therefore the un-necessary cable requirement would fall away. There is a compelling case in the public interest – this is debatable in respect of the East Pye Scheme given the number of other schemes in the planning process.	The Applicant notes this comment and refers to its response regarding land rights under CON-038 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. As set out in the response above, the Applicant is confident that the legal tests under section 122 of the Planning Act have been met and considers the rights sought are proportionate and necessary. The Applicant's justification is set out in full in the **Statement of Reasons [APP-020]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The public benefit outweighs the private loss. The Applicant bears the burden of proof. In this case, the evidence presented falls materially short of the statutory threshold.	
WR-DUR-004	Landowner Engagement	3. Failure to Demonstrate Necessity The Applicant has not provided adequate justification that the specific land in question is required for the construction, operation, or maintenance of the proposed cable route. In particular: No engineering evidence has been supplied to demonstrate that the alignment cannot be reasonably adjusted to avoid the landowner's holding. No explanation has been provided as to why alternative corridors—identified in earlier scoping material—were discounted. The Applicant has not demonstrated that the width of the permanent easement or temporary construction corridor is the minimum necessary. The maximum widths have been quoted within Heads of Terms but these are excessive.	The Applicant refers to its responses provided under CON-043 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** and its response provided under ALT-007 in Table 3.8 regarding the appraisal of alternative cable routes. Regarding the width of the cable corridor, the construction of the cable route has been assessed throughout the **ES [APP-036 to APP-195]** with the minimum and maximum parameters set out in the **Design Principles, Parameters and Commitments [REP1-078]**. This includes parameters for depths and width of cable cables and working corridor width. The detailed design and construction of the cable route will be undertaken within the parameters authorised by the DCO and the corridor width will be able to be further defined.

ID	Theme	Comments/Issues Raised	Applicant's Response
		In the absence of such evidence, the statutory requirement of necessity is not met.	
WR-DUR-005	Landowner Engagement	4. Inadequate Assessment of Reasonable Alternatives National Policy Statements EN 1 and EN 3 require applicants to undertake a proportionate but robust assessment of reasonable alternatives. The Applicant has not: Provided a comparative appraisal of alternative cable routes; Demonstrated consideration of existing utility corridors, road verges, or less sensitive land; Assessed trenchless construction methods (e.g., HDD) that could materially reduce surface impacts and avoid the need for permanent land take. The absence of a transparent alternatives assessment renders the proposed land take unjustified.	The Applicant refers to its response provided under ALT-007 in Table 3.8 regarding the appraisal of alternative cable routes, existing utility corridors, road verges and less sensitive land. The Applicant refers to its response provided under WR-C&D-009 in Table 3.7 regarding the alternative use of trenchless construction methods on the Cable Route Corridor.
WR-DUR-006	Landowner Engagement	5. Disproportionate Impact on the Landholding The proposed route imposes a significant and avoidable burden on the landowner's	The Applicant notes the concerns raised in respect of impact to the landowners' agricultural operations. The Applicant refers to its response provided under CON-039 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		agricultural operations. The cable corridor would: Impose third party rights over the holding; Restrict access for machinery; Impose long term constraints on cropping, drainage, and land management; Reduce the economic viability of the farm. Where a route disproportionately impacts a single landholding, the Applicant must provide compelling justification. None has been provided.	The Applicant considers that a compelling justification has been provided with regards to the land and the need for the Scheme, details of which can be found in the Applicant's response at ID BEPS-056 in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-DUR-007	Landowner Engagement	6. Unproven and Excessive Easement Width The Applicant seeks a permanent easement and a wide temporary construction corridor but has not supplied: Engineering drawings; for example where cable junction boxes will be sited, size frequency etc Safety calculations; depth of cable Reinstatement protocols; soil and water management plans are lacking	The Applicant refers to its response under CON-043 regarding environmental considerations and refinement of the Cable Route Corridor, presented in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. The application for development consent has provided the maximum parameters for the Scheme, so that the final Scheme can be provided within the scope of these parameters at the detailed design stage. Information on cable depth, joint bays and link boxes available at this stage can be found in **Design Principles, Parameters and Commitments [REP1-078]**. Further information can be found in CON-044 of **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Justification for permanent restrictions on cultivation, drainage, or structures. Without this evidence, the extent of land required cannot be verified as necessary or proportionate.	CON-045 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** Mitigation for activities during the construction phase, including mitigation for the water environment and soil, are described in the **Outline CEMP [REP1-058]**. The **Outline SRMP [APP-204]** provides further information on how soils will be managed. The Applicant considers that it has given sufficient information to demonstrate that the land is necessary and proportionate for the Scheme.
WR-DUR-008	Landowner Engagement	7. Permanent Sterilisation Not Justified The proposed easement would impose permanent restrictions on the landowner's ability to: Undertake deep cultivation; Install or repair drainage; Erect buildings or structures; Plant trees or undertake environmental enhancement. The Applicant has not demonstrated why such restrictions are required for the lifetime of the project, nor whether modern cable protection systems could mitigate or eliminate these constraints.	The Applicant refers to its response provided under CON-044 and CON-045 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** regarding the construction of the Cable Route Corridor.
WR-DUR-009	Landowner Engagement	8. Failure to Satisfy Compulsory Acquisition Tests	The Applicant refers to its responses to WR-DUR-001 to WR-DUR-008 above. The Applicant is confident

ID	Theme	Comments/Issues Raised	Applicant's Response
		Given the deficiencies identified above, the Applicant has not satisfied the statutory tests. Specifically: The land is not proven to be required. The Applicant has not demonstrated a compelling case in the public interest. Reasonable alternatives have not been assessed. The public benefit does not outweigh the private loss, particularly where the harm is avoidable. Accordingly, the compulsory acquisition powers sought should be refused.	that the legal tests under section 122 of the Planning Act have been met and considers the rights sought are proportionate and necessary. The Applicant's justification is set out in full in the **Statement of Reasons [APP-020]**.
WR-DUR-010	Landowner Engagement	9. Inadequate Engagement with the Landowner The Applicant has not engaged in meaningful consultation with the landowner. Requests for route adjustments, technical justification, and mitigation have not been addressed. This falls short of the standards expected under the Planning Act 2008 and undermines the credibility of the Applicant's case. The Applicant has been aggressive in their approach to negotiations to acquire the necessary	The Applicant refutes the allegation of aggressive behaviour with the affected landowners and their appointed agent. The Applicant considers that the Statutory Consultation was undertaken in accordance with the requirements of the Planning Act 2008, the EIA Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. This includes publicising the consultation in accordance with Section 47 and Section 48 of the Planning Act 2008. The acceptance of the Applicant's application for Examination by the Planning Inspectorate serves as

ID	Theme	Comments/Issues Raised	Applicant's Response
		right on a voluntary basis. There has been no meaningful attempt at negotiations. The meetings that have been held have been un-constructive and the Applicant`s position has been that we will obtain consent for our scheme and the statutory framework for compensation will prevail and there is no reason for us to exceed the statutory basis. This is not a negotiating position this is a closed position which is difficult for a landowner to comprehend.	confirmation that the Applicant has fulfilled its statutory pre-application duties. The latest status of negotiations is set out in the **Land and Rights Negotiations Tracker [REP1-020].** The Applicant has maintained regular engagement with the Respondent's and their appointed agent since issuing draft Heads of Terms in September 2025. The latest meeting with the appointed agent was held on 21 October 2026 to review outstanding points on the Heads of Terms. The Applicant has explained the landowners that should development consent be obtained for the Scheme, compulsory acquisition powers will be available. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. It is important that landowners fully understand the context in which voluntary negotiations are taking place. The Applicant also refers to its response provided under CON-041 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** regarding engagement with landowners.
WR-DUR-011	Landowner Engagement	A voluntary agreement offers the landowner materially greater control over the extent of land taken, the terms of access, the construction methodology,	The Applicant is committed to negotiating with landholders affected by the Scheme to secure land by voluntary agreement, as set out in the **Land and Rights Negotiations Tracker [REP1-020]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and the level of compensation. It enables the negotiation of protective provisions and bespoke reinstatement obligations that are not available under compulsory acquisition. It also avoids the uncertainty, delay, and adversarial nature of the compulsory acquisition process. For these reasons, entering into a voluntary agreement may be preferable where the landowner can secure terms that adequately protect their interests and mitigate the impacts of the proposed scheme, this has not been possible in respect of the East Pye Scheme.	Negotiations will continue with landowners and persons with interests in land affected by the Scheme. Nonetheless, it is necessary for the Applicant to seek compulsory acquisition powers to secure such land, rights and interests and to ensure that any third-party interests or encumbrances affecting such land, rights and interests may be acquired, overridden or extinguished pursuant to the **Draft DCO [REP1-014]**, thereby ensuring that the Scheme can be constructed, operated and maintained. The Applicant refers to its response to CON-042 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** regarding voluntary agreements and engagement with landowners.
WR-DUR-012	Landowner Engagement	Conclusion For the reasons set out above, the Applicant has failed to demonstrate that the proposed land take is necessary, proportionate, or justified. The compulsory acquisition powers sought in respect of the landowner's holding should therefore be refused.	The Applicant notes this comment and refers to all responses provided above. The Applicant is confident that the legal tests under section 122 of the Planning Act have been met, it has complied with the CA guidance and considers the rights sought are proportionate and necessary. The Applicant's justification is set out in full in the **Statement of Reasons [APP-020]**.

2.13 Heather Smith

Table 2.13 Applicant's Response to Heather Smith [REP1-285]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HS-001	Landscape and Visual Ecology and Biodiversity	I am 100% against this project. Destroying the landscape, the communities and the life of the people and buildings and wildlife in this area is not something you can fix later. One of the reasons I moved to Norfolk was the lifestyle, the culture, the beauty of the place. You would be destroying that. I love the area I live in - wildlife comes into my garden. I love the peace and quiet and the dark skies at night. I love the small country lanes. I can go running on the footpaths and bridleways and see the beauty of the landscape, the farm animals and crops and wildlife, in particular, owls, deer, hare, squirrels, dragonflies, the bats at dusk. There are so many public rights of way that would be impacted by this project. I've run on all of them. It may sound overly romanticised but that is how it is	The Applicant notes these comments and refers to the following responses provided in Section 3 of this document: • WR-LAN-001 in Table 3.10 regarding landscape impact. • WR-LAN-033 in Table 3.10 regarding impacts to footpaths. • WR-ECO-001 in Table 3.12 regarding wildlife impact.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HS-002	Site Selection and Alternatives Funding	I have seen current solar panel sites - the devastation at Swainsthorpe/Mulbarton and in Essex. They are awful. Why are they not using sites already built on - money? You can't quantify in money what we will lose if this goes ahead. The sleepless nights that people have already, and will continue to, experience. The loss of value of our properties. What gives our village communities their character will be destroyed by this project. The noise and disruption to our way of life - even by making the roads wider. Please think again. There are too many reasons why this is not the right area for a project of this nature.	The Applicant notes these comments and refers to the following responses provided in Section 3 of this document: • WR-SOI-001 in Table 3.20 regarding rooftop solar and other alternative sitings for the Scheme. • WR-APL-004 and WR-APL-005 in Table 3.3 regarding funding. • WR-SOC-001 in Table 3.19 regarding property values. • WR-NOI-001 in Table 3.22 regarding noise and vibration.
WR-HS-003	Community Impact	I live in Hempnall, I work at home. I am a home-owner. I am a trail runner. I have a pet who enjoys the outdoors. I have a garden where I grow my own fruits and vegetables. I love nature. What part of my life will this not affect in a devastating way?	The Applicant acknowledges the point raised with regards to the respondent's property. The Applicant notes that the respondent is identified as a category 3 interest in the **Book of Reference [APP-022].** However, no part of the respondent's property is located within the Order limits for the project.

2.14 Helen Pye

Table 2.14 Applicant's Response to Helen Pye [REP1-363]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HP-001	Noise and Vibration	(Netherhall Cottage The Street Saxlingham Nethergate NR151AJ) What of the effect of the potential vibrations caused by the very large vehicles manoeuvring around the corner in front of my overground sewer situated beside my steps, close to my listed windows on my Clay lump, wattle and daub, rubble infill home and other similar buildings beside me.	The Applicant notes these comments and refers to its response to Ms Pye under comment HP-001 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.
WR-HP-002	Transport and Access	Manoeuvring backwards and forwards to get around this dangerous corner I believe is a danger to my home. What legal reassurance do we have that any damage will be fully and immediately repaired by the applicant? Are they able to cope with a major structural issue to my house?	The Applicant notes this comment and refers to its response to Ms Pye under comment HP-001 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.
WR-HP-003	Transport and Access Arboriculture Cultural Heritage	To get around the corner it has been threatened: To remove the period/ historic street furniture, ancient hedges, demolish an 18th century listed 2* wall, to overrun within a couple of feet of listed buildings like mine	The Applicant notes this comment and refers to WR-CUL-007 in Table 3.15.

ID	Theme	Comments/Issues Raised	Applicant's Response
		with no foundations AND to overrun the listed war memorial Green.	
WR-HP-004	Water Environment	There is a known flooding issue in Saxlingham, which we all physically work to mitigate by digging out ditches and the Council have just invested in 3 leaky dams. The war memorial dip outside my house can completely fill in 3/4 of an hour of heavy rain flooding houses further down the street. Should any one of these collapse flooding would be inevitable at the next heavy rain. Already when the old Wash Lane ford is up, the current is such I cannot walk through it and is can be too deep to safely drive a car through.	The Applicant notes this comment and refers to its response to Ms Pye under comment HP-004 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.
WR-HP-005	The Applicant	We are genuinely frightened of the very heavy vehicles damaging the drains we have beside and under the Street thus increasing our flooding risk we would be cut off, as we have been before. What legal reassurance do we have that the applicant can cover the cost of the village flooding?	The Applicant can confirm that the route through Saxlingham Nethergate will not be used for general construction vehicles. It has been assessed as a viable route for abnormal load vehicles. The Applicant can confirm that abnormal load specialists Wynns have undertaken vehicle swept path work based on the transformer specification and associated abnormal load vehicle configuration for route through Saxlingham Nethergate. The drawings are provided in Part 3 of the **ES Volume 3, Appendix 11.1 - Transport Assessment, [APP-176]** pages 58-60. The Applicant has provided a detailed response on this issue in Q1.8.3 in **The Applicant's Responses to the Examining Authority's First Written**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Questions [REP1-083]. The management of construction traffic and flood risk is addressed through the measures secured for the Scheme, including those set out within the **Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, the **Design Principles, Parameters and Commitments [REP1-078]**, secured through Requirement 5 of the **Draft DCO [REP-014]**, and the **Outline Construction Traffic Management Plan (CTMP) [REP1-068]**, with the detailed CTMP secured through Requirement 15 of the **Draft DCO [REP1-014]**.
WR-HP-006	Cultural Heritage	**St Mary the Virgin Parish Church, Church Hill, Saxlingham Nethergate Parochial Church Council (including the specialist conservator's objection report)** As a PCC we have the duty to ensure the heritage of the church. • The church is on the proposed AIL route up Church Hill Saxlingham Nethergate. • We submit that it is entirely wrong to risk the movements of the AIL lorries with their vibrations causing irreparable damage to glass of date no later than 1250 and other nationally significant glass. • The ancient glass is irreplaceable	The Applicant refers to responses provided in WR-CUL-009 in Table 3.15 on the assessment of Churches and CUL-035 AIL movements in relation to Saxlingham Nethergate. Furthermore, the Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• The PCC commissioned Devlin Plummer Stained Glass ltd to restore this ancient glass using the latest technology. He is a member of the Institute of Conservation.	
WR-HP-007	Noise and Vibration	**Appendix B – Report on the potential risks to the nationally significant stained glass** 6. Concern Regarding Repeated HGV Movements Our concern is not that a single HGV passing the church can automatically be assumed to cause damage to medieval glass. Such a claim would require appropriate measurement and technical evidence. The more important issue is the effect of repeated heavy vehicle movements over an extended construction period. Potential vibration will depend upon several variables, including: • vehicle weight; • axle loading; • vehicle speed; • frequency and number of vehicle movements; • road construction; • potholes, covers and other surface irregularities;	The Applicant refers to WR-NOI-008 in Table 3.22. The Applicant refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• ground conditions; • distance between the highway and church; • foundation construction; • condition of the historic masonry; and • condition and support arrangements of the individual stained glass windows.	
WR-HP-008	Noise and Vibration	Consequently, absence of visible damage following an individual vehicle movement cannot demonstrate that repeated movements over months or years are without conservation risk. Cumulative exposure should therefore be considered. 7. Particular Sensitivity of the Saxlingham Glass The potential consequences at Saxlingham Nethergate warrant particular consideration because the glazing includes exceptionally early material. Some of the glass has survived for approximately three-quarters of a millennium. During that period individual panes have inevitably acquired varying degrees of surface deterioration, historic fractures, repairs and changes to their supporting leadwork. Such characteristics form part of the archaeological history of the windows but	The Applicant refers to its response in WR-NOI-008 in Table 3.22. The Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		may also make individual more vulnerable than new glazing. The appropriate test should therefore not simply be whether vibration is capable of causing immediate structural failure of a church building. Assessment should consider whether vibration or cyclic movement could adversely affect the most vulnerable significant component within that building, which in this case may be individual pieces of medieval painted glass or their historic glazing system.	
WR-HP-009	Noise and Vibration	Historic England recognises vibration as a potential hazard to historic fabric. Historic England's published guidance concerning historic features during building works specifically identifies vibration amongst the mechanisms capable of causing damage. Historic England has also recognised, in its guidance concerning development and transport impacts, that intensification of traffic can affect the historic environment. Of particular relevance, Historic England's published guidance concerning the impacts of mineral extraction specifically acknowledges that noise, dust and vibration caused by the regular passage of HGVs have the potential to damage the fabric of historic buildings and monuments.	The Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HP-010	Traffic and Access	10. Recommended Requirement: Avoidance We recommend that significant construction HGV traffic associated with East Pye should, wherever reasonably practicable, be routed away from St Mary the Virgin. If an alternative route is reasonably available, avoidance provides a substantially more robust conservation solution than attempting to manage vibration after heavy vehicle movements have commenced. The final Construction Traffic Management Plan should therefore identify the church as a specific sensitive heritage receptor and demonstrate how construction routing has sought to avoid it. 11. Where HGV Movements Cannot Be Avoided If significant HGV movements close to the church cannot be avoided, we recommend that the following measures are secured before commencement of the relevant construction phase.	The Applicant refers to its response in WR-CUL-003 in Table 3.15 regarding impact to historical churches. Furthermore, the Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.
WR-HP-011	EIA Methodology	**A. Specialist Baseline Condition Survey** A comprehensive condition survey should be undertaken of the medieval glazing by an appropriately experienced stained glass conservator. This should include high-resolution photographic recording and identification of: • existing fractures;	The Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• edge-bonded repairs; • historic repair leads; • unstable solder joints; • fractured or fatigued leads; • bowed panels; • loose ties; • condition of saddle bars and ferramenta; • perimeter movement; • condition of glazing mortar; • vulnerable painted decoration; • surface corrosion and weathering; and • condition and fixing of environmental protective/isothermal glazing. The purpose should be to establish an objective pre-construction baseline.	
WR-HP-012	Cultural Heritage Noise and Vibration	**B. Structural Condition Survey** A conservation-accredited structural engineer experienced in historic masonry buildings should inspect the church and identify existing structural movement or vulnerabilities capable of transmitting vibration to the glazing.	The Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		C. Baseline Vibration Monitoring Vibration monitoring should be undertaken before commencement of construction traffic to establish the existing environmental baseline. **D. Predictive Vibration Assessment** The likely vibration generated by the proposed HGV movements should be assessed taking account of: • proposed vehicle types; • maximum vehicle weights; • axle configurations; • daily movement numbers; • vehicle speeds; • road condition; • distance from the church; • local ground conditions; and sensitivity of the historic building and glazing.	
WR-HP-013	Noise and Vibration	Appropriate project-specific vibration alert and action levels should be agreed before construction. These should not simply adopt thresholds concerned with prevention of structural damage to modern buildings.	The Applicant notes this comment and refers to its response to WR-CUL-012 in Table 3.15 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		They should take account of the presence of exceptionally fragile and irreplaceable historic fabric. Exceedance should trigger an agreed response, potentially including suspension of HGV movements pending investigation.	
WR-HP-014	Traffic and Access Cultural Heritage Noise and Vibration	**H. Highway Maintenance** The carriageway should be inspected before commencement and maintained throughout the construction period. Potholes, depressions, defective covers and other irregularities capable of increasing dynamic vehicle loading and vibration should be promptly rectified. **I. Periodic Inspection** The medieval glass should be inspected periodically during the principal construction traffic phase, particularly following any significant vibration event or exceedance of agreed monitoring thresholds. **J. Post-Construction Survey** Following completion of the relevant construction phase, the glazing and church fabric should be resurveyed and compared directly with the baseline condition record.	The Application notes these comments and refers to the following responses in Section 3 of this document: • WR-TRA-023 regarding traffic routing and vehicle forecasts. • WR-TRA-025 regarding highway works, vegetation and property access. • WR-CUL-012 regarding construction traffic and vibrations effects on heritage.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-HP-015	Water Environment	Historically there was a ford from Wash Lane to what is now the often inadequate WOODEN-SIDED open culvert drainage ditch built following the 1967 flood running alongside the proposed AIL route. The drainage system water from Church Hill meets the water from the Wash Lane catchment. Its confluence is as the side of the war memorial on the actual Saxlingham Street. The actual AIL route. An inadequate pipe/conduit which inevitably silts up despite clearing, was inserted, from Wash Lane, by the War Memorial under the AIL route to the same ditch. So in reality this remains a ford especially between October and April The water is then intended to go through the open culvert.	The Applicant refers to WR-WAT-009 in Table 3.14 regarding construction traffic and drainage.
WR-HP-016	Water Environment	There are therefore (in my layman's terms) two kinds of flood 1. Floods from run off along from Wash Lane: the volume being too great for the pipe and so the water passes the War Memorial and crosses at the junction of Church Hill and Saxlingham Street. The highly contentious corner on the proposed AIL route and enters the open culvert into the wooden sided ditch alongside the AIL route on a very regular	The Applicant refers to WR-WAT-009 in Table 3.14 regarding construction traffic and drainage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		basis between October and April. Running over the hidden pipe. 2. Every so often the volume of water from the confluence of Wash Lane, combined with the water from Church Hill exceeds the volume of the pipe and ditch and flows excessively down Saxlingham Steet, (The proposed AIL route), risking the flooding of houses from both the street and ditch.	
WR-HP-017	Water Environment Traffic and Access	The proposed AIL route runs the length of the Street ditch. This is wooden-sided and therefore would be at great risk from the weight and proximity of AIL vehicles potentially going nearer its wall than current traffic. If the ditch were to cave in along the proposed AIL route, the risk of major flooding and vehicular swash to many of our cottages would be greatly increased. On the proposed AIL route If the pipe under the join of Church Hill and Saxlingham Street were to crack or worse under the weight of the AIL lorry we would be totally at the mercy of the weather. At some point very major flooding would be inevitable. If the proposed AIL route meant the railings were to be temporarily removed there would be huge health and safety issues re	The Applicant notes this comment and refers to its response to WR-TRA-028 in Table 3.17 and WR-CUL-012 in Table 3.16 regarding impacts to Church Hill. The Applicant also refers to WR-WAT-009 in Table 3.14 regarding construction traffic and drainage.

ID	Theme	Comments/Issues Raised	Applicant's Response
		such a fast flowing deep water ditch being freely accessible.	

2.15 John Robert Cawston

Table 2.15 Applicant's Response to John Robert Cawston [REP1-140]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-JRC-001	Consultation and Engagement	There has been no consultation between us and Green Island Power or their representatives as to the route that this cable should take. A great many years have been invested in our farm to keep the land in prime condition including drainage on all of our fields to prevent flooding and run-off and which has cost us a huge amount of time and money. If this cable corridor is approved my many years' experience tells me that all of this soil improvement will be lost.	The Applicant notes this comment and refers to its response provided to Mr Cawston under CON-080 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. The Applicant acknowledges the concerns raised by the Respondent regarding the proposed cable route across their land. The Applicant has engaged directly with the Respondent and met with them in person in 2025 to discuss the Scheme. Since that meeting, the Applicant has continued engaging with the Respondent's appointed agent regarding the proposed Heads of Terms for cable routing. The Applicant will engage with affected landowners and occupiers regarding access arrangements, the provision of crossing points where necessary, drainage, and detailed construction planning to reduce disruption to farming activities in advance of construction works. Any temporary farming business losses as a result of the works or disruption experienced by affected landowners would be addressed through the statutory compensation framework.

2.16 Kathleen Reynolds

Table 2.16 Applicant's Response to Kathleen Reynolds [REP1-432]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KR-001	Transport and Access	At the Planning Inspectorate hearings 15th-17th September, a number of representations were made regarding the proposed AIL route through **[REDACTED]** Saxlingham Nethergate. I would be pleased if the Planning Inspectorate were able to visit to see the issues for residents like ourselves.	The Applicant notes this comment and refers to the following responses in Section 3 of this Document: • WR-TRA-014 relating to proposed AIL route through Saxlingham Nethergate. • WR-CUL-012 regarding impacts to Church Hill.
WR-KR-002	Transport and Access	I would like to add some more detail to the written representation I made on the 3rd June 2006, to explain the potential impact of the AIL route on my property **[REDACTED],** which I jointly own with my husband. The 16th/17th century **[REDACTE]** is directly adjacent the road (Photo 1). Vehicles already mount the small verge, inches from **[REDACTED]** due to the narrowness of the road. I am extremely concerned that vibration from the heavy AILs proposed to trave l**[REDACTED]** along or any oversail of the AILs onto the verge, could damage the **[REDACTED]**.	The Applicant notes this comment and refers to the following responses in Section 3 of this Document: • WR-TRA-014 in Table 3.17 relating to proposed AIL route through Saxlingham Nethergate; and • WR-CUL-012 in Table 3.16 regarding impacts to Church Hill.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KR-003	Transport and Access	The road facing retaining wall of the **[REDACTED].** Photo 2 shows the alignment of the wall, hedging and trees **[REDACTED]**. Any removal of the wall, trees and hedging to widen the road could potentially cause damage **[REDACTED]**. It is a vulnerable, unconverted building, which if damaged could cause risks to road users and all the internal contents (cars, fuel store etc).	The Applicant notes this comment and refers to its response to WR-TRA-014 in Table 3.17 and WR-CUL-012 in Table 3.16 regarding impacts to Church Hill.
WR-KR-004	Transport and Access	The entrance drive to **[REDACTED]** is on the blind bend of **[REDACTED]**, which is already dangerous. The section of the drive between the outbuilding and the road surface (1.4m) is essential for safe access and egress into the courtyard, for ourselves and the two neighbouring properties, by foot or vehicle. The mirror opposite (road furniture) is essential to see traffic coming from the right. Please see Photos 3 and 4. Any damage or reduction to this drive entrance would make the situation even more dangerous. The pavement opposite is the only safe place to walk.	The Applicant notes this comment and refers to its response to WR-TRA-014 in Table 3.17 and WR-CUL-012 in Table 3.16 regarding impacts to Church Hill.
WR-KR-005	Transport and Access	Under the verge and at the front of the **[REDACTED]** are BT services, water mains stopcock and sewage service point. A small Anglia Water leak near the stop cock (Photo 3) has taken 4 months for the work to be scheduled and will require the whole road to	The Applicant notes this comment and refers to its response to WR-TRA-014 in Table 3.17 and WR-CUL-012 in Table 3.16 regarding impacts to Church Hill.

ID	Theme	Comments/Issues Raised	Applicant's Response
		be closed for 3 days for the repair to be done correctly and safely. This indicates the type of disruption even a small amount of infrastructure damage can cause at this vulnerable place and makes us worried about the AIL risks to infrastructure.	
WR-KR-00	Human Health	The stress of this scheme has already had health impacts in my family and I ask the Planning Inspector to seriously consider the harm this scheme is having to health and wellbeing.	The Applicant notes this comment and refers to its response to WR-HUM-001 in Table 3.27 regarding human health impacts. The Applicant acknowledges the reported effects of stress on the resident and their family and recognises the seriousness of concerns regarding physical and mental wellbeing. The Human Health Summary Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** recognises that large-scale infrastructure projects may affect mental wellbeing through perceived environmental change, disruption, uncertainty and concern about potential risks. These matters are also considered through the **Equality Impact Assessment [APP-214].** Taking account of the Scheme design and proposed mitigation, the Human Health Summary Statement and Equality Impact Assessment conclude that the Scheme would not result in likely significant adverse effects on population and human health during construction, operation or decommissioning. This population-level conclusion does not seek to discount or diminish the health and wellbeing effects reported by individual residents.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The **Mental Health and Wellbeing Addendum [REP1-107]** provides further consideration of the evidence and representations submitted during the Examination, including individual accounts of stress, anxiety and distress. Having considered this additional evidence, the Addendum supports the conclusions of the Human Health Summary Statement and Equality Impact Assessment and does not alter the overall population-level conclusion.

2.17 Kevin Michael Haslam

Table 2.17 Applicant's Response to Kevin Michael Haslam [REP1-143]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KMH-001	Socio-Economics Landscape and Visual	I run a touring caravan and campervan site overlooking Site 8B. Guests choose the site for rural views, peace, dark skies and access to Boudicca Way; the proposed panels would undermine the character of the business and have led me to pause investment in new facilities.	The Applicant notes this comment and refers to its response to WR-SOC-002 in Table 3.19 regarding impacts to local businesses.
WR-KMH-002	Public Rights of Way Landscape and Visual	Guests regularly walk from the campsite towards Boudicca Way and Little Wood SSSI. Solar panels around Site 8B would fundamentally alter the experience of these routes.	The Applicant notes this comment and refers to its response under WR-REC-001 in Table 3.16 regarding impacts to PRoWs in general. The Applicant provides a response to concerns regarding Boudicca Way under WR-REC-008 in Table 3.16. The Applicant refers to its response to WR-ARB-004 in Table 3.13 regarding concerns about the Scheme's impact to SSSIs.
WR-KMH-003	Soils and Agriculture Site Selection and Alternatives	Sites 8A and 8B are on a north-facing slope with Grade 2 and 3a agricultural land; I question the suitability of the location for a solar installation and the loss of this productive land.	The Applicant notes this comment and refers to its response to WR-SOI-001 in Table 3.20 regarding the use of agricultural land. Furthermore, the Applicant refers to WR-ALT-016 in Table 3.8 regarding the site selection process for Site 8.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-KMH-004	Water Environment	Sites 8A and 8B slope towards the River Tas, a chalk stream. Increased surface-water runoff could worsen flooding in downstream villages; the effects need to be fully assessed.	The Applicant notes this comment and refers to its response under WR-ECO-014 in Table 3.12 regarding the River Tas and chalk stream.

2.18 Matthew David Scott

Table 2.18 Applicant's Response to Matthew David Scott [REP1-306]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-MDS-001	Scheme Description	Please disregard the previous submission under reference **[REDACTED]** which was my wife's submission which was incorrectly filed under my reference. My wife has since submitted her representation under her reference **[REDACTED]**. Here is my correct submission: I am, with my wife, the joint owner/occupier of **[REDACTED]** which is within a cluster of barns at Gowing Way which would be surrounded by the proposed Site 5 within the proposed scheme.	The Applicant has provided a response to Catherine Scott in Table 2.6 of this document. The Applicant refers to its response under WR-LAN-024 in Table 3.10 regarding Site 5 landscape impacts.
WR-MDS-002	Cultural Heritage	I object to the proposed scheme. I have no objection to solar schemes generally, but this attractive rural area is entirely unsuitable for a major national solar scheme, with all of the associated infrastructure. The vast proposed substation in Site 5 couldn't be in a less appropriate place, within an historic landscape, just across from St Catherine's Church, Fritton, built in the 15th century.	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-ALT-021 in Table 3.8 regarding the siting of the Project Substation in Site 5; and • WR-CUL-008 in Table 3.15 regarding impacts to heritage assets near Site 5.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-MDS-003	Ecology and Biodiversity	We own the wood to the south of our property, which is directly adjacent to the proposed solar PV site. Our property includes woodland, a small orchard and three ponds and is a haven for wildlife, with regular sightings of a variety of deer, foxes, bats and numerous birds including barn owls, kingfisher, heron, egrets, little owls and grey wagtails. These species thrive in the existing rural landscape. There are many newts in our ponds. The deer roam across site 5 and into our wood, particularly through the southern boundary, adjacent to the proposed site. We use the footpaths across site 5 to walk and run and to visit the Church. The proposed scheme would industrialise and destroy the surrounding environment.	The Applicant notes this comment and refers to the following responses in in Table 3.12 of Section 3 of this document: • WR-ECO-001 regarding wildlife impacts. • WR-ECO-004 regarding birds. • WR-ECO-005 regarding bats. • WR-ECO-006 regarding newts. • WR-ECO-007 regarding deer. • WR-REC-001 regarding PRoWs and footpaths.
WR-MDS-004	Ecology and Biodiversity	My wife emailed Dalcour Maclaren on 04/05/06 regarding a letter we'd had asking for a survey on our property and notified them of the need to survey the bats and newts. On 18/06/26 she received a text message from a **[REDACTED]** on an unknown number asking to visit our property the next or the following day. This was not possible and my wife asked for a formal letter identifying who this person was and	The Applicant notes the comments raised by the respondent with regards to arranging access for surveys. Following identification of ponds within the Respondent's landholding, the Applicant's agent wrote to the Respondent on 20 April 2026 seeking survey access. The Respondent subsequently confirmed access could be provided and this was passed to the Applicant's ecologist to arrange access. Contact was made on 18th June 2026 to arrange access, however the proposed dates were not suitable and due to the great crested newt season

ID	Theme	Comments/Issues Raised	Applicant's Response
		suggesting other dates and pointing out that we have 2.5 acres of woodland directly adjacent to site 5. Nothing further has been heard from him or Dalcour Maclaren and no surveys have been carried out by them.	ending on 30th June 2026 there was insufficient time within the survey programme to re-arrange access. The Applicant wants to make the respondent aware that where ponds have not been surveyed, a precautionary approach has been adopted with an assumed presence of great crested newts. The **Design Principles, Parameters and Commitments [REP1-078]** sets out minimum offset distances that will be applied to ponds. Results of the great crested newt survey (eDNA) can be found in **ES Volume 3, Appendix 8.3 - Great Crested Newt Survey Report [REP1-048]**. The Applicant confirms that Bat Surveys have been undertaken in the surrounding area. Access was not required via the respondent's property and was obtained through neighbouring land. **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** provides the results of the bat activity surveys
WR-MDS-005	Soils and Agricultural Land	The village of Fritton and the neighbouring village of Hempnall are ancient, historic parishes, both of which are mentioned in the Doomsday Book. The landscape throughout the scheme comprises productive arable land and in many parts is scenic, gently rolling countryside and has always been a desirable place to live and work. The scheme proposes to turn this gentle rural landscape into semi-industrial land which will never be returned to agriculture, causing a loss of food	The Applicant notes this comment and refers to its responses under WR-SOI-001 and WR-SOI-002 in Table 3.20 regarding the use of agricultural land and food security.

ID	Theme	Comments/Issues Raised	Applicant's Response
		production and compounding a rising lack of food security in the UK.	
WR-MDS-006	Cumulative Effects	Whilst I believe that solar power has its place, along with other renewables, our county of Norfolk is taking a disproportionate share of national infrastructure schemes, degrading our rural landscapes with no benefit to local residents and with questionable contributions to net zero.	The Applicant notes this comment and refers to its response under WR-NEE-001 in Table 3.4 regarding the need and benefits of the Scheme.
WR-MDS-007	Cumulative Effects	This scheme in particular is entirely unsuitable for an area of attractive small South Norfolk villages and is causing enormous concern to local residents and more widespread concern about the effects of a multitude of major infrastructure projects on the county generally.	The Applicant notes this comment and refers to its response under WR-COM-001 in Table 3.30 regarding cumulative impacts and WR-BEN-001 regarding the benefits of the Scheme.
WR-MDS-008	Transport and Access	The fact that the developer needs to make provision for additional highway visibility splays and to allow for the removal of roadside vegetation (which presumably includes trees) in order for abnormal loads to pass through its historic villages is because of the complete inappropriateness of the local rural and village landscape and small country roads for this scheme.	The Applicant notes this comment and refers to its response under WR-TRA-022 in Table 3.17.

2.19 Neville Earl

Table 2.19 Applicant's Response to Neville Earl [REP1-379]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NEA-001	Consultation and Engagement	I have already explained my objections in my statement that East Pye Solar are calling RR-1383 in their document that puts all their responses together, called PDA-012. I'm not repeating those here but am writing because some of my concerns have not been answered, and some things listed against me are not things I said.	The Applicant notes this comment.
WR-NEA-002	Transport and Access	**The East Pye Solar is looking at the wrong culvert** The reply in TRA-043 about Boylandhall Lane does not answer my concern. The culvert carrying water from the field next to Site 5 under Boylandhall Lane and into the field is a different culvert. I am asking about the old brick tunnel carrying the Site 5 stream under the main B1527 road, through Boyland Hall land and onwards towards the River Tas.	The Applicant notes this comment and refers to its response under WR-WAT-020 regarding existing flood and surface water run-off at Boylandhall Lane.

ID	Theme	Comments/Issues Raised	Applicant's Response
		If East Pye Solar is relying on where access crosses Boylandhall Lane, or saying that lane will not carry heavy lorries, it is looking at the wrong structure. My concern is about the heavy vehicles using the B1527 above the old brick tunnel. I know this tunnel from having walked through it when I was younger. I want East Pye Solar to identify it correctly on a plan, inspect its condition and explain whether it can safely take the proposed heavy loads. It must also explain how it will prevent damage that could block the stream and worsen flooding or lead to it collapsing. It is extremely old and needs protecting. An answer about a different culvert does not settle this.	
WR-NEA-003	Water Environment	**Concerns which still need answers** In WAT-020, East Pye Solar gives a general answer about grass cover and drainage. I cannot see an answer about the existing flooding at the ditch and culvert opposite my home, near the proposed access. What checks have been made there, and how will flooding be prevented from getting worse during construction?	The Applicant acknowledges flooding history within the vicinity of the Order Limits (although detail provided in Norfolk Flood Incident Reports is not property level) within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**. Mitigation in relation to construction including location of compounds outside of areas of Flood Zones 2 and 3, and outside of areas of 'low' to 'high' surface water flood risk. Access tracks and construction compounds will have

ID	Theme	Comments/Issues Raised	Applicant's Response
			appropriate surface water runoff and sediment management as secured within the **Outline CEMP [REP1-058]**. Flood risk mitigation outlined within the **Design Principles, Parameters and Commitments [REP1-078]** and **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** will ensure that there is no increase in flood risk outside of the Order Limits from all phases of the Scheme.
WR-NEA-004	Noise and Vibration	My reference is included in NOI-002, but I cannot find a separate answer there about construction noise and vibration. if another section is meant to answer it, please identify it and explain how it applies to my home and wood yard.	The Applicant notes this comment and refers to its response under WR-NOI-001 in Table 3.22.
WR-NEA-005	Socio-Economics	I also cannot find a clear answer about the effect on my particular wood yard. A general reply about businesses does not explain how my business, its access and day to day work will be affected.	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** does not comment on effects on particular businesses. Whilst not every business will necessarily benefit from, for example, supply chain or skills opportunities, there is nothing in the effects identified to suggest there will be adverse socio-economic effects to a wood yard in the area. The transport and access effects of the Scheme including access to homes and businesses have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and are supported by the **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203]**. The assessment concludes that, with the proposed management and mitigation measures in place, effects with regards to transport and access would not be significant. Where temporary traffic management measures

ID	Theme	Comments/Issues Raised	Applicant's Response
			are required during construction, these will be designed to minimise disruption and maintain access to properties and businesses wherever practicable.
WR-NEA-006	Transport and Access	The traffic replies do not clearly explain how large construction vehicles will safely pass on the narrow stretch of B1527 I described.	The Applicant notes this comment and refers to its response under WR-TRA-019 in Table 3.17 regarding the B1527.
WR-NEA-007	Ecology and Biodiversity	Nor can I find a clear answer showing how fencing the Site 5 fields will avoid pushing deer onto that road.	The Applicant notes this comment and refers to its response under WR-ECO-007 in Table 3.12 regarding deer.
WR-NEA-008	Ecology and Biodiversity	The replies about planting, wildlife and lighting give general promises. I still cannot see how the effects immediately around my home have been answered, including the loss of old hedges and trees, disturbance to existing wildlife and the change to dark skies.	The Applicant notes this comment and refers to the following responses in Section 3: • WR-LIG-003 regarding dark sky impacts. • WR-ARB-001 regarding potential impacts to hedges. • WR-ECO-001 regarding wildlife impacts.
WR-NEA-009	Cumulative Effects	Most of all, I cannot see where East Pye Solar has considered what these effects mean together for someone who both lives and works so close to this construction.	The Applicant notes this comment and refers to its response under WR-COM-001 in Table 3.30 regarding cumulative and in-combination effects.
WR-NEA-010	Consultation and Engagement	**Things I did not say** The following points are linked to me but were not in my representation: ***Applicant's Note**: The following page of the scanned Written Representation*	The Applicant notes this comment.

ID	Theme	Comments/Issues Raised	Applicant's Response
		is not legible in the copy submitted, so the individual points referred to under this heading have not been reproduced here.	
WR-NEA-011	Consultation and Engagement	My original objection still stands. I ask that it is read alongside this statement, rather than relying only on East Pye Solar's grouped summaries that are not correct.	The Applicant notes this comment.

2.20 Nigel Stringer

Table 2.20 Applicant's Response to Nigel Stringer [REP1-340]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-NST-001	Water Environment	Please see attached Google map plan of site affected.[1] The water supply to our property is a spring fed well at the rear of the house where the well pump feeds water from the ground supply to the house. The supply level water depth is between 1m and 2.5m below ground level depending on the season. It is our only water supply, we have no mains connection. Without it, we cannot live there.	The Applicant notes this comment and refers to its response to Mr Stringer under comment NS-001 in Table 2.14 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.
WR-NST-002	Water Environment	Furthermore, there is an ancient drainage tunnel through our grounds to the west of the house which drains water from the fields to the south of our property (Site 5) with further access points as it crosses our land and continues into the meadows to discharge onto the low-lying land, the very point from where our well is fed. Any contamination of that drainage system will leach into the meadows and hence affect our well water. The water	The Applicant notes this comment and refers to its response to Mr Stringer under comment NS-001 in Table 2.14 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.

[1] Available to view on page 3 of [REP1-340]

ID	Theme	Comments/Issues Raised	Applicant's Response
		run-off from site 5 will flow directly to that drain and across our land to the meadows, adjacent to our supply.	
WR-NST-003	Water Environment	I put the Inspectorate on notice that this will be an ongoing and obvious health risk to anyone living in Boyland Hall. I have notified East Pye of this and have had no response. To avoid the possibility of any understatement or misunderstanding I state again: The proposal incurs an ongoing risk of contamination / poison to our water supply which is obvious. The water run off from Site 5 will include residue from construction activities and ongoing maintenance for the foreseeable future, eg washing of solar panels. The slope of the landscape dictates that all of that water will drain into the tunnel and across our land.	The Applicant notes this comment and refers to its response to Mr Stringer under comment NS-001 in Table 2.14 of **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Response [REP1-099]**.
WR-NST-004	Water Environment	I put East Pie on notice via the Inspectorate: If development commences on Site 5 I shall immediately, for the safety of my family and wider public, commence ongoing and regular water tests to the drainage water across our land. If contaminants are found I shall take swift legal action to obtain a Court Injunction to obtain a stop notice on the development. I suggest it may be prudent for East Pye	The Applicant notes this comment. Mr Stringer has been contacted by the Applicant, who welcomes engagement to assess his PWS. Details are sought on the location, depth and construction (e.g., the depth of the borehole/well, and the depth that the borehole/well is lined to) to inform the Applicant's assessments.

ID	Theme	Comments/Issues Raised	Applicant's Response
		to engage water engineers and their legal team at this early stage before proceeding further. I am open to consultation. Quia Timet may be engaged. EN0110014-000767-Water Supply	

2.21 Patricia Leate

The Written Representation attaches the Interested Party's earlier OFH1 oral submission and four supporting photographs. As the substantive matters raised in that oral submission are addressed again in the Written Representation and captured below, the attachment has not been reproduced separately. Please refer to [REP1-244] for the supporting photographs and OFH1 submission in full.

Table 2.21 Applicant's Response to Patricia Leate [REP1-244]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PL-001	Transport and Access	**First bullet point of the document named 'Patricia LEATE's OPH1 input' attached.** This bullet point outlines the major problems already being experienced on a regular basis in Church Hill, Saxlingham Nethergate. Parts of the road are extremely narrow (Wynn's swept path map has the narrowest point at circa 4.11 metres (maps can be found in the Transport Assessment Part 3 Page 58). Far too narrow for the AIL vehicles. 2 photos were shown as the OFH1 (photos Church Hill 1 & Church Hill 2). These photos show the situation when two-way traffic involves larger vehicles. The Planning Inspectorate wanted to know the frequency of the buses travelling through Church Hill. I	The Applicant notes this comment and refers to its response provided to Saxlingham Nethergate Parish Council under comment SNPC-002 in **The Applicant's Response to Relevant Representations Part 4 – Parish and Town Councils, and Parish Meetings [PDA-011]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		was unsure of the frequency at the OFH1 session as the buses have just changed their bus routes to accommodate improved transport for school children in the local areas. Looking at the revamped timetable there are 12 buses travelling via Church Hill Monday to Saturday. I did mention, when asked the frequency by the Planning Inspectorate, that the buses aren't the crux of the problem. Basically, it is any vehicle larger than a small car size that completely stops/slows down traffic flow. Photo 'Church Hill 4' is another example of slowed traffic flow due to the narrowness of Church Hill.	
WR-PL-002	Transport and Access	My third bullet point outlines the precarious access for vehicles and pedestrians accessing Orchard View Barn Courtyard in Church Hill. Photo 'Church Hill 3' shows a typical access situation – the driver of the mini car coming down Church Hill has to slam on their brakes as they see a vehicle is exiting from the courtyard. This photo also shows the dangerous situation where the driver exiting the courtyard has hardly any notice should a car come round the bend from 'The Street'.	The Applicant notes this comment and refers to its response under WR-TRA-028 in Table 3.17 regarding Church Hill.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PL-003	Transport and Access	My fourth bullet point outlines the risks to a number of structures in Church Hill and how the very heavy vehicles could also damage the infrastructure beneath the road stating that I believed the sewer at the top of Church Hill, which has leaked in the past, to be made of asbestos. Enquiries with our water supplier, Anglian Water, has ascertained the following information: The correct name for Asbestos Sewers is pitch fibre. These were popular post-war but quickly found to be not fit for purpose and most existing ones are now well beyond their shelf life. A few years ago there was a prolonged road closure just before the bend at the top of Church Hill near Low Farm Cottages while Anglian Water tried to undertake a repair and ended up having to 'sleeve' failing pitch fibre sewer pipes. It is known for definite that there is pitch fibre in that area but it isn't known how far it stretches. This April, Anglian Water, in the absence of any information on file, physically checked the nature of the sewers here (at the bottom of Church Hill) and confirmed they were made of	The Applicant notes this comment and refers to its response to Block East Pye Solar under comment BEPS-316 in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Vitrified Clay. However, what is not known is what's happening sewer 'fabric' wise between the bottom and very top of the Church Hill.	
WR-PL-004	Transport and Access	I don't believe that anyone has visited Saxlingham Nethergate and undertaken a thorough assessment of the village as a potential AIL/HGV route and I believe that any assessment is likely to have been a desktop exercise. Anyone visiting would immediately see that AILs are far wider than the road in places. In my summing up of my input at the OFH1 I asked that the Examining Authority should visit Saxlingham Nethergate to undertake a thorough risk assessment, the Planning Inspectorate asked that I include this request in my Written Representation.	The Applicant notes this comment and refers to its response under WR-TRA-014 in Table 3.17 regarding Saxlingham Nethergate AIL routes.
WR-PL-005	Ecology and Biodiversity	**Additional issues that came to light at the Open floor hearings/issue specific hearings which deeply concern me are as follows:** **Wildlife Mitigation** With regard to the areas included in East Pye's proposal we all know that we can never re-create the spectacular	The Applicant notes this comment and refers to its response under WR-ECO-001 in Table 3.12 of this document. The Applicant acknowledges the importance of local ecological expertise and has engaged with Norfolk Wildlife Trust throughout the development of the Scheme. The Applicant has not dismissed Norfolk Wildlife Trust's representations, and these matters continue to be recorded and discussed through

ID	Theme	Comments/Issues Raised	Applicant's Response
		countryside, habitat and wildlife we currently have therefore the impact on wildlife should be mitigated as far as possible by thoroughly assessing and documenting mitigation actions within the planning, implementation, maintenance and decommissioning plans. I have severe worries regarding the lack of wildlife mitigation activities taking place. **[REDACTED]** at the Issue Specific Hearing 1 – Part 4 (video timing 46.38-49.45), outlined his concerns which totally echo mine in that when a project such as this is started you have to have a strategy that acknowledges the fact that having high fences (2.4 metre deer fencing, 3 metre industrial-type fencing) cordoning off equipment blocks, solar arrays, site compounds (lifetime being c2 years) the planned mitigation seems to be that when everything is working hedgerows will be put in, etc. This lack of planning/mitigation at the outset is definitely going to adversely affect the abundance of wildlife in the area covered by the East Pye Solar Plan. The Norfolk Wildlife Trust recommended a document in their relevant representation, but this seems	the **Statement of Common Ground with Norfolk Wildlife Trust [REP1-088]**, where a number of ecological issues remain under discussion. Norfolk Wildlife Trust's examination advice includes matters relating to commuting corridors, habitat functionality, lighting controls and the enforceability of mitigation commitments, all of which are being actively considered through the Examination process. The Applicant's position is that the Scheme has been developed using an environmentally led design approach, with ecology and biodiversity embedded within the design evolution, design buffers and mitigation strategy. The mitigation hierarchy has been applied throughout the design process, and mitigation is secured through the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]**, the **Outline DEMP** [**REP1-062**], **Outline LEMP [REP1-064]** and the **Outline Protected Species Mitigation Strategy [REP1-050]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		to have been dismissed as the Applicant stated that guidance has been carried out by the relevant statutory nature conservation body, Natural England, which reports that there is no conclusion of likely significant affect. In my view the Norfolk Wildlife Trust should be listened to because of their in-depth/broad local wildlife knowledge. I would urge the Planning Inspectorate to assess Norfolk Wildlife Trust's submitted documentation.	
WR-PL-006	Landscape and Visual	**Night lighting** Night lighting was also raised separately as an issue at the hearings, highlighting that the area does not currently have any night lights and the impact of lighting for some wildlife would be severe. The Applicant's view was that no adverse lighting would be installed. However, they failed to give details of the lighting that was proposed to understand their view of adverse lighting.	The Applicant notes this comment. Lighting will only be operational when the Site is occupied. luminaires with zero upward light ratio (ULR) will be used to ensure light does not spill into the night sky. The luminaires will be orientated so that they are pointing towards the compounds and away from any boundaries. Shields will be utilised to further minimise light spill if required.
WR-PL-007	Other Environmental Matters	**Safety** I have outlined many of my issues in previous documents submitted in the past but an additional aspect of safety	The Applicant notes this comment and refers to its response under WR-AVI-001 in Table 3.28 regarding Tibenham Airfield.

ID	Theme	Comments/Issues Raised	Applicant's Response
		relating to East Pye's plans was evidenced when the Tibenham Airfield was discussed which outlined that East Pye were proposing to have solar panels installed on the emergency run off area at the airfield!	
WR-PL-008	Cumulative Effects	Having sat through a large part of the different hearings where so many insurmountable issues came to light, I am even more convinced that the East Pye Solar Plan is totally unsuitable for the proposed areas and absolutely disastrous for Norfolk business/residents/wildlife/tourist industry due to the cumulative impact of all the different solar/windfarm/pylon projects underway/planned. The Applicant's own Statement of Need accepts that prioritised schemes already meet the relevant Clean Power 2030 regional solar capacity ranges for 2031-5 therefore East Pye Solar is not specifically needed in this location or region to meet stipulated targets.	The Applicant notes this comment and refers to the following responses provided in Section 3 of this document: • WR-COM-001 in Table 3.30 regarding cumulative effects. • WR-NEE-001 in Table 3.4 regarding the need for the Scheme.

2.22 Pauline Earl

Table 2.22 Applicant's Response to Pauline Earl [REP1-380]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PE-001	Consultation and Engagement	I am writing about the Applicant's response to my Relevant Representation in PDA-012. My original concerns remain, but I do not want to repeat them all here. This submission explains what I believe has not been answered and which points were not mine. I find computers and email difficult. Someone else has had to help me find where East Pye Solar has replied to my points. I understand they used artificial intelligence, called ChatGPT, to search the reply document called PDA-012 and compare it with what I originally wrote. East Pye's document gives my comments the reference number RR-1515 and it was very tricky to find where this is mentioned and work out which replies relate to me. These remain my own concerns. It shows how difficult this document is that this much help was needed just to	The Applicant notes the concerns raised. The consultation approach, responses and accessibility measures are recorded in the Consultation Report, while Interested Parties may continue to participate through the Examination. The Outline CEMP provides for community liaison during construction; any attribution or indexing issue should be read against the original representation and the substantive response. The Applicant notes this comment and refers to its response regarding navigating DCO documents under comment CON-002 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. The Applicant's Community Relations team remains available to assist members of the public via a series of free-to-use communication channels (phone, post and email) with the DCO documentation.

ID	Theme	Comments/Issues Raised	Applicant's Response
		find the replies to my comments. I could not have done this on my own.	
WR-PE-002	Consultation and Engagement	**Points I did not raise** My number has been included against the following points, which I did not raise in my representation: • C&D-018: Thermal drones, faulty panels, bypass diodes and hotspots. • SOC-001: Property values or a fall in the value of my home. • SOC-002: Effects on the local economy and local businesses. • WAT-017: Pollution reaching the River Tas through Wacton - I don't live anywhere near Wacton. • TRA-043: Construction traffic damaging an old brick tunnel. I mentioned a stream going under the road, but did not comment on damage to the brick tunnel. • SCH-003: The development changing from 40 years to 60 years.	The Applicant notes this comment. Each RR submitted by members of the public have been systematically reviewed and a summary of issues raised has been prepared. These summarises are presented alongside the corresponding unique comment ID, enabling a clear audit trail between the original representation and the Applicant's response. The Applicant therefore had regard to all RRs received and has provided a response to issues raised. The Examination process, led by the Examining Authority, will further consider all RRs, alongside the Application's responses and any subsequent submissions, in reaching a recommendation on the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• ECO-003: Questions about the Environment Act 2021. I raised concerns about wildlife, but did not refer to this Act. • C&D-006: Whether the land would become brownfield land or a request for detailed decommissioning guarantees. My concern was that the countryside could not truly be returned to how it is now. I understand that the Applicant has grouped people's concerns together. But including my number against these points makes it unclear what I actually said and whether my own concerns have been answered. I am not saying these matters are unimportant, only that they were not the points I raised.	
WR-PE-003	Noise and Vibration	**Points which still need answers** For construction noise and vibration, RR-1515 is listed under NOI-002, but there does not seem to be a separate reply there. If the reply to another section is meant to cover this, please explain that clearly.	The Applicant provided a joint response to themed comments around construction noise impacts. This response can be found under WR-NOI-001 in Table 3.22.
WR-PE-004	Noise and Vibration	My number is missing from NOI-003, which deals with noise once the	The Applicant notes this comment and refers to its response under WR-NOI-002 in Table 3.22 regarding noise from solar PV

ID	Theme	Comments/Issues Raised	Applicant's Response
		development is operating, even though I specifically said I was concerned about humming from the substation and noise from tracker motors. I want to know which assessment and reply deal with the noise we would hear at our home.	tracker panels and its response Under WR-NOI-003 regarding noise from substations. **The Outline OEMP [REP1-060]** secures the commitment that the rating level from operational elements other than the BESS will not exceed the background sound level at residential receptors, and that sound levels from the BESS will not exceed those outlined in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**.
WR-PE-005	Transport and Access	The general traffic replies do not explain how I will safely get in and out of my driveway with the construction access so close. Referring to a traffic management plan does not give me a clear answer about my own access.	Section 7.9 within the **Outline Construction Traffic Management Plan [REP1-068]** confirms a range of Temporary Traffic Management measures that can be used to protect the integrity of the public highway and the safety of road users. This includes the use of Traffic Marshals or Banksmen at Sites, Sub-Sites and CRC access points to aid with vehicle manoeuvring including the use of Stop Works boards.
WR-PE-006	Water Environment	For flooding, I cannot see where East Pye Solar has considered my home being below the road drains, the drains already struggling, or the flooding outside my home and the main road near Boylandhall Lane. I would like it to explain where these particular problems have been checked.	The Applicant notes this comment and refers to its response under WR-WAT-020 in Table 3.14 regarding flooding and drainage on Boylandhalll Lane located along the western boundary of Sub-Site 5A.
WR-PE-007	Ecology and Biodiversity	I also still need a clear answer about the risk of fencing pushing deer from the fields onto the B 1527. General replies about wildlife do not explain how this danger would be prevented here.	The Applicant notes this comment and refers to its response under WR-ECO-007 in Table 3.12 regarding deer.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PE-008	Scheme Description and DCO Process	**Questions about our property remain unanswered** Since my representation was published, the land agent has contacted me directly by email. I have replied because important questions remain unanswered, although I have said many times that email is difficult for us and we prefer letters. I understand East Pye Solar says our house and garden are not needed. That does not explain what it wants from any ground beneath the road which may belong to us. We have asked: • Whether it wants to buy the ground compulsorily or take permanent rights over it, what would be put there and why. Whether there could be future digging or maintenance, and whether anyone would have a right to enter our driveway or garden. • How vehicle and pedestrian access to our home would be maintained, including during any temporary restrictions.	The Applicant has confirmed that no part of the respondents registered HMLR title is within the order limits for the Scheme. The Applicant has engaged with the affected land interest as its landholding adjoins a section of the B1527 road. Under the rules of Ad Medium Filum, it is assumed that the affected land interest has rights over the subsoil of this section of road (plot number 09-021) and has therefore communicated with the land interest regarding the Scheme. The Applicant is not looking to purchase any part of the respondent's property, impose permanent rights over it or undertake any works on or over it. Vehicle and pedestrian access to the respondent's property will be maintained at all times.

ID	Theme	Comments/Issues Raised	Applicant's Response
		For written reassurance that our hedges, trees and roots would be protected from damage. Whether rights would be recorded against our property, need mentioning if we sold it, and whether compensation would be payable. For a paper copy of the plan and plot number showing exactly what land is involved. Until we have clear written answers, our concerns about the land issue are not resolved.	
WR-PE-009	Consultation and Engagement	I ask the Examining Authority to ask East Pye Solar for a short individual reply answering my actual concerns and correcting the points wrongly linked to me. Please provide important information in simple language by letter. Please also consider my original representation in full, alongside this submission, rather than relying only on East Pye Solar's summaries.	The Applicant notes this comment.

2.23 Peter Chapman

Table 2.23 Applicant's Response to Peter Chapman [REP1-321]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PC-001	Design Principles	I live directly opposite a field in which panels are due to be sited - Low Farm, Saxlingham Nethergate. I want to reemphasise the comments I have made in previous submissions to Island Green Power to which unfortunately I have not always received a response other than a simple holding email. I accept that solar "farms" need to be part of the country's energy generation in the future BUT this needs to be done in a way which is sensitive to the local communities in which they are sited. The lack of any satisfactory response to previous concerns raised leads me to believe that the developers and funders of this project are not concerned about this. I want to emphasise again 4 points: 1. PROXIMITY OF PANELS TO HOUSES. It is unclear how close to properties the actual panels will be placed. Maps seem to suggest a buffer of 100-150m but I'm told they will be 50m away - so the maps are incorrect. This is too close. In order to make this tolerable then a buffer of 150-200m	The Applicant refers to its response in SCH-017, SCH-014 and SCH-023 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** in relation to the proximity of the panels to the properties. The Applicant notes that the most recent correspondence from Mr Chapman were responded to in April/May of this year for arranging access to his pond for great crested newt surveys. The Applicant welcomes further engagement with Mr Chapman if he has any questions or comments about this. The Applicant considered Mr Chapman's comments on the Targeted Consultation alongside wider consultation feedback, presented in **Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-034]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		between actual panels and residential properties is needed.	
WR-PC-002	Noise and Vibration	2. NOISE. The one reply I did get from Island Green Power in relation to a point I made about construction noise was that they did not think it would be a problem and that no mitigation was necessary. I observed the nearby solar farm in Swardeston being constructed and the incessant pile driving for months was clearly a serious problem. This will be very difficult for me and my disabled wife living so close to a field where this will occur. Some mitigation is required.	The Applicant notes this comment and refers to its response under WR-NOI-002 in Table 3.22 regarding noise impacts.
WR-PC-003	Transport and Access	3. TRAFFIC DISRUPTION. The proposed route for heavy traffic through Saxlingham Nethergate on a minor road, close to old buildings and with sharp bends is simply unsuitable and will cause damage to local buildings etc. A lot of heavy traffic will also impede emergency vehicles attending the village.	The Applicant notes this comment and refers to its response under WR-TRA-014 in Table 3.17 regarding the AIL routing through Saxlingham Nethergate.
WR-PC-004	Ecology and Biodiversity	4. IMPROVING BIODIVERSITY. The bland reply that the developer is committed to a 10% biodiversity increase is meaningless. The fields to be used are agricultural for crops and not therefore managed for wildlife. One way off offsetting the impact should be to properly commit the developers	Whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has committed to providing a minimum of 10% BNG. A detailed approach is provided within the **Biodiversity Net Gain Report [APP-218]** which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values

ID	Theme	Comments/Issues Raised	Applicant's Response
		to manage the solar fields for wildlife e.g. sewing wildflowers, grazing, creating good wildlife corridors.	and post-construction values are calculated and provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. Habitat creation, enhancement, management and monitoring are set out in the **Outline LEMP [REP1-064]** and secured through the DCO. 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 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.

2.24 Philip Bolus

Table 2.24 Applicant's Response to Philip Bolus [REP1-255]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PB-001	Cultural Heritage	The sheer scale of the East Pye Solar Project poses a direct threat to the rural setting of South Norfolk's most sensitive heritage and natural assets. We live in **[REDACTED]** Nethergate a grade II* early 1600`s timber framed Jacobean house with its origins going back to the 13th century. In the listing it is stated that the house: "This timber framed mansion is built on a 13th century moated site and is one of the oldest mansion houses in England". "It is reputed that the manor was settled on Anne of Cleeves as part of her divorce settlement from Henry VIII". "still contains original diamond mullion windows". Please also note that the remains of the moat run parallel to the road opposite the school less than 2 feet from the edge of the road & some 2 to 3 feet below the level of the road. This is not just a drainage ditch but a part of the ancient moat. Grade II* & Grade I listed buildings represent the most exceptional historical fabric in the country. Indeed, Grade II* historic building make up less than 5.5% of all the buildings in England. They derive their legal significance not just from	The Applicant notes these comments and refers to the following responses in Section 3 of this document: • WR-CUL-002 in Table 3.15 relating to listed buildings had not been considered in the Heritage Impact Assessment; and • WR-CUL-006 in Table 3.15 relating to impacts to local conservation areas in potential impacts to Brooke and Kirstead, Saxlingham Green, Saxlingham Nethergate and Fritton.

ID	Theme	Comments/Issues Raised	Applicant's Response
		their physical infrastructure but also from the centuries old agricultural landscapes that frame them. National Planning Policy Framework – NPPF – demands that substantial weight be given to an assets conservation & furthermore states that the asset is not just the actual building but is the area that supports it. Surrounding these irreplaceable assets and our conservation village with security fences, CCTV & vast tracts of dark glass solar panels completely destroys their historic curtilage. Green energy should not come at the cost of erasing irreplaceable cultural history. The public benefit of the scheme should not outweigh the permanent severe detriment to the landscape & core identity of the conservation villages that we all call home. East Pye condemns the very future of these irreplaceable heritage assets as nobody will chose to live & invest in such a home when surrounded by thousands of acres of industrialized solar power station rather than enjoying its natural habitat. We, the owners of a Grade II* manor house, are merely the custodians of these buildings for future generations & it takes a specific kind of "lunatic" to take on the financial & logistical burden associated with the maintenance of such a heritage site.	

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PB-002	Socio-Economics	It was the calm & tranquillity of the area that drew us here in the first place just over three years ago. Indeed, had we known of this project prior to purchasing **[REDACTED]** in July 2023 we would never have bought the **[REDACTED]** and would have looked elsewhere! As with most people our home is our greatest tangible asset be it to leave to our children or to sell to pay for our care in our dotage. As yet there has been absolutely no mention of any regard or compensation for local residents to counter the depreciation of the values of their homes or indeed if they are rendered wholly unsaleable. Our very livelihood & future is at stake here and this indeed needs to be urgently addressed & compensation agreed. It is not just if East Pye Solar is greenlighted that affects us but it is the threat of East Pye that already affects us & hundreds of others who call these villages home. House values have already fallen considerably & indeed there are many who are finding that there are no interested parties for their homes that are on the market now. Our home is I have to say more unique & will be more affected as it is a miniscule percentage of the public who want to take on such a challenging home.	The Applicant notes this comment and refers to its response under WR-SOC-001 in Table 3.19 regarding property values.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PB-003	Cultural Heritage	It is curious & more than galling to be told that we cannot put solar panels on our outbuildings as this would be wholly inappropriate to the heritage setting of the **[REDACTED]** – However, we are here today entertaining the possibility of surrounding these assets further protected in conservation areas with thousands of acres of solar panels. The proposal that the AIL access route come through Saxlingham Nethergate is wholly inappropriate, irresponsible and demonstrates a callous disregard for the community & its residents. The village street is totally inadequate for such traffic. Saxlingham Nethergate, a Conservation Area, a has a very high percentage of heritage buildings - 42 Grade II, Grade II* & Grade I to be exact of which 38 are private homes. The road is not built to support such weight & frequency of traffic neither is it wide enough. Sacrificing the unique character of Norfolk's historic villages means losing a finite, non-renewable cultural resource that, once industrialized, can never truly be restored to its natural state	The Applicant notes this comment and refers to its response under WR-TRA-014 in Table 3.17 regarding the AIL routing through Saxlingham Nethergate. The Applicant cannot comment on rooftop solar installations for individual properties in a heritage setting as East Pye Solar is a ground mounted solar Scheme.

2.25 Professor Anne Marie Minihane

Table 2.25 Applicant's Response to Professor Anne Marie Minihane [REP1-397]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PAMM-001	Soils and Agriculture	We import about 45-50% of our food in the UK El-Nino and UK food supply , UK Food Security Report 2021, including 85% of our fruit, which is a very precarious position to be in given the current global geopolitical landscape and rapidly declining climatic conditions which are less conducive to food production. Food insecurity at the household level is the limited or uncertain ability to acquire enough nutritious food for an active, healthy life. It spans a spectrum from anxiety about affording food, through reduced diet quality and disrupted eating patterns, to outright hunger. In 2026 in the UK food insecurity affects millions of households (1/8) and disproportionately impacts families with children (1/6), single parents, disabled households, and those on low incomes Food Foundation Food Insecurity; House of Commons Food Poverty; Joseph Rowntree People in the most deprived communities can expect to live up to 20 fewer healthy years (healthy life expectancy 69y vs 49y) compared to	The Applicant notes this comment and refers to its response under WR-SOI-002 in Table 3.20 regarding food security.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the wealthiest, which is in significant part due to lack of access to and affordability of nutritious food Kings Fund: Health-inequalities-nutshell. In children poor nutrition leads to impaired cognitive and behavioural development, stunted growth, impact on bone and dental health, weakened immune system, and impacts on health right throughout life, affects which cannot be fully reversed by consuming a healthy diet later in life. These disparities are being made worse by recent food inflation due to global energy and food production and supply 'events'. UK food prices rose by 39% between November 2020 and November 2025 Food Inflation: House of Commons Library, which is about double the UK salary increase and social security benefit rises in the same time frame. As a result food is getting more unaffordable. As a nation we desperately need to prioritise local and national food production and food supply. The UKs Joint Intelligence Committee report (Foreign Office, Home Office, Ministry of Defence, M15, M16 and GCHQ) published in Jan 2026, entitled Global Biodiversity Loss, Ecosystem Collapse and National Security, stated that 'Food supply is identified as the UKs single greatest	

ID	Theme	Comments/Issues Raised	Applicant's Response
		vulnerability' Norfolk in the top 3 counties in the UK for food production. The 20,000 areas of so of prime farm land around Norfolk which is being considered for solar energy would produce about 3.2 terawatts per year, which equates to 1% of our national electricity needs in the UK. Although difficult to fully establish food production rates, it is estimated that the same land would produce 2.5 billion portions of fruits and vegetables, which equates to 3% of our national annual consumption and enough to provide the recommended intake of fruits and vegetables of 5 portions a day for 1.4 million people. In 2024, the then Environment secretary, Steve Barcaly in a solar versus food security analysis, stated that the 'The best agricultural land should be prioritised for food production' and that 'Solar farms should not normally displace the UKs highest quality food-producing land… when lower value land and non-agricultural sites are available In my opinion we should not be decommissioning even one acre of prime land, as is being proposed for the East Pye Solar Farm, if it can possibly be avoided.	

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-PAMM-002	Transport and Access	Personally, we live directly on the proposed transport route in the centre of Saxlingham Nethergate and are devastated and petrified by what is being proposed. Almost all of our house is within one metre of the narrow road (not A or B road) at the bottom of Church Hill on the corner (see attached photo). The disruptions to our lives (and potential damage to our house) will be enormous and we are petrified that something will go wrong with one of these 200,000 ton AIL coming around the corner with 1 metre of our bedroom and we will be taken out in the middle of the night. Furthermore the payment along Church Hill which links the heart of the village to all the amenities like the primary school, church, playing fields, scout hut and allotments will need to be taken out to make the road wide enough for the AILs, which means the children and all of us will need to walk on the road, which is lethal. Therefore from a national and Saxlingham Nethergate welfare point of view the proposed solar farm and transport routes are not justified in my opinion.	The Applicant notes this comment and refers to its response under WR-TRA-014 in Table 3.17 regarding the AIL routing through Saxlingham Nethergate.

2.26 Rachel Andrews

Applicant's Note: The Written Representation includes a footpath map and seven supporting photographs showing the route, surrounding landscape and views referred to below. These have not been reproduced in this table; please refer to [REP1-456] for the supporting material in full.

Table 2.26 Applicant's Response to Rachel Andrews [REP1-456]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-RA-001	Transport and Access	Please see the Footpath Map which shows the only footpath accessible from my home, **[REDACTED]**, along the B1527, which is the Morningthorpe FP5, which runs in-between the proposed Site 5 for the EPS development. This footpath links us to all the other footpaths in the surrounding areas and every day I walk my dog along Morningthorpe FP5 to St. Catherine's Church in Fritto. Currently I walk along footpaths that are open fields, with beautiful views. I work from home for an online company, so taking a daily walk in the countryside, which is an important part of my daily routine, giving me time to reflect and feel the beauty of the nature and landscape around me, which supports my mental and physical health, and emotional wellbeing.	The Applicant notes this comment and refers to its response regarding the potential impacts and mitigation measures for PRoW and footpaths under WR-REC-001 in Table 3.16. The Applicant recognises the importance of walking, outdoor recreation and access to nature for physical and mental wellbeing and acknowledges the particular importance placed by the resident on the daily use of Morningthorpe FP5. The Human Health Summary Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** considers access to recreational routes, opportunities for physical activity, landscape and visual amenity and connection to nature as relevant health and wellbeing pathways. The **Equality Impact Assessment [APP-214]** similarly considers access to nature, visual amenity and attachment to place in relation to mental wellbeing. The Applicant acknowledges that maintaining access to a PRoW is not necessarily the same as maintaining its existing character or recreational experience and that individuals may experience changes to familiar walking routes differently.

ID	Theme	Comments/Issues Raised	Applicant's Response
			However, taking account of the proposed PRoW management and mitigation measures (see **Outline PRoWPPMP [APP-203**]), the assessments do not identify a likely significant adverse population-level health effect. The Mental Health and Wellbeing Addendum **[REP1-107]** prepared by the Applicant, provides further consideration of the evidence and representations submitted during the Examination in relation to potential mental health and wellbeing effects. The Addendum consolidates and provides further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. The Applicant recognises the seriousness of the experiences reported by individual residents. These accounts have been considered as relevant qualitative evidence **in** the **Mental Health and Wellbeing Addendum [REP1-107] (**see the Applicant's response to ISH1 Action Point 44), alongside the environmental assessment, consultation evidence and available population-health information. The population-level nature of the assessment does not seek to discount or diminish individual experiences of concern or distress. This distinction is consistent with the approach taken elsewhere in the Applicant's Examination responses. Having considered this additional evidence, the Addendum does not alter the overall conclusion of the Human Health Summary Statement that the Scheme is not expected to result in likely significant adverse effects on population and human health.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-RA-002	Transport and Access	Should the proposed development go ahead, I will no longer be able to access this footpath, or go for walks from my home. We have maintained and mowed the nettles and grass along road and on the verge from our property, **[REDACTED]**, to the start of the footpath, which allows us to walk along the verge safely. The B1527 is a national speed limit road, with cars travelling very fast, at 60mph+ so redirecting this footpath during proposed construction along the road would be extremely dangerous, with many blind bends and cars travelling at very fast speeds.	The Applicant refers to its response under WR-REC-004 in Table 3.16 regarding diversions and temporary closures of PRoW.
WR-RA-003	Recreation and Public Rights of Way	Photos 1-7 show the views from my home and the views from my walk, with a very old Oak tree along the way. With the open views, the ability to see wild animals in their natural habitat is one of the simple joys from this daily activity that provides much upliftment and enjoyment to my life. Without this footpath, I won't be able to access the countryside from foot, from my home. I will need to drive in order to go for a walk, and would need to drive a considerable distance in order to find	The Applicant refers to its response under WR-REC-001 in Table 3.16 regarding the visual impact to PRoWs, public paths and other recreational routes.

ID	Theme	Comments/Issues Raised	Applicant's Response
		land that's not covered in solar panels, should this development go ahead.	
WR-RA-004	Landscape and Visual	I have no interest in walking along highly fenced, CCTV monitored walkways with solar panels on either side. The feeling of entrapment from being fenced in, the fear of not being able to escape should I need to as a solo female walking these footpaths is high and would stop me from continuing to access the countryside, which after having enjoyed walks from my home, my whole life, this feels like a lot to lose. I walk from my home in Morningthorpe to St Catherine's Church every day, and walk along the gravestones in the church as part of my [REDACTED] this helps me to reduce stress and tension and helps me to unwind each day. This will no longer be possible should this development go ahead. This footpath also allows me to connect with other footpaths in Shelton and Fritton for longer weekend walks, again, I will not be able to access these or enjoy the local countryside if solar panels and substations are built on the land either side of the footpath.	The Applicant refers to its response regarding the visual impact of fencing, CCTV and solar PV panels under WR-LAN-002 in Table 3.10. Furthermore, the Applicant refers to its response regarding the landscape impacts to paths and PRoWs under WR-REC-002 in Table 3.16.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-RA-006	Transport and Access	My home is opposite the proposed substation at Site 5. The continuous sound and light pollution from this will affect greatly the bat population who fly around at dusk. It bothers me hugely that there are so many industrialised areas that could be used for solar panels or the rooves of our homes, and it's a travesty that the beautiful Great British Countryside is being considered a suitable place for solar industrialisation.	The Applicant refers to its response regarding light pollution under responses: • WR-LIG-001 in Table 3.11 regarding the impact of light pollution; and • WR- NOI-004 in Table 3.22 regarding noise from Substations.

2.27 Robert James Hazell

Table 2.27 Applicant's Response to Robert James Hazell [REP1-300]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-RJH-001	Transport and Access	I ask the Examining Authority to recommend that **[REDACTED]** abnormal indivisible load (AIL) route. I am the owner of **[REDACTED]** on **[REDACTED]** Saxlingham Nethergate, be removed from the proposed l and a member of Block East Pye Solar. My concern is direct: the proposed route passes immediately beside my historic listed home, through a narrow village road with listed buildings, the War Memorial and pedestrian routes. I attach photographs showing **[REDACTED]** abutting the road. These demonstrate the close relationship between the highway and the building. I ask the Authority to consider these photographs alongside my request for an accompanied site visit. 2. **[REDACTED]** is an early sixteenth-century, Grade II listed thatched cottage within the Saxlingham Nethergate Conservation Area. Its historic construction includes timber framing, clay lump and wattle and daub. Its gable end immediately adjoins	The Applicant notes these comments and refers to its responses to Mr Hazel's oral submission at **Open Floor Hearing 1, which is provided in Written Summar of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		[REDACTED]. This is a sensitive historic building directly beside the proposed route. The photographs show why a general description of the road is insufficient. The Authority needs to understand the actual space available and how closely abnormal loads and any associated highway works would approach the cottage. My concerns include excavation, vibration, construction activity and the movement of large vehicles beside historic fabric. I do not claim that damage is certain. I object to exposing the cottage and this constrained historic road to these activities without a clear demonstration that the route is appropriate suitability must be considered as a whole. The narrow road, cottage frontage, other historic buildings, listed retaining wall, War Memorial and pedestrian environment all form part of the same constrained corridor. My request is not simply for more explanation of how abnormal loads might pass. It is that **[REDACTED]** should be removed from the AIL route and that a suitable alternative should be identified and assessed by the Applicant. The Applicant should not rely on later traffic management arrangements to answer the basic question of whether this route is suitable. That question needs to be addressed during the	

ID	Theme	Comments/Issues Raised	Applicant's Response
		examination, with the relationship between vehicles, proposed works, buildings and pedestrians clearly shown. The Applicant should provide dimensioned plans showing the proposed vehicle swept paths, widening footprint and closest distances to **[REDACTED]** and other sensitive features. If these matters remain unresolved, that uncertainty should weigh against retaining **[REDACTED]** as the proposed route.	
WR-RJH-002	Transport and Access	My objection also concerns the setting of the War Memorial, the Old Rectory's listed retaining wall, the conservation area and the route used by pedestrians and people travelling to school. The proposed temporary removal of the pathway alongside the War Memorial is a particular concern. Removing this route would force children directly onto the highway to access the primary school. This creates an unacceptable conflict between children walking to school and vehicle movements through **[REDACTED],** and is a further reason why **[REDACTED]** should be removed from the AIL route. These features cannot be considered separately from the road. Accommodating abnormal loads and associated works could affect the space around them and the character of this historic village corridor. Any statement that land rights over the War	The Applicant notes these comments and refers to its responses to Mr Hazel's oral submission at **Open Floor Hearing 1, which is provided in Written Summar of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Memorial itself are unnecessary does not answer concerns about nearby works, its setting or the surrounding pedestrian space. The Authority should examine the full relationship between the proposed route and these features.	

2.28 Stuart Gooderham

Table 2.28 Applicant's Response to Stuart Gooderham [REP1-332]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SG-001	Socio-Economics	Director of Goodies Farm Shop and resident at French's Farm French's Farm, Wood Lane, Pulham Market, South Norfolk, IP21 4XU I object to the proposed construction compound and cable works near my home at French's Farm and Goodies Farm Shop because of their potential impact on our living conditions, business and access.	The Applicant notes this comment and refers to its response under WR-SOC-002 in Table 3.19 regarding impacts to local businesses.
WR-SG-002	Scheme Description	**Impact on my home** I have been advised that a construction compound of approximately 13 acres could be situated immediately outside my home for around two years. I am concerned about prolonged noise, dust, lighting and heavy vehicle movements affecting my home and garden. Please confirm the compound's exact location, size, duration and working hours, explain why this location was selected, and demonstrate that alternatives further from occupied homes have been considered.	The Applicant notes this comments and refers to WR-C&D-008 in Table 3.17 regarding mitigation measures for temporary construction compounds.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SG-003	Socio-Economics	**Impact on Goodies Farm Shop and staff** Goodies is heavily dependent on passing trade from the A140. During disruption associated with construction of the Long Stratton bypass and the works at Swainsthorpe, we recorded sales declines of over 25%, placing enormous financial pressure on the company. The 2025 Swainsthorpe disruption was associated with electricity cabling works on the A140 for EDF's Bloy's Grove solar project.	The Applicant notes this comment and refers to its response under WR-SOC-002 in Table 3.19 regarding impacts to local businesses. The Applicant notes the proximity of Goodies Farm Shop to the Order Limits. As noted in our response regarding impacts to local businesses, there is the potential for business to benefit from expenditure by the construction workforce, as well as experiencing disruption related to construction activities. These impacts are most likely to occur nearest to construction sites.
WR-SG-004	Transport and Access	Further congestion, closures or diversions could deter customers, reduce passing trade, delay deliveries and disrupt staff travelling to and from work. Keeping our entrance open would not, by itself, protect the business from these effects.	The Applicant notes this comment and refers to its response under WR-TRA-009 regarding traffic congestion.
WR-SG-005	Socio-Economics Transport and Access Cable Route Corridor	Please assess these impacts specifically for Goodies, including the combined effects of compound traffic, cable installation beneath the A140 and any other planned roadworks, closures or diversions in the surrounding area. This should cover customer journeys, staff commuting and delivery routes. We can provide supporting sales information	The Applicant notes this comment and refers to its response under WR-SOC-002 in Table 3.19 regarding impacts to local businesses.
WR-SG-006	Transport and Access	**Information and safeguards required** I request:	The Applicant notes this comment and refers to the following responses in Section 3 of this document:

ID	Theme	Comments/Issues Raised	Applicant's Response
	Noise and Vibration Air Quality Socio-Economics Construction and Decommissioning	• Details of the A140 crossing method, programme, traffic restrictions and arrangements if works overrun. • Construction traffic routes, expected vehicle numbers and measures to protect customer, staff and delivery access. • Coordination with Norfolk County Council and other works promoters to avoid overlapping road disruption and minimise the combined impact on trade and access. • Enforceable controls on working hours, noise, dust and lighting. • Advance notice of disruption, clear access signage and a named contact to resolve problems promptly.	• WR-TRA-018 regarding the potential impact to the A140. • WR-TRA-002 regarding construction traffic routes, expected movements and mitigation measures. • WR-NOI-001 and WR-NOI-002 regarding noise mitigation measures during construction and operation. • WR-AIR-001 regarding air quality mitigation measures during construction. • WR-LIG-001 regarding light pollution. WR-C&D-002 regarding construction mitigation measures. Mitigation and management measures are secured through the **Outline CEMP [REP1-058]**, **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203]**, addressing matters including construction traffic, noise, dust, environmental effects and access. Detailed management plans will be submitted to and approved by the relevant planning authority in accordance with the **Draft DCO [REP1-018].**
WR-SG-007	Ecology and Biodiversity	Our June 2026 Preliminary Ecological Appraisal also records nesting birds and identifies the need to control lighting near trees potentially used by bats. Please confirm that any relevant effects of East Pye's nearby works have been assessed.	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-C&D-008 regarding the location of temporary construction compounds.

ID	Theme	Comments/Issues Raised	Applicant's Response
		I ask that these concerns are addressed before consent is granted and that alternative compound locations and measures to minimise road disruption are fully examined.	• WR-ECO-004 regarding the impact and proposed mitigation for birds. • WR-ECO-005 regarding the impact and proposed mitigation for bats. • WR-LIG-001 regarding light pollution.

2.29 Stephen Paul Leate

Table 2.29 Applicant's Response to Stephen Paul Leate [REP1-314]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPL-001	Need	I totally disagree with the East Pye Solar Farm application. Below are some of my reasons. 1. The area is already oversubscribed with solar and battery storage developments with regional transmission solar capacity targets already being met - there is no benefit to the local community. The Applicant's own Statement of Need accepts that prioritised schemes already meet the relevant Clean Power 2030 regional solar capacity ranges for 2031-5 therefore East Pye Solar is not specifically needed in this location or region to meet stipulated targets.	The Applicant notes this comment and refers to its response regarding energy need and solar capacity targets outlined under comment WR-NEE-005 in Table 3.4.
WR-SPL-002	Transport and Access	2. Construction Traffic/AIL routing will cause a great deal of damage to Saxlingham Nethergate conservation village features and the footings of a number of the village properties due to the weight of the AILs. Heritage and landscape Site 7 is so large that the settings of multiple Grade II* & Grade II Listed Building and conservation areas are impacted. This area is of national importance for its quantity and quality of pre-1750 rural architecture – over 300 Listed Buildings are in the zone of influence. This scheme would industrialise a rare rural historic	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-CUL-009 Table 3.15 for potential impact of construction traffic on heritage assets. • WR-CUL-012 in Table 3.15 for impact of construction traffic and vibration on heritage assets; and • WR-TRA-028 in Table 3.17 regarding construction traffic on routes such as Church Hill and The Krons.

ID	Theme	Comments/Issues Raised	Applicant's Response
		landscape of high sensitivity - definitely the wrong place for a scheme of this scale. 3. The weight of AILs are also likely to damage some of the underground pipes that take water from higher up the village. The sewer that runs under the road is asbestos which is likely to crack causing asbestos & sewage to leak into the ground. 4. AILs are proposed to be routed along our road (Church Hill) – this road is nowhere near wide enough and we already experience daily problems with the road being unable to accommodate two-way traffic. The local school is in Church Hill and the children access the school via a footpath that runs alongside the road. Heavy goods lorries will also create not only congestion in this conservation village but will also risk the safety of car drivers and school children. I don't believe that anyone has visited Saxlingham Nethergate and undertaken a thorough assessment of the village as a potential AIL/HGV route and I believe that any assessment is likely to have been a desktop exercise. Anyone visiting would immediately see that AILs are far wider than the road in places.	
WR-SPL-003	ECO-1	5. Despite proposals for road widening and haul roads, no botanical survey has been carried out. A level 6 botanist familiar with the botanical	The Applicant notes this comment and refers to its response under WR-ARB-002 in Table 3.13 regarding botanical surveys.

ID	Theme	Comments/Issues Raised	Applicant's Response
		record has written to East Pye Solar stating that full season botany surveys must be carried out before the project progresses further.	
WR-SPL-004	ECO-1	6. Ecology - barbastelle bats This is a nationally important bat landscape, with barbastelle activity recorded across the entire scheme area. Multiple maternity colony core sustenance zones overlap the entire site and cable corridor. Barbastelles depend on connected dark landscapes and functional commuting and foraging habitat that cannot simply be recreated elsewhere.	The Applicant notes this comment and refers to its response under WR-ECO-005 in Table 3.12 regarding bats.
WR-SPL-005	ECO-1	7. Ecology – White Clawed Crayfish Site 7 is directly hydrologically connected to the Tas and it is proposed to drill under the Tas to link sites 5 and 7. Norfolk Rivers Trust has survey results recording a breeding colony of White Clawed Crayfish in the Tas. East Pye Solar's aquatic surveys were carried out when streams and ditches were dry, which is unacceptable given that this is a Chalk Stream Catchment known to be a habitat of White Clawed Crayfish.	The Applicant notes this comment and refers to its response under WR-ECO-009 in Table 3.12 regarding white clawed crayfish.
WR-SPL-006	Water Environment	8. Water environment Site 7 sits in a highly sensitive chalk-stream (Tas)and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas, private sewerage and vulnerable water receptors surrounding the scheme. Impacts on private sewerage and hydrological connectivity have	The Applicant notes this comment and refers to its response under • WR-GRO-004 in Table 3.21 relating to private sewerage. • WR-WAT-002 and WR-WAT-022 of Table 3.14 relating to the River Tas.

ID	Theme	Comments/Issues Raised	Applicant's Response
		not been assessed at all. This project poses a significant risk to public health and ecology and insufficient modelling has been done to ascertain true impacts.	
WR-SPL-007	Transport and Access	9. Our ancient public footpaths & walkways will become fenced in becoming more like a prison exercise yard rather than the rural countryside as they are today. The proposed huge/industrial type screening will adversely affect both the unique countryside character and the wide variety of wildlife that we are privileged to have in our area.	The Applicant notes this comment and refers to its response regarding recreation and public rights of way under WR-REC-001 and WR-REC-002 in Table 3.16.
WR-SPL-008	Ecology and Biodiversity	10. Wildlife Mitigation - with regard to the areas included in East Pye's proposal we all know that we can never re-create the spectacular countryside, habitat and wildlife we currently have therefore the impact on wildlife should be mitigated as far as possible by thoroughly assessing and documenting mitigation actions within the planning, implementation, maintenance and decommissioning plans. I have severe worries regarding the lack of wildlife mitigation activities taking place. Ross Joliffe at the Issue Specific Hearing 1 – Part 4 (video timing 46.38-49.45), outlined his concerns which totally echo mine in that when a project such as this is started you have to have a strategy that acknowledges the fact that having high fences (2.4 metre deer fencing, 3 metre industrial-type fencing) cordoning off	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-ECO-001 in relating to concerns about the Scheme's impact on the local environment, wildlife, biodiversity and ecology. • WR-ECO-015 comments noted the impact of site fencing on wildlife movement, breeding habits and established wildlife corridors. The Applicant acknowledges the importance of local ecological expertise and has engaged with Norfolk Wildlife Trust throughout the development of the Scheme.

ID	Theme	Comments/Issues Raised	Applicant's Response
		equipment blocks, solar arrays, site compounds (lifetime being c2 years) the planned mitigation seems to be that when everything is working hedgerows will be put in, etc. This lack of planning/mitigation at the outset is definitely going to adversely affect the abundance of wildlife in the area covered by the East Pye Solar Plan. The Norfolk Wildlife Trust recommended a document in their relevant representation, but this seems to have been dismissed as the Applicant stated that guidance has been carried out by the relevant statutory nature conservation body, Natural England, which reports that there is no conclusion of likely significant affect. In my view the Norfolk Wildlife Trust should be listened to because of their in-depth/broad local wildlife knowledge. I would urge the Planning Inspectorate to assess Norfolk Wildlife Trust's submitted documentation.	The Applicant has not dismissed Norfolk Wildlife Trust's representations, and these matters continue to be recorded and discussed through the **Statement of Common Ground with Norfolk Wildlife Trust [REP1-088]**, where a number of ecological issues remain under discussion. Norfolk Wildlife Trust's examination advice includes matters relating to commuting corridors, habitat functionality, lighting controls and the enforceability of mitigation commitments, all of which are being actively considered through the Examination process. The Applicant's position is that the Scheme has been developed using an environmentally led design approach, with ecology and biodiversity embedded within the design evolution, design buffers and mitigation strategy. The mitigation hierarchy has been applied throughout the design process.
WR-SPL-009	Lighting	11. Night lighting was also raised separately as an issue at the hearings, highlighting that the area does not currently have any night lights and the impact of lighting for some wildlife would be severe. The Applicant's view was that no adverse lighting would be installed. However, they failed to give details of the lighting that was proposed to understand their view of adverse lighting.	The Applicant notes this comment and refers to its response to WR-LIG-001 and WR-LIG-002 in Table 3.11.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SPL-010	Aviation	12. Safety - I have outlined many of my issues in previous documents submitted in the past but an additional aspect of safety relating to East Pye's plans was evidenced when the Tibenham Airfield was discussed which outlined that East Pye were proposing to have solar panels installed on the emergency run off area at the airfield!	The Applicant notes this comment and refers to its response under WR-AVI-001 in Table 3.28 regarding the impact to Tibenham Airfield. The Applicant has engaged with Norfolk Gliding Club to understand operations at Tibenham Airfield and inform its aviation assessments. Discussions continue through a Statement of Common Ground that records both areas of agreement and matters remaining under discussion. An updated SoCG will be submitted at Deadline 3 which will outline engagement and matters still to be resolved.
WR-SPL-011	Applicant	13. The Macquarie Group, the owners of East Pye previously owned Thames Water where their track record shows that they preferred to break the law & pay fines rather than fix the environmental damage they were causing. They have proved that they cannot be trusted to abide by commitments & legislation.	The Applicant has demonstrated the Scheme's compliance with all relevant legislation and the Applicant is subject to legally binding DCO Requirements. The Applicant refers to its response regarding the Macquarie Group under WR-APL-003 in Table 3.3.
WR-SPL-012	Construction and Decommissioning	14. Decommissioning – I am very concerned that should the removal of the proposed solar infrastructure be necessary over time the land will not be restored adequately. In conclusion, the applicant has not shown that this harmful scheme is necessary, fairly consulted on, or environmentally acceptable in this location	The Applicant notes this comment and refers to its response regarding decommissioning under WR-CD-005 in Table 3.7.

2.30 Suzanne Clarke

2.2.2 The Applicant notes that this Written Representation [REP1-163] contains scanned written submissions from neighbours of the Interested Party. The Applicant refers these residents to previous responses on transport and access in PDA-012.

2.2.3 The Applicant has endeavoured to respond to the Interested Party's submission, however, given the level of redaction, some areas cannot be addressed at this stage.

Table 2.30 Applicant's Response to Suzanne Clarke [REP1-163]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-SC-001	Landscape and Visual Recreation and Public Rights of Way Scheme Description	BRIDLEWAY NO. 9, Tivetshall st Margaret also called Prangle Lane situated off Lodge Road. Site 2A. For the last two years | have been trying to get the panels moved back from the bridlepath without success. Even a request from our MP was not successful. The applicant claims a large hedge as part of the margin. The hedge is on the west side of Prangle Lane, and their site ends when it meets the East side of Prangle Lane. See LAND REGISTRY NK 498174 and NK 498175. Therefore, there is nothing substantial to shield the horses from the panels. The panels are almost 15 foot high. They move to face the sun, make noises, glint and glare. Without a substantial margin of hedges, trees, et cetera the bridlepath will be unsafe for horse riders. The British Horse Society has not assessed these new large moving panels only shorter	The Applicant notes this comment and refers to its response to Ms Clarke's oral submission at Open Floor Hearing 1, which can be found under SC-002 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		fixed panels. So, my request would be to create a margin of at least 30 metres especially at the commencement of the build when the plants will not have grown. A spooked horse could run straight onto the road. A margin of 30 metres will give the horse a better chance of assessing the situation and the rider a chance to turn their horse and get it under control. The field is so vast it could accommodate a generous margin.	
WR-SC-002	Recreation and Public Rights of Way	RESTRICTED BYWAY NUMBER6 TIVETSHALL. Works plan AS- 0038. I believe this is shown to be closed for construction and used during operation. This further limits off road riding and will have similar problems when in use. The path leads to miles of off road riding right through to Long Stratton. Something that will be sorely missed if vehicles are allowed to use it permanently or for construction. The Norfolk CC's submission is that the access should run from 2A through CRC3 into 2B. 2B is bisected by Byway6 so only a Haul crossing route would be necessary on byway6 ,to access the rest of 2B and then a Haul crossing to CRCZ2. All referred to by the Norfolk County Council submission.	The Applicant notes this comment and refers to its response to Ms Clarke's oral submission at Open Floor Hearing 1, which can be found under SC-002 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**. The Applicant acknowledges the concerns raised regarding Public Rights of Way including Tivetshall St Margaret RB6. An **Outline PRoWPPMP [APP-203]** has also been prepared to provide a framework for the management of Public Rights of Way, promoted walking routes and permissive paths throughout the construction, operational and decommissioning phases of the Scheme. The final PRoWPPMP, secured through the DCO requirements, would set out the detailed measures for the management of Public Rights of Way, promoted

ID	Theme	Comments/Issues Raised	Applicant's Response
		I see now reason that it is necessary to either close or use byway 6 apart from creating a crossing. It is used continuously by walkers, equestrians and cyclists and facilities long safe off-road routes the loss of which would be major for this area.	walking routes and permissive paths. The Applicant will seek to keep PRoWs such as RB6 open during construction if possible, subject to detailed design once a Principal Contractor is appointed. These measures would be required to be clear, enforceable and effective in maintaining access to, and the safe operation of, the Public Rights of Way network throughout the lifetime of the Scheme.
WR-SC-003	Recreation and Public Rights of Way	Equally the same will apply to Great Moulton path number 19 known as HUNDRED LANE. This would be sorely missed as well.	The Applicant notes this comment and refers to its response to Adrian Ramsay MP's oral submission at Open Floor Hearing 1 under comment AR-004 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.
WR-SC-004	Transport and Access	Furthermore, the Applicants proposal to use Lodge Road for their construction and operational traffic would put the final nail in the coffin for horse riders. It would appear that the applicant has put in the application before making the proper and adequate arrangements. They have not consulted our parish council where something as important as this would have been discussed with residents and given the council the opportunity to put these concerns to the applicant before submission, request that a proper assessment of the bridlepaths and Lodge road, are made with the safety of the horse	The Applicant notes this comment and refers to its response to Ms Clarke's oral submission at Open Floor Hearing 1, which can be found under SC-001 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and rider and other users, of paramount consideration.	
WR-SC-005	Consultation and Engagement	Furthermore, this process has been so difficult, the method of registering and the vast amount to navigate that makes it impossible to find all the information one needs. It is only available online and a large proportion of residents have not got the skills to navigate it, including myself and husband, so hope you can be tolerant of our attempts at making the submissions to you.	The Applicant notes this comment and refers to its response regarding navigating DCO documents under comment WR-CON-002 in Table 3.2.
WR-SC-006	Recreation and Public Rights of Way	I enclose a map for reference[2] as well as photographs[3] of bridlepath No 9 showing the vast area that would be covered with panels 15 foot high and security fencing. Bridlepath path No 10 shows the pleasant, grassed track that is very special with an abundance of wildflowers in spring and summer	The Applicant has viewed the images and makes notes of comment.
WR-SC-007	Consultation and Engagement	I am speaking on behalf of [redacted] has lived in [redacted] since he was six months old. He is now [redacted]. The cottage is opposite the access from B1134 to the substation and BESS etc. A lovely close knit family [redacted] mother died 11 years ago his father just three years	The Applicant acknowledges the concerns raised by the respondent and the interested party they are speaking on behalf of. The Applicant is unable to verify the details of the land interest concerned. However, information relating to land ownership is obtained from HM Land Registry

[2] Available to view on page 4 of [REP1-163]
[3] Available to view on pages 5-6 of [REP1-163]

ID	Theme	Comments/Issues Raised	Applicant's Response
		ago. For the last 18 months or more [redacted] has been bombarded with letters from East Pye Solar which have given him great distress as they have been addressed to either his mother, his father, executors or himself even receiving more than 10 in one post. At one of the East Pye consultations, with help [redacted] complained to a representative of EPS and they promised no more letters would be sent. For a while this happened but soon the letters were being delivered again. We estimate he has received at least 50 letters. When returning from work one evening there were two representatives from EPS waiting for him. He tells me he does not like going home for fear of more letters and, if anyone were to be waiting, he would drive passed. [Redacted] feels he has been picked on and have a vendetta against him as his neighbours do not receive all these letters or a visit. But more importantly, there has never been an explanation for what they want with his cottage. If his garden was taken from him or the cottage, it would be devasting. He is not able to easily cope with this and he cannot afford the legal representation he would need to represent him.	records, which are not always up to date and may not fully reflect current ownership positions which is one of the reasons that Land Interest Questionnaires (LIQ) are issued to impacted land interests, to verify information. The Applicant acknowledges that this can appear formal, but its purpose is to help the Applicant ensure that the land interest information it holds is accurate and up to date. As part of the Planning Act 2008 the Applicant has a duty to communicate with affected parties and acknowledges that this can result in a number of procedural notices and documentation being sent to affected parties. This is compounded if we are unable to reach affected land interests or do not hear back. The Applicant confirms that there is no intention to compulsorily purchase any homes or gardens for the Scheme. The Applicant encourages the land interest to reach out to the Applicant for any specific points regarding their property interest and updating information, if required.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Two years ago [redacted] became engaged to be married and his plan was to sell the cottage so they could get a place together. But now with all this trouble hanging over him and the value of his property reducing considerably, he says his life has been destroyed and he has had [redacted] due to the impact, all of this, has had on him. We of course support him so he hopefully will cope.	
WR-SC-008	Consultation and Engagement	[Redacted] has the same concerns for all the people in a similar position in this scheme not knowing what the future is for their homes throughout this long process. He is especially concerned for the people of Great Moulton that have so much proposed infrastructure right on their doorsteps.	The Applicant confirms that there is no intention to compulsorily purchase any homes or gardens for the Scheme. The Applicant's communication channels including an email address, Freephone number and Freepost address as well as the Land Referencing Team's communication channels, including a dedicated email address and telephone number remain available for any landowner or resident that has questions or concerns regarding this part of the process. The Applicant acknowledges the point raised on the proposed infrastructure near to Great Moulton and refers the respondent to the **Works Plan [REP1-005 and REP1-006]** which provides more details of the locations of the proposed infrastructure in this locality.
WR-SC-009	Soils and Agricultural Land	Being a former agricultural worker, he is concerned about the loss of so much farmland which is so unnecessary as there	The Applicant notes this comment and refers to WR-SOI-001 and WR-SOI-004 in Table 3.20.

ID	Theme	Comments/Issues Raised	Applicant's Response
		are better ways of doing this before using quality food producing farmland.	
WR-SC-010	Concluding remarks	[Redacted] would like to add that the proposal to use [redacted] as an access road is totally unsuitable. It is a lovely quiet lane lined with trees, public paths and is full of character. However we are a farming community and he knows how crucial it is for farmers to get their land when the weather allows. It is a sacrilege to change this.	The Applicant notes this comment and refers to WR-TRA-001in Table 3.17.
WR-SC-011	Transport and Access	Sites 1A to 2C should be only one access located on B1134 Station Road and all vehicles are to use CRC2 and CRC3 to access the individual sites. Haul route crossing facilities should be used to cross Lodge Road and Frith Way.	The Applicant notes this comment and refers to its response to Adrian Ramsay MP's oral submission at Open Floor Hearing 1 under comment AR-004 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.
WR-SC-012	Transport and Access	The Applicant has put a route down from CRC2 to Lodge Road creating a two-way route for construction and operational traffic on Lodge Road exiting through onto Station Road B1134. There is no reason for this as adequate access is provided by the A140 and the B1134 further along. This route is not connecting to a site or cable run and I can only guess that they are wishing to create another access to the	The Applicant notes this comment and refers to its response to Adrian Ramsay MP's oral submission at Open Floor Hearing 1 under comment AR-004 in **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		B1134 because they have so much transport needs. The NCC has stipulated that only A and B roads should be used for access. I have been trying to get a proper explanation to this for the last 2 months but have no had an answer to my questions yet. Lodge Road is only 3 metres wider and 2.7 in places. 3.5 is recognised as best practice for HGV. The map shows that they intend to feed in from both the west and east. So indicating all their transport for the sites, the BESS and substations on this side of the A140 in its entirety could come down our lane. This added leg is on Tivetshall footpath No 5. They are not connecting to any cables or sites in Lodge Road just the B1134.	
WR-SC-015	Transport and Access	Lodge Road is a quiet narrow C Road very popular with walkers riders and cyclists. There are six public paths leading off it, including Bridle and cycle paths. The National trail of the Boudicca Way, Rebellion cycle route and the Workhouse circular route are all connected to Lodge Road. Lodge Road is an unmetalled road, a cart track that was tarmacked and shingled in the 1950s with no foundations, with only	The Applicant refers to its response regarding impacts to Hundred Lane under comment WR-TRA-016 in Table 3.17.

ID	Theme	Comments/Issues Raised	Applicant's Response
		grass verges all of which damage easily in winter and badly break up and the Council struggle to afford the repairs. This will only be exacerbated by construction traffic are only verges for pedestrians to step onto when vehicles are passing.	
WR-SC-016	Water Environment Transport and Access Utilities	Large drainage ditches run alongside the verges. These are important as flood defence for our homes, fields and roads. In places the ditch is right up to the road. There is also vital communication cables running shallowly under the surface of verges. There are 3 blind bends on this piece of road.	The Applicant notes this comment and refers to WR-TRA-027 regarding road, drainage and utility damage in Table 3.17.
WR-SC-017	Transport and Access	I would like to draw your attention to the documents ES Chapter 11 Transport and Access .APP/6.1.11. Lodge Road in 24 hours (2 way)172 vehicles with 39 judged as HGV. Of course, many of those HGV figures will in fact be farm vehicles as we have 2 busy agricultural farms and 2 livestock farms. Also, it quotes 182 and 41. On the final page it says there will be a 0% increase. This is too confusing to understand.	The Applicant notes this comment and refers to WR-TRA-016 regarding Lodge Road in Table 3.17. The Applicant notes comments on construction vehicle numbers on Lodge Road and remains in dialogue with NCC regarding the use of access A06 on Lodge Road. The status of these discussions will be presented in the updated Statement of Common Ground with NCC at Deadline 3.
WR-SC-018	Transport and Access	The Interested Party attached several annotated maps.[4]	The Applicant notes this comment.

[4] The annotated maps can be found on pages 21 to 22 of [REP1-163]

2.31 The Wright Family

Table 2.31 Applicant's Response to The Wright Family [REP1-133]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-WF-001	Landscape and Visual	I wish to reiterate my family's continuing opposition to this monstrous proposed project. Our house is approximately 500m from Market Lane where I understand the nearest section of the planned panels would be situated. Although we remain deeply committed to a green future, and one where we all need to play our part, this broad end cannot justify the wholly disproportional transformation of a quite beautiful section of the countryside, where we have lived happily and peacefully for over 20 years, in one fell swoop into a semi-industrialised landscape. I do not intend to repeat the details relayed previously (including the enormous strain that would undoubtedly be placed on local residents during the construction period - and presumably maintenance after that - and the seeming sheer unfeasibility of such an enterprise in the planned utilisation of lanes barely wide enough for a car to pass) but would instead implore the Planning Inspectorate to consider the effects that this scheme will have on our and countless other families. If	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • The visual impact to Market Lane under WR-LAN-017. • Impacts to the community strain under WR-DCO-007. • Construction traffic at Market Lane under WR-TRA-015.

ID	Theme	Comments/Issues Raised	Applicant's Response
		granted, planning permission would, I respectfully suggest, represent an aberration and a mistake that would not be rectifiable in my generation's lifetime, and likely also those of the next generation. I would be only too happy to discuss further with anyone from the Inspectorate.	

2.32 Yvonne Davy

Table 2.32 Applicant's Response to Yvonne Davy [REP1-364]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-YD-001	Soils and Agriculture	Yvette Cooper has told us we might have food shortages due to the oil crisis and situation in Iran. So why this proposal to cover good agricultural land with this massive Solar Farm proposal? This will be not only be an eyesore in a beautiful countryside with many public rights of way but short sighted in stopping agricultural activity. Local residents don't want it and the Public Enquiry at Dunston Hall showed East Pye Solar to be Inept and lacking understanding.	The Applicant notes this comment and refers to WR-SOI-002 in Table 3.20.
WR-YD-002	Lands	My home was threatened by a compulsory purchase proposal originally!	The Applicant acknowledges that the wording in letters sent to landowners and properties containing the Land Interest Question (LIQ) letters may have caused concern and confusion. The Applicant provided further information regarding this process in a letter to properties on 24 July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes, gardens and buildings and that this has never formed part of the proposal. The scope of the powers sought on the **Land Plan [APP-006]** shows that powers for compulsorily acquiring land or rights do not extend to such matters. In addition, Article 31(2) makes it expressly clear that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			general power of temporary possession under the DCO does not authorise the undertaker to take temporary possession of any house or garden belonging to a house; or any building (other than a house) if it is for the time being occupied.
WR-YD-003	Transport and Access	The access roads for this development are nigh on impossible and an old bridge will be threatened along with ancient trees and hedgerows	The Applicant notes this comment and refers to its response under WR-TRA-001 regarding suitability of access roads and WR-TRA-004 regarding damage from construction traffic in Table 3.17.

2.33 Zoe Patricia Marie Cawston

Table 2.33 Applicant's Response to Zoe Patricia Marie Cawston [REP1-135]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-ZPC-001	Landscape and Visual Transport and Access	I have lived in Woodton for over 70 years, this East Pye Solar scheme will be spread over some 2000 acres of Best and Most Versatile farmland in this area and if this scheme is approved our beautiful and rural countryside will be ruined. We will no longer be able to walk the public footpaths, horse-ride or cycle safely if this development proceeds. The single track roads between Woodton, Shotesham and Hempnall are only suitable for cars which have to pull over into field openings to pass one another and are definitely not suitable for heavy earth-moving machinery and the vehicles required for the installation of this solar scheme. My direct route to reach our main shopping centre of Norwich from Woodton is via Shotesham and major disruption will be caused for us and all the local people if heavy vehicles use this route.	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-SOI-001 regarding the use of agricultural land. • WR-REC-001 regarding the potential impact to recreational routes. • WR-REC-003 regarding the impact to horse riders and bridleways. • WR-TRA-001 regarding the use of local roads. • WR-TRA-009 regarding proposed traffic controls related to gridlock and congestion.
WR-ZPC-002	Ground Conditions	My family have farmed in Woodton for three generations since the 1940's and we are being greatly affected by this solar scheme in that a cable corridor CRC9 is being proposed to cut through the centre of	The Applicant notes this comment and refers to the following responses in Section 3 of this document: • WR-SOI-004 for restrictions on agricultural activities on the Cable Route Corridor.

ID	Theme	Comments/Issues Raised	Applicant's Response
		our fields in Woodton causing great disruption to our work, lives and crop planning. The displacement of tons of earth from our fields will create problems for us for many years until the area eventually returns to its original condition - if it ever does. We have spent over eighty thousand pounds on drainage to improve the condition of these fields in the last 10 years alone.	• WR-SOI-003 on the impact to soil heath. • WR-CON-018 on compensation with landowners.
WR-ZPC-003	Ecology and Biodiversity	I am very proud to say that for the past 20 years Barn Owls have nested and reared their young in our old brick barns on the farm. The proposed cable corridor CRC9 will run close to their nesting site and will cross their hunting ground it will also run adjacent to Becketts Wood an Ancient Woodland and County Wildlife Site. According to the British Trust for Ornithology I have been advised that as a Schedule 1 species it is an offence to disturb Barn Owls during the breeding season May-September. I am very worried that we will lose these beautiful birds if their habitat is ruined by this scheme. I strongly disapprove of yet more of our prime Norfolk farmland being decimated on this scale for this proposed sprawling and disjointed array of solar panels which will cover some 2000 acres	The Applicant notes this comment and refers to WR-ECO-004 in Table 3.12.

3 The Applicant's Response to Deadline 1 Submissions by Theme

3.1 The DCO Process

Table 3.1 The DCO Process

ID	Comments /Issued Raised	Applicant's Response
WR-DCO-001	Comments noted that the Scheme does not represent sustainable development as defined by the National Planning Policy Framework (NPPF).	The Applicant does not agree that the Scheme represents unsustainable development, nor that it conflicts with planning policy. Section 6 of the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]** sets out how the Scheme complies with relevant national and local planning policies. The NPPF is an overarching document and contains limited specific policies for NSIPs such as the Scheme. The Scheme will primarily be determined in accordance with the National Policy Statements (namely NPSs EN-1, EN-3 and EN-5). However, the NPPF may still be considered by the Secretary of State to the extent it is considered important and relevant to the decision. The NPPF and associated Planning Practice Guidance has been considered, where relevant, in the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**. The **Planning Statement [REP1-074]** demonstrates national policy compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits. A new NPPF was published by government in August 2026. Notably this now no longer refers to 'valued landscapes' and

ID	Comments /Issued Raised	Applicant's Response
		focusses on 'Protected' and 'National' landscapes, none of which are present within the Scheme; states that the previous Ministerial Written Statement *'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land (15 May 2024)'* is now no longer up to date government policy; and removes the concept of 'less than substantial harm' in respect of heritage assets. The Applicant has assessed the likely significant effects of the Scheme on the natural environment and health, including cumulative effects, in the **ES [APP-036** to **APP-195]**. This includes an assessment of tranquillity in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The ES also outlines the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** The Applicant notes new NPPF Policy N1 (1) (c) which states: *'….Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within Protected Landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available* (Applicant's underlining) *and avoiding and minimising harm to designated sites of importance for nature*'; and Policy 'N2 (1) (b), which states:*'…. if significant development of*

ID	Comments /Issued Raised	Applicant's Response
		agricultural land is necessary, use areas of poorer quality land where possible'. NPS EN-3 acknowledges that ground-mounted solar is not prohibited on Best and Most Versatile (BMV) quality land and that land type should not be a predominating factor in determining the suitability of the site location. NPS EN-3 recognises that, at scale, developments may use some agricultural land, and applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land. The **Site Selection Assessment [APP-215]** concludes that no suitable previously developed sites cover a sufficient area to accommodate a utility-scale solar project. Owing to the scale and nature of the Scheme, the Order Limits encompass agricultural land. BMV land was considered during site selection and the design evolution of the Scheme as reported in the **Site Selection Assessment [APP-215]** and **Design Approach Document [APP-212]**. As confirmed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**, the Order Limits was identified as likely to be some of the lowest quality land in the wider area. It is evident that, in respect of initial site selection within a reasonable distance of the grid connection point, no land is identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land. The Scheme would contribute substantially to the need for low carbon energy generation and the Government's objectives and commitments for pursuing a Clean Power energy system

ID	Comments /Issued Raised	Applicant's Response
		and cutting GHG emissions to net zero by 2050, as set out within NPS EN-1 Paragraph 2.3.3.
WR-DCO-002	Comments noted concern about the effectiveness of the Scheme's proposed mitigation measures and/or the ability to reduce impact on local communities.	The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** and are secured through various outline management plans **[REP1-058 to REP1-070]**. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**, **Chapter 11 – Transport and Access [APP-047]**, **Chapter 12 – Noise and Vibration [APP-048]**, **Chapter 13 – Air Quality [APP-049]**, **Chapter 14 - Socio-Economics [APP-050]** and **Chapter 18 - Other Environmental Matters [APP-054]**. The specificity of the outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**. Paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to confirm when applying for approval of a secured plan whether it would give rise to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that the effectiveness of the mitigation measures identified in the ES will be secured by ensuring that the final design of the Scheme falls within the framework of the conclusions of that Environmental Statement. Breach of a DCO or failure to comply with Requirements is a criminal offence. Management plans are secured via the

ID	Comments /Issued Raised	Applicant's Response
		Requirements contained within Schedule 2 of the **Draft DCO [REP1-014]**. The Applicant has prepared a **Statutory Nuisance Statement [APP-208]**. This draws upon the assessment conclusions from Environmental Statement and concludes that the construction, operation and maintenance, and decommissioning of the Scheme would not give rise to any impacts that would constitute a statutory nuisance under Section 79(1) of the Environmental Protection Act 1990.
WR-DCO-003	Comments stated that the Draft DCO relies too heavily on later plans, later approvals and later mitigation.	The use of outline management plans is standard practice for solar DCO projects. This reflects the Rochdale Envelope approach, whereby certain design and construction details are refined post-consent, with detailed plans secured through Requirements in the Draft DCO. The likely significant effects of the construction, operation and decommissioning of the Scheme have been comprehensively assessed in the **ES [APP-036** to **APP-195]**, which also identifies mitigation measures. The outline management plans **[REP1-058 to REP1-070]** are designed with the objective of securing the relevant environmental mitigation measures set out within the ES. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the **Draft DCO [REP1-014]**. These detailed management plans will be submitted to and approved by the relevant planning authority. This will ensure that environmental impacts throughout the lifetime of the Scheme are appropriately controlled.

ID	Comments /Issued Raised	Applicant's Response
		Further, the **Works Plan [REP1-005** and **REP1-006]** and the **Design Principles, Parameters and Commitments [REP1-078]** are secured as certified documents within Schedule 12 (Documents and plans to be certified) to the **Draft DCO [REP1-014]**, and as such, the Scheme aligns with the design principles laid out.
WR-DCO-004	Comments expressed concern about the Scheme being decided by the Government rather than local planning authorities, parish councils or local residents.	The Scheme has an anticipated generating capacity of approximately 500 MW and therefore exceeds the 100 MW threshold for a Nationally Significant Infrastructure Project (NSIP). As a result, the Scheme is subjected to the Planning Act 2008 and must be consented through a Development Consent Order (DCO), examined by the Planning Inspectorate on behalf of the Secretary of State for Energy Security and Net Zero, rather than determined by the local planning authority. The legislative context for the Scheme is set out in the **Planning Statement [REP1-074]**. While the Applicant is legally required to use the Planning Act process for this reason, the local planning authorities still have a significant role in the DCO process. In particular, they have a function in discharging the requirements of the DCO (which operate in a similar way to a condition on a planning permission) and can consult with other statutory bodies as part of that process in informing their decision to approve the discharge of a requirement. They also have a significant role in the monitoring and enforcement of the requirements of the DCO.
WR-DCO-005	Comments expressed that Scheme conflicts with local and national planning policy. Some respondents highlighted local plans such as	An appraisal of the Scheme against national and local planning policy is set out within the **Policy Compliance Document [REP1-076]**. This includes an appraisal against the Greater Norwich Local Plan and South Norfolk Local Plan Development Management Policies Document. It is the Applicant's view that

ID	Comments /Issued Raised	Applicant's Response
	Greater Norwich Local Plan and South Norfolk Local Plan.	the Scheme complies with relevant national and local planning policy. In relation to Policy 1 (Sustainable Growth Strategy) of the Greater Norwich Local Plan, the **Statement of Need [APP-206]** and the **Planning Statement [REP1-074]** explain that the Scheme produces urgently needed low carbon energy generation and, if consented, will contribute to the achievement of delivering sustainable development that enables decarbonisation. Regarding Policy 2 (Sustainable Communities) and 3 (Environmental Protection and Enhancement), during the design process, the natural environment and heritage assets were considered, and the mitigation hierarchy applied to avoid, reduce, mitigate or compensate for, through the design process. The Applicant has identified environmental protection and enhancement measures in the **ES [APP-036** to **APP-195]** and are secured through various outline management plans **[REP1-058 to REP1-070]** to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** Policy 5 (Homes) and Policy 7.4 (Village Clusters) of the Greater Norwich Local Plan are not considered relevant to the Scheme as they are concerned with the provision, location and allocation of housing development rather than the delivery of nationally significant energy infrastructure. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement**

ID	Comments /Issued Raised	Applicant's Response
		[REP1-074]. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.
WR-DCO-006	Comments stated that the Applicant had acknowledged that the Scheme would result in significant environmental effects, including residual effects on landscape, wildlife, soils, and heritage assets, following the implementation of mitigation measures.	The Applicant acknowledges that there will be some unavoidable impacts on the environment as a result of the Scheme. The Applicant has assessed the likely significant effects of the Scheme in the **ES [APP-036 to APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are mitigated as far as practicable and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**, breach of which would be a criminal offence. No significant adverse residual effects have been identified in relation to wildlife, soils, and heritage assets. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. Furthermore, the **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]** demonstrates that, following the implementation of mitigation and enhancement measures, the Scheme would give rise to a number of beneficial residual effects, particularly in relation to biodiversity enhancement, habitat creation and management, alongside its significant contribution to renewable energy generation and the reduction of greenhouse gas emissions.
WR-DCO-007	Comments stated that the Scheme is being forced upon local people.	The Scheme is being brought forward through the statutory framework set out in the Planning Act 2008, which sets out the

ID	Comments /Issued Raised	Applicant's Response
		thresholds for nationally significant infrastructure projects. The Scheme, as an onshore solar generating station in England with a capacity of more than 100MW, falls within section 15 of the Planning Act 2008. The consultation process is set out in the **Consultation Report [APP-024]**, which details the Applicant's approach to pre-application consultation. Throughout the consultation periods, anyone was welcome and encouraged to get in touch using any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events. The Applicant also notes that the Examination process provides a further opportunity for Interested Parties to comment on the Scheme. This Examination is managed by the independently appointed Examining Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an Interested Party.
WR-DCO-008	Comments noted that if there were plans to cover 100 fields with houses those plans would not be treated as one single application.	The Planning Act 2008 sets out the thresholds for nationally significant infrastructure projects. The Scheme, as an onshore solar generating station in England with a capacity of more than 100MW, falls within section 15 of the Planning Act 2008. This means the Scheme must be consented through the DCO regime and is treated as a single application.

ID	Comments /Issued Raised	Applicant's Response
		The Applicant has assessed the likely significant effects of the Scheme as a whole in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The **Statement of Need [APP 206]** explains that proposals may comprise adjoining parcels of land or separate parcels of land which do not border each other but instead combine to an integrated Scheme which is more dispersed within a countryside setting. Further, the connection of separate parcels of suitable land together into a single Scheme may, subject to analysis, enable those parcels of land to connect appropriately to the electricity system, whereas if developed as stand alone projects they may not be able to carry the associated costs of connection and therefore may never be developed. The Scheme comprises a single integrated NSIP, including the solar PV arrays, Battery Energy Storage System, substations, National Grid Substation and Grid Connection Infrastructure, which collectively function to generate, store and export electricity to the national transmission network. The Scheme has therefore appropriately been assessed and applied for as a single project for the purposes of the DCO Application and Environmental Impact Assessment.
WR-DCO-009	Comments stressed that the Scheme conflicts with South Norfolk and Broadland Council's projects such as Community Grants, Pride in Place, Heritage, Housing and Green Grants Projects.	The Applicant acknowledges these grants. It is the view of the Applicant that the Scheme would not preclude the continuation of existing community grant programmes or the establishment of future grants.

ID	Comments /Issued Raised	Applicant's Response
		The Applicant reaffirms its commitment to the provision of a Community Benefit Fund should the Scheme be consented. Information on the mechanics of the Community Benefit Fund and the areas to which it will contribute will be developed through consultation with South Norfolk Council and Norfolk County Council. The Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).
WR-DCO-010	Comments noted that Scheme is already a done deal and will be approved regardless.	The application will be examined and determined on its merits in accordance with the statutory framework set out in the Planning Act 2008. No decision has been made or predetermined at this stage and is subject to an Examination by the Examining Authority, with the decision made by the Secretary of State.
WR-DCO-011	Commented noted concerns that proposals are fundamentally unjustified and procedurally deficient.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Schedule 4 of the EIA Regulations has been adequately addressed within the ES. Table 1.3 within **ES Volume 1, Chapter 1 – Introduction [APP-037]** provides cross-reference to the relevant documents demonstrating where each of these requirements has been satisfied. The **ES [APP-036 to APP-195]** has been prepared by competent experts with considerable experience assessing similar schemes. Details of

ID	Comments /Issued Raised	Applicant's Response
		qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]**. The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 & 2.10.2). The **Statement of Need [APP-206]** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.8 and 3.2.9.
WR-DCO-012	Some commentors asked whether maps, parish descriptions and DCO articles allow development or later changes beyond what has already been assessed by the Applicant. There were requests were corrections and precise, enforceable requirements so key limits and mitigation cannot be weakened after consent.	The Applicant notes the concerns raised. The **Draft DCO [REP1-014]** defines the authorised development and secures the Scheme through the certified plans, the **Design Principles, Parameters and Commitments (DPPC) [REP1-078]**, and the Requirements in Schedule 2. The authorised development must be carried out within the Order Limits and the areas shown on the Works Plans. Detailed design flexibility is constrained by the maximum and minimum parameters secured through the DPPC and assessed through the Environmental Statement. Requirement 5 requires detailed design approvals to accord with the DPPC, whilst Requirement 3 restricts amendments to approved documents where these would give rise to materially new or materially different environmental effects. In addition, Schedule 15 requires applications for discharge of requirements to identify whether any materially new or materially different environmental effects would arise in comparison with those assessed. The **Draft**

ID	Comments /Issued Raised	Applicant's Response
		DCO [REP1-014] also contains authority approval mechanisms and protective provisions for statutory undertakers. The Applicant therefore considers that the DCO provides a robust and enforceable framework to ensure that development remains within the assessed envelope and that secured mitigation and commitments cannot be altered without appropriate scrutiny and approval.
WR-DCO-013	Requests for policy compliance and the overall planning balance to be reflected in the full body of submitted local evidence.	The policy assessment, need case and overall planning balance are set out within the **Planning Statement [REP1-074]** and the **Statement of Need [APP-206]**, supported by the Environmental Statement and other application documents. The Applicant acknowledges that a range of views and evidence have been submitted throughout the Examination and notes that all representations will be available to the Examining Authority and Secretary of State as part of the decision-making process. The Applicant's assessment identifies a number of residual adverse effects, which are transparently reported within the Environmental Statement and considered within the planning balance. Having regard to the national policy support for renewable energy infrastructure, the identified need for the Scheme, and the environmental, economic and social benefits arising from it, the Applicant considers that these residual adverse effects are outweighed by the benefits of the Scheme, including its contribution towards decarbonisation, renewable energy generation and energy security. The Applicant therefore considers that the application provides an appropriate basis for the Examining Authority and Secretary of State to assess the Scheme against the relevant policy

ID	Comments /Issued Raised	Applicant's Response
		framework and to reach a conclusion on the overall planning balance.
WR-DCO-014	Comments noted the wider concerns around land use, recreation routes, spatial efficiency and removal of sensitive sites such as Site 3. Some noted requests for clearer planning justification, and response to the specific alternatives and local impacts raised.	The Applicant notes the concerns raised. The site selection process, alternatives considered and evolution of the Scheme are explained within the application documents, including the **Site Selection Assessment [APP-215]**, **ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041]**, the **Design Approach Document [APP-212]** and the **Planning Statement [REP1-074]**. The Scheme has been refined through iterative design, environmental assessment and consultation feedback to avoid or reduce environmental and community effects where reasonably practicable, including the removal and refinement of development areas, provision of setbacks and buffers, retention of sensitive features, and amendments to the layout to reduce effects on residential amenity, heritage assets, landscape character and Public Rights of Way. The design process also considered the efficient use of available land and optimisation of the available grid connection capacity whilst seeking to minimise environmental effects. The Applicant's assessment concludes that there are no locations within the defined search area that are both more suitable and available than the proposed location for the Scheme. The likely effects on recreational routes, landscape, heritage, ecology, land use and other environmental receptors have been assessed within the Environmental Statement, with embedded mitigation and additional mitigation measures incorporated into the Scheme design and secured through the application documents. The Applicant therefore considers that the application provides a clear planning justification for the proposed development and a

ID	Comments /Issued Raised	Applicant's Response
		proportionate response to the alternatives and local impacts identified during consultation and Examination
WR-DCO-015	Questions were raised as to whether the Applicant has met compulsory acquisition tests for affected homes and holdings. Others requested property-specific evidence and corrections, and a demonstration that public benefit outweighs private loss.	The justification for the use of compulsory acquisition powers is set out in the **Statement of Reasons [APP-020]**. The Applicant confirms that compulsory acquisition and temporary use powers are being sought only where considered necessary with a preference for voluntary agreements to be entered into. Residential properties are not sought for acquisition. If the compulsory acquisition powers are exercised, compensation will be payable in accordance with the compensation code.

3.2 Consultation and Engagement

Table 3.2 Consultation and Engagement

ID	Summary of Representation	Applicant's Response
WR-CON-001	Comments noted dissatisfaction with the consultation and engagement of the Applicant to date and noted that this was inadequate.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions. It is the Applicant's view that the consultation material provided sufficient information for the emerging Scheme to be understood. The acceptance of the Applicant's DCO application for Examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. Each of the host and neighbouring authorities provided adequacy of consultation representations **[AoC-001 to AoC-008]**, confirming that they considered the Applicant met the statutory consultation requirements. The consultation process is set out in the **Consultation Report [APP-024]**, which details the Applicant's approach to pre-application consultation. Throughout the consultation period, anyone was welcome and encouraged to get in touch using any of the free-to-use

ID	Summary of Representation	Applicant's Response
		communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly from the Applicant's project team. The Applicant also notes that the Examination process provides a further opportunity for Interested Parties to comment on the Scheme. This Examination is managed by the independently appointed Examining Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an Interested Party.
WR-CON-002	Comments noted difficulty accessing DCO application documents, including the Works Plan.	The Applicant provided a detailed step-by-step explanation on how to access and view the different layers of the Works Plan. The instructions are in the introductory section of the revised **Works Plan [REP1-005 and REP1-006]**, submitted to the Planning Inspectorate in April 2027. In addition to the above, USB memory sticks with the full suite of application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library. The Applicant's Community Relations team has also been available to assist members of the public via a series of free-to-

ID	Summary of Representation	Applicant's Response
		use communication channels (phone, post and email). These channels were publicised through newspaper adverts and press release, on the Applicant's website, in consultation materials and on- site notices. The Applicant welcomed enquiries and feedback from any interested party through these channels. The application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory sticks were available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-003]**, which confirmed acceptance of the DCO application by the Planning Inspectorate (on behalf of the Secretary of State), provided further information on obtaining DCO application documents.
WR-CON-003	Comments stressed the rural nature of the Scheme location and that some residents have poor or no access to internet connection to view DCO application documents.	As detailed in the **Consultation Report [APP-024]** whilst consultation materials were made available online, alternative means of access were also provided for those who were digitally excluded or preferred non-digital engagement during both Phase One consultation and Phase Two consultation events. Physical copies of consultation materials could be requested through via the Applicant's free-to-use communication channels (phone, email and post) which remained available throughout the consultation period to assist individuals accessing documentation and to provide further information

ID	Summary of Representation	Applicant's Response
		about the Scheme. The Applicant therefore considers that proportionate measures were put in place to enable participation from a broad range of stakeholders, irrespective of their access to digital technologies.
WR-CON-004	Comments noted dissatisfaction with the level of information available at consultation events, particularly around site specific impacts.	The Applicant sought to ensure that consultation events were attended by a range of specialist consultants and technical experts to enable discussion of the various topics associated with the Scheme. This included, amongst others, consultants that specialised in landscape, transport and access, ecology, BESS, planning and EIA. The purpose of having a multidisciplinary team present at the consultation events was to provide attendees with access to individuals responsible for undertaking the relevant assessments and to allow concerns across a wide range of environmental and technical topics to be discussed directly with the experts. The Applicant recognises that some questions may have required a more detailed response than could be provided during an event, where this was the case questions were noted by consultants and followed up on.
WR-CON-005	Comments noted that the real scale and extent of the proposals haven't been transparently shown to local residents.	The Applicant has undertaken consultation at multiple stages of the Scheme's development, providing information on the Scheme through consultation materials, public events, the project website, Community Access Points and direct engagement with stakeholders and local communities.

ID	Summary of Representation	Applicant's Response
		Non-Statutory Consultation (Phase One) was undertaken from 23 October to 6 December 2024, with the aim of introducing the Scheme, presenting the emerging proposals and providing an opportunity for individuals and interested parties to share their views. Statutory Consultation (Phase Two) on the Preliminary Environmental Information Report (PEIR) was subsequently undertaken between 18 June and 6 August 2025, providing a 49-day consultation period which exceeded the statutory minimum requirement. Further Targeted Consultation was undertaken between 22 October and 26 November 2025. To publicise the consultation and maximise awareness of the proposals, the Applicant distributed a community consultation postcard to over 8,400 properties, issued press releases to local and trade media, distributed posters to over 70 local information points, provided hard copies of consultation materials at Community Access Points, maintained project information on the project website, and contacted key stakeholders, including MPs, councillors, parish councils and individuals registered on the Scheme's keep informed list. The Applicant has continued to engage with stakeholders and those who requested project updates throughout the process. Accordingly, the Applicant considers that proportionate and extensive measures were undertaken to communicate the scale and extent of the proposals and to provide opportunities for interested parties to understand and comment on the Scheme.

ID	Summary of Representation	Applicant's Response
WR-CON-006	Comments noted that the Applicant showed little or no sympathy towards local residents during the pre-application stage.	The Applicant acknowledges the respondent's concerns regarding the potential effects of the Scheme on local residents. Throughout the development of the Scheme, the Applicant has sought to engage openly and constructively with local communities, providing opportunities for residents to express their views and raise concerns through consultation events, community engagement activities and ongoing communication channels. The Applicant remains committed to engaging respectfully with affected communities and to considering issues raised throughout the Examination process.
WR-CON-007	Comments noted disappointment at the level of information provided by the Applicant's team at events or in correspondence.	The consultation events were attended by members of the project team and specialist consultants with expertise across a range of environmental, technical and planning disciplines. This was intended to provide attendees with opportunities to discuss a wide range of topics and receive information from those responsible for informing the design of the Scheme and undertaking the assessments. The Applicant considers that an appropriate range of specialists was available throughout the consultation process to support engagement on the environmental and technical matters associated with the Scheme. The Applicant recognises that some questions may have required a more detailed response than could not be provided during an event, where this was the case questions were noted by consultants and followed up on.

ID	Summary of Representation	Applicant's Response
WR-CON-008	Comments noted that the consultation process hasn't been democratic, with objections ignored.	Consultation responses, including objections, were recorded, considered and reported on as part of the consultation process, as evidenced in the **Consultation Report [APP-24]**. Regard has been had to all consultation feedback received. Consultation feedback has also informed the design evolution of the Scheme, as set out in the **Design Approach Document [APP-212]**.
WR-CON-009	Comments noted cynicism towards how the Applicant has considered consultation feedback and Examination submissions.	The Applicant can confirm that all Relevant Representations submitted to the Planning Inspectorate have been recorded by the Planning Inspectorate and provided to the Applicant via the Examination Library. Each Relevant Representation has been assigned a unique reference code by the Planning Inspectorate, ensuring that these can be individually identified and tracked throughout the Examination process. In preparing the Applicant's Response to Relevant Representations, each Relevant Representation has been reviewed and responded to in this document. The Applicant has therefore had regard to all Relevant Representations. The Examining Authority will also consider all Relevant Representations, alongside the Applicant's responses and any subsequent submissions, in reaching a recommendation.
WR-CON-010	Comments stated that the Applicant had not responded to questions sent via the communication channels.	The Applicant acknowledges the respondent's comment. The consultation process generated a significant volume of correspondence and enquiries. The Applicant has sought to fully engage and continues to engage with these wherever practicable.

ID	Summary of Representation	Applicant's Response
		The Applicant's records indicate that consultation responses received through the published consultation channels were logged and considered as part of the consultation process. A full record of pre-application consultation activity can be found in the **Consultation Report [APP-024]**.
WR-CON-012	Comments emphasised the need for accompanied site inspections.	The Applicant notes the respondent's request for an accompanied site inspection. The arrangements for any site inspections during the Examination are matters for the Planning Inspectorate. Interested Parties have an opportunity to make suggestions at Procedural Deadline A for locations that the Examining Authority should visit. A **draft Accompanied Site Visit itinerary [EXAM/9.1]** has been submitted at Deadline 2.
WR-CON-013	Comments noted that some residents were not identified as an affected party during the targeted consultation.	The Targeted Consultation held by the Applicant requested community feedback on small additional parcels of land, as described in **Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]**. The Applicant undertook a proportionate land referencing exercise in advance of the Targeted Consultation, using Land Registry records and questionnaire activities to identify parties with a legal interest in, or who may be affected by, the additional land proposed to be included within the Order Limits. The Applicant considers that the land referencing and consultation processes were undertaken in accordance with established guidance and were proportionate to the nature and extent of the proposed amendments.

ID	Summary of Representation	Applicant's Response
WR-CON-014	Comments stated that the haul access routes were not presented at statutory consultation.	Options for internal haul routes were described in the PEIR at Statutory Consultation, together with likely access points and potential construction routes to the Scheme. Information regarding the proposed access strategy and construction traffic routes were developed through the design process, and the Applicant has continued to refine the access strategy through ongoing engagement with NCC as the Local Highway Authority and other stakeholders. Access points and internal routings are detailed in **ES Volume 2, Figures 11.2 - 11.8 - Likely and Suitable Access Routes to the Scheme [APP-095]**. Route descriptions and transport and access effects have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** together with mitigation measures which are secured through the **Outline CTMP [REP1-068]**.
WR-CON-015	Comments raised concern for the use of compulsory purchase and/or compulsory acquisition powers, noting widespread anxiety caused by notices and/or letters regarding compulsory acquisition/purchase powers.	The Applicant's goal is to deliver the Scheme on land where the owner has voluntarily agreed to its use. Meaningful conversations have helped inform the design which in turn assists in avoiding people's homes and gardens. As is standard in NSIP solar schemes, the **Draft DCO [REP1-014]** includes provision for compulsory acquisition of land and rights. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme. See the explanation in the **Statement of Reasons [APP-020]**. The Applicant acknowledges that the wording in letters sent to landowners and properties containing the Land Interest

ID	Summary of Representation	Applicant's Response
		Question (LIQ) letters may have caused concern and confusion. The Applicant provided further information regarding this process in a letter to properties on 24 July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes, gardens and buildings and that this has never formed part of the proposal. The scope of the powers sought on the **Land Plan [APP-006**] shows the extent of the powers being sought for compulsorily acquiring land or rights. In addition, Article 31(2) makes it expressly clear that the general power of temporary possession under the DCO does not authorise the undertaker to take temporary possession of any house or garden belonging to a house; or any building (other than a house) if it is for the time being occupied. The Applicant is committed to engaging with landowners in an open, transparent and respectful way. As part of the DCO process, the Applicant is legally required to identify anyone who may have land that could be affected by the Scheme. The LIQ is part of this legal process. The Applicant acknowledges that this can appear formal, but its purpose is to help the Applicant ensure that the land interest information it holds is accurate and up to date. The Applicant updated its website with FAQs relating to the LIQ process during the Phase Two statutory consultation to help address any of the community's concerns. The Applicant's communication channels including an email address, Freephone number and Freepost address as well as the Land Referencing Team's communication channels,

ID	Summary of Representation	Applicant's Response
		including a dedicated email address and telephone number remain available for any landowner or resident that has questions or concerns regarding this part of the process.
WR-CON-016	Comments argued that they should have been identified as a Category 3 interest.	The Applicant notes the respondent's request to be identified as a Category 3 interest. In preparing the **Book of Reference [REP1-018]**, the Applicant undertook a detailed assessment of all land interests that may be affected by the Scheme, drawing on land referencing investigations, environmental assessments and other relevant project information. This assessment was carried out in accordance with the requirements of the Planning Act 2008. The Applicant will also keep the Book of Reference under review during Examination and will update the Book of Reference where provided with evidence of new interests.
WR-CON-017	Comments raised concerns regarding the compulsory purchase of a pavement area in respect of The Street and the side of the War Memorial in Saxlingham Nethergate.	The Applicant can confirm that no part of the registered title of Saxlingham Nethergate War Memorial falls within the Order Limits. Accordingly, no powers of compulsory acquisition or temporary possession can be or are sought within the scope of the works for the Scheme. As set out in the **Land Plan [APP-006]** (page 5 (sheet 3)) and **the Book of Reference [REP1-018]** the only land plots in this location for which rights are sought are Plots 03-001 and 03-002. Both plots are located wholly within adopted highway land. No rights are sought over land outside the adopted highway, including any land forming part of the curtilage of the War Memorial or The Old Rectory, for AIL movements or any other purpose.

ID	Summary of Representation	Applicant's Response
		Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the **Outline CTMP [REP1-068]** to ensure the protection of nearby assets, including the War Memorial and The Old Rectory. Requirements for AIL will be determined through the detailed design process and in consultation with statutory consultees. As part of the management of AIL, the selected hauler must notify the police, highway authorities and bridge owners when planning to transport AILs.
WR-CON-018	Comments raised concern regarding the lack of compensation for landowners.	The Applicant confirms that option agreements have been entered into with all of the Solar PV Site landowners and negotiations are ongoing with landowners within the CRC and land associated with the works of the overhead lines in Site 1. **REP1-018**
WR-CON-019	Comments enquired about the process for receiving compensation as a Category 3 Person.	The Applicant has submitted the **Book of Reference [REP1-018]**. This includes persons who may be eligible to claim compensation if the DCO is granted. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any diminution in value due to physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. **REP1-018**

ID	Summary of Representation	Applicant's Response
WR-CON-020	Comments raised concerns regarding the removal of hedges and vegetation work in Saxlingham Nethergate, noting that these will affect private properties and residents have been notified.	The Applicant acknowledges the respondents concern regarding vegetation removal for construction access and highway visibility splays. The Applicant refers the respondent to Plot 03-001 as set out in the **Land Plan [APP-006]** (page 5 (sheet 3)). The Applicant wishes to reassure the respondent that these plots are wholly within the adopted highway and do not impact private property. Saxlingham Nethergate will not be used for general construction HGV traffic and the only construction traffic expected will be for the movement of AILs. For visibility splay for vehicles and highway works associated with AIL movements, vegetation may be required to be trimmed and, in some cases, vegetation removed when absolutely necessary to maintain the required sight lines for safety and to accommodate oversail. Site access, visibility splays and swept-path analysis is detailed in Appendix C of **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174 to APP-177]**.
WR-CON-021	Comments raised concerns about the Saxlingham Nethergate traffic route, and heritage assets being compulsorily purchased.	The Applicant can confirm that no part of the registered title of Saxlingham Nethergate War Memorial falls within the Order Limits. Accordingly, no powers of compulsory acquisition or acquisition of rights are sought over are within the scope of the proposed development works.
WR-CON-022	Comments raised concerns about navigating large documents and that the Examination is predominately an online process. Requests were made for accessible information, accurate	The Applicant notes the concerns raised. The consultation approach, responses and accessibility measures are recorded in the Consultation Report, while Interested Parties may continue to participate through the Examination. The Outline CEMP provides for community liaison during construction; any

ID	Summary of Representation	Applicant's Response
	response tracking and clear property-specific answers.	attribution or indexing issue should be read against the original representation and the substantive response. The Applicant notes this comment and refers to its response regarding navigating DCO documents under comment CON-002 in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]**. The Applicant's Community Relations team remains available to assist members of the public via a series of free-to-use communication channels (phone, post and email) with the DCO documentation.

3.3 The Applicant

Table 3.3 The Applicant

ID	Summary of Representation	Applicant's Response
WR-APL-001	Comments included objections to the Scheme.	The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 and 2.10.2). The **Statement of Need [APP-206]** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.8-3.2.9. The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** are comprehensive and robust and the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. In the event of a conflict between the development plan and the NPS, the NPS prevails for the purpose of the Secretary of State decision making given the national significance of the Scheme.
WR-APL-002	Comments raised concern about the motivation behind the Scheme, with some	The Applicant notes the concerns about the reasons behind the Scheme.

ID	Summary of Representation	Applicant's Response
	noting financial greed or calling this 'greenwashing'.	The **Statement of Need [APP-206]** provides evidence that the Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant is committed to meeting planning and environmental policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
WR-APL-003	Comments raised concerns towards the Applicant, Island Green Power and/or Macquarie.	The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated the Scheme's compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO Requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The Applicant has experience of developing NSIP scale projects, notably the consented Cottam Solar Project; West Burton Solar Project; and Green Hill Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs.

ID	Summary of Representation	Applicant's Response
		The **Funding Statement [APP-021]** provides details of the corporate structure of the Applicant, East Pye Solar Limited, and how the Scheme is being funded.
WR-APL-004	Comments noted concerns about foreign investment in the Scheme.	The Applicant, East Pye Solar Limited, is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure schemes and helps fund the transition to clean energy at the scale required. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered in full.
WR-APL-005	Comments noted the cost of the Scheme, funding and where this money will come from.	The Applicant acknowledges comments regarding the cost effectiveness and profitability of the Scheme. However, it is important to clarify that the Scheme is a privately financed development. All financial risks associated with the construction, operation, and decommissioning of the Scheme are borne entirely by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full, including for the ongoing operation, maintenance, and eventual decommissioning.
WR-APL-006	Comments noted the BESS' Gate 1 status, the implications of this and asked for an explanation of this process with NESO / Ofgem.	As set out in the **Grid Connection Statement [APP-207REP1-072]**, the Applicant confirms that it has received notification of a Gate Two, Phase One offer for the solar element of the Scheme. Whilst a Gate One notification has been received for the BESS element, it is fully

ID	Summary of Representation	Applicant's Response
		anticipated that, should the Scheme receive consent, co-located technologies will be prioritised and the Gate offer for the BESS would be upgraded or improved. This expectation is supported by the Applicant's other consented projects, the Cottam Solar Project and the West Burton Solar Project, both of which received Gate Two offers for solar and BESS at the time of notifications in November 2025 due to their earlier DCOs being granted. The Applicant notes that further rounds of notifications are anticipated, which are expected to reflect advances in project timelines across the network. The Applicant clarifies that Gate offers are only granted to parties that have secured a grid connection with National Grid, as set out in the **Grid Connection Statement [APP-207REP1-072]**. The Applicant therefore has a secured connection for both elements of the Scheme.
WR-APL-007	Comments noted concern that the Applicant could become bankrupt before the Scheme is decommissioned.	The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Applicant notes that Island Green Power is in the process of discharging the requirements necessary to commence the West Burton Solar Project. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the DCO will remain bound by the legally enforceable requirements of the DCO. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and the delivery of the Scheme in full can be adequately funded. The **Draft DCO [REP1-014]** secures a Requirement for decommissioning and restoration to ensure that the Scheme, apart from the National Grid Substation and the Grid Connection

ID	Summary of Representation	Applicant's Response
		Infrastructure which will remain in-situ, is decommissioned at the end of the 60-year operational lifetime.
WR-APL-008	Comments asked about a decommissioning bond, which would set aside funding for decommissioning at the end of the Scheme's lifecycle. Other comments noted whether this would be funded by the taxpayer. Some comments requested financial security, clear timescales and identification of impacts in advance of decommissioning commencing.	The Applicant notes the concerns raised. Requirement 21 of the **Draft DCO [REP1-014]** secures the decommissioning and restoration of the Scheme, apart from the National Grid Substation and Grid Connection Infrastructure, at the end of the 60-year operational period. The obligation would sit with the owner of the Scheme at the time of decommissioning and would continue to apply notwithstanding any future transfer of ownership. Failure to comply with the relevant DCO Requirement constitutes a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary. The Scheme is a privately financed development. All financial risks associated with the construction, operation, and decommissioning of the Scheme are borne entirely by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. A detailed Decommissioning Environmental Management Plan must be prepared substantially in accordance with the **Outline DEMP [REP1-062]** and approved by the relevant planning authority before decommissioning commences. This would include the timetable and

ID	Summary of Representation	Applicant's Response
		detailed approach to removal, restoration and infrastructure proposed to remain. The Applicant's current position is that the solar generating infrastructure, BESS and Project Substations would be removed, with tracks and affected land restored as far as practicable. The treatment of buried cables would reflect government policy and good practice at the time. The National Grid Substation and Grid Connection Infrastructure would remain in situ, together with associated planting managed by National Grid Electricity Transmission. The Scheme is privately financed and the financial risks associated with its decommissioning are borne by the developer. Agreements with landowners include decommissioning securities covering breach or insolvency, with the amount regularly revalued and topped up where necessary. The Applicant does not consider that a separate DCO requirement for a ring-fenced decommissioning fund is necessary or reasonable.
WR-APL-009	Comments requested that the ExA recommend refusal of the Scheme's DCO.	As set out in the **Planning Statement [REP1-074]**, having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The **Policy Compliance Document [REP1-076]** further demonstrates the Scheme's compliance with the relevant NPS.
WR-APL-010	Comments noted concern that no compensation existed for homeowners and landowners.	The Applicant's **Book of Reference [REP1-018]** includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim

ID	Summary of Representation	Applicant's Response
		compensation for any diminution in value due to physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
WR-APL-011	Comments supported Block East Pye Solar's objections and Examination submissions.	The Applicant's detailed response to comments made by Block East Pye Solar can be found in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-APL-012	Comments raised concern regarding the alleged lobbying of DESNZ on behalf the Applicant and Macquarie.	The Applicant does not agree that the matters raised give rise to an appearance of bias in the determination of the Application and the nature of the Scheme's grid connection. No evidence has been provided that the meeting concerned the merits of the Scheme's Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment. A meeting in January 2025 between DESNZ officials, the Applicant and Macquarie took place in the context of the Department of Energy Security and Net Zero's (DESNZ) wider policy and delivery responsibilities relating to electricity network infrastructure and the connection of solar and BESS projects to the transmission system. Engagement between DESNZ officials, the Applicant and Macquarie on grid connection matters is consistent with the wider engagement that routinely takes place between government departments, developers, investors, network operators, and other stakeholders in relation to electricity network connections and reform, and does not in itself indicate bias, predetermination or preferential treatment.

ID	Summary of Representation	Applicant's Response
		The Applicant notes that the assertions made in this Written Representation regarding the meeting are speculative and are not supported by evidence of bias. NESO has also commented publicly: "*NESO rejects any suggestion that its independent analysis or advice has been influenced by any individual developer. We engage regularly with stakeholders across the energy sector, but that engagement does not unduly influence NESO's objective advice or assessments*". The Planning Act 2008 process includes safeguards intended to ensure that applications for development consent are considered fairly and on the basis of the evidence before the decision maker. The grid connection for the Scheme, including its connection date, secured agreement and timelines are contained within the **Grid Connection Statement [APP-207REP1-072]**.
WR-APL-013	Comments noted the speed in which the application is going through the planning process.	The development timeline is governed by strict statutory requirements of the Planning Act 2008 for NSIP. Prior to submitting the Scheme, the Applicant has spent a substantial period within the pre-application stage undertaking environmental surveys, environmental assessment and an iterative design evolution process, together with Non-Statutory, Statutory Consultation and Targeted Consultation. This application process has given local communities, parish councils and statutory consultees windows to view and comment on the Scheme. Feeback received during these consultations has been formally reviewed and influenced the application documents.

3.4 Energy Need and Grid Connection

Table 3.4 Energy Need and Grid Connection

ID	Summary of Representation	Applicant's Response
WR-APL-001	Comments included objections to the Scheme.	The Applicant's **Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 and 2.10.2). The **Statement of Need [APP-206]** confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.8-3.2.9. The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** are comprehensive and robust and the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. In the event of a conflict between the development plan and the NPS, the NPS prevails for the purpose of the Secretary of State decision making given the national significance of the Scheme.
WR-APL-002	Comments raised concern about the motivation behind the Scheme, with some	The Applicant notes the concerns about the reasons behind the Scheme.

ID	Summary of Representation	Applicant's Response
	noting financial greed or calling this 'greenwashing'.	The **Statement of Need [APP-206]** provides evidence that the Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant is committed to meeting planning and environmental policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
WR-APL-003	Comments raised concerns towards the Applicant, Island Green Power and/or Macquarie.	The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated the Scheme's compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO Requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The Applicant has experience of developing NSIP scale projects, notably the consented Cottam Solar Project; West Burton Solar Project; and Green Hill Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs.

ID	Summary of Representation	Applicant's Response
		The **Funding Statement [APP-021]** provides details of the corporate structure of the Applicant, East Pye Solar Limited, and how the Scheme is being funded.
WR-APL-004	Comments noted concerns about foreign investment in the Scheme.	The Applicant, East Pye Solar Limited, is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure schemes and helps fund the transition to clean energy at the scale required. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered in full.
WR-APL-005	Comments noted the cost of the Scheme, funding and where this money will come from.	The Applicant acknowledges comments regarding the cost effectiveness and profitability of the Scheme. However, it is important to clarify that the Scheme is a privately financed development. All financial risks associated with the construction, operation, and decommissioning of the Scheme are borne entirely by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full, including for the ongoing operation, maintenance, and eventual decommissioning.
WR-APL-006	Comments noted the BESS' Gate 1 status, the implications of this and asked for an explanation of this process with NESO / Ofgem.	As set out in the **Grid Connection Statement [APP-207REP1-072]**, the Applicant confirms that it has received notification of a Gate Two, Phase One offer for the solar element of the Scheme. Whilst a Gate One notification has been received for the BESS element, it is fully

ID	Summary of Representation	Applicant's Response
		anticipated that, should the Scheme receive consent, co-located technologies will be prioritised and the Gate offer for the BESS would be upgraded or improved. This expectation is supported by the Applicant's other consented projects, the Cottam Solar Project and the West Burton Solar Project, both of which received Gate Two offers for solar and BESS at the time of notifications in November 2025 due to their earlier DCOs being granted. The Applicant notes that further rounds of notifications are anticipated, which are expected to reflect advances in project timelines across the network. The Applicant clarifies that Gate offers are only granted to parties that have secured a grid connection with National Grid, as set out in the **Grid Connection Statement [APP-207REP1-072]**. The Applicant therefore has a secured connection for both elements of the Scheme.
WR-APL-007	Comments noted concern that the Applicant could become bankrupt before the Scheme is decommissioned.	The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Applicant notes that Island Green Power is in the process of discharging the requirements necessary to commence the West Burton Solar Project. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the DCO will remain bound by the legally enforceable requirements of the DCO. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and the delivery of the Scheme in full can be adequately funded. The **Draft DCO [REP1-014]** secures a Requirement for decommissioning and restoration to ensure that the Scheme, apart from the National Grid Substation and the Grid Connection

ID	Summary of Representation	Applicant's Response
		Infrastructure which will remain in-situ, is decommissioned at the end of the 60-year operational lifetime.
WR-APL-008	Comments asked about a decommissioning bond, which would set aside funding for decommissioning at the end of the Scheme's lifecycle. Other comments noted whether this would be funded by the taxpayer. Some comments requested financial security, clear timescales and identification of impacts in advance of decommissioning commencing.	The Applicant notes the concerns raised. Requirement 21 of the **Draft DCO [REP1-014]** secures the decommissioning and restoration of the Scheme, apart from the National Grid Substation and Grid Connection Infrastructure, at the end of the 60-year operational period. The obligation would sit with the owner of the Scheme at the time of decommissioning and would continue to apply notwithstanding any future transfer of ownership. Failure to comply with the relevant DCO Requirement constitutes a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary. The Scheme is a privately financed development. All financial risks associated with the construction, operation, and decommissioning of the Scheme are borne entirely by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. A detailed Decommissioning Environmental Management Plan must be prepared substantially in accordance with the **Outline DEMP [REP1-062]** and approved by the relevant planning authority before decommissioning commences. This would include the timetable and

ID	Summary of Representation	Applicant's Response
		detailed approach to removal, restoration and infrastructure proposed to remain. The Applicant's current position is that the solar generating infrastructure, BESS and Project Substations would be removed, with tracks and affected land restored as far as practicable. The treatment of buried cables would reflect government policy and good practice at the time. The National Grid Substation and Grid Connection Infrastructure would remain in situ, together with associated planting managed by National Grid Electricity Transmission. The Scheme is privately financed and the financial risks associated with its decommissioning are borne by the developer. Agreements with landowners include decommissioning securities covering breach or insolvency, with the amount regularly revalued and topped up where necessary. The Applicant does not consider that a separate DCO requirement for a ring-fenced decommissioning fund is necessary or reasonable.
WR-APL-009	Comments requested that the ExA recommend refusal of the Scheme's DCO.	As set out in the **Planning Statement [REP1-074]**, having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The **Policy Compliance Document [REP1-076]** further demonstrates the Scheme's compliance with the relevant NPS.
WR-APL-010	Comments noted concern that no compensation existed for homeowners and landowners.	The Applicant's **Book of Reference [REP1-018]** includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation

ID	Summary of Representation	Applicant's Response
		for any diminution in value due to physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
WR-APL-011	Comments supported Block East Pye Solar's objections and Examination submissions.	The Applicant's detailed response to comments made by Block East Pye Solar can be found in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-APL-012	Comments raised concern regarding the alleged lobbying of DESNZ on behalf the Applicant and Macquarie.	The Applicant does not agree that the matters raised give rise to an appearance of bias in the determination of the Application and the nature of the Scheme's grid connection. No evidence has been provided that the meeting concerned the merits of the Scheme's Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment. A meeting in January 2025 between DESNZ officials, the Applicant and Macquarie took place in the context of the Department of Energy Security and Net Zero's (DESNZ) wider policy and delivery responsibilities relating to electricity network infrastructure and the connection of solar and BESS projects to the transmission system. Engagement between DESNZ officials, the Applicant and Macquarie on grid connection matters is consistent with the wider engagement that routinely takes place between government departments, developers, investors, network operators, and other stakeholders in relation to electricity network connections and reform, and does not in itself indicate bias, predetermination or preferential treatment.

ID	Summary of Representation	Applicant's Response
		The Applicant notes that the assertions made in this Written Representation regarding the meeting are speculative and are not supported by evidence of bias. NESO has also commented publicly: "*NESO rejects any suggestion that its independent analysis or advice has been influenced by any individual developer. We engage regularly with stakeholders across the energy sector, but that engagement does not unduly influence NESO's objective advice or assessments*". The Planning Act 2008 process includes safeguards intended to ensure that applications for development consent are considered fairly and on the basis of the evidence before the decision maker. The grid connection for the Scheme, including its connection date, secured agreement and timelines are contained within the **Grid Connection Statement [APP-207REP1-072]**.
WR-APL-013	Comments noted the speed in which the application is going through the planning process.	The development timeline is governed by strict statutory requirements of the Planning Act 2008 for NSIP. Prior to submitting the Scheme, the Applicant has spent a substantial period within the pre-application stage undertaking environmental surveys, environmental assessment and an iterative design evolution process, together with Non-Statutory, Statutory Consultation and Targeted Consultation. This application process has given local communities, parish councils and statutory consultees windows to view and comment on the Scheme. Feeback received during these consultations has been formally reviewed and influenced the application documents.

3.5 Scheme Description, Draft DCO and Principles, Parameters and Commitments

Table 3.5 Scheme Description, Draft DCO and Principles, Parameters and Commitments

ID	Summary of Representation	Applicant's Response
WR-SCH-001	Comments objected to description of Great Moulton and Tivetshall as the "southern cluster".	Within the **ES [APP-036** to **APP-195]**, the assessments consider the likely significant effects on these local communities, where appropriate, within these villages and on specific properties. Within the ES, the assessment of likely significant effects is undertaken at the level of individual receptors where appropriate, including specific villages and properties. For example, the Landscape and Visual Assessment assesses effects on individual settlements and representative viewpoints, whilst the Cultural Heritage assessment considers effects on designated and non-designated heritage assets. The use of the term "Southern Cluster" is therefore a geographical descriptor only and does not alter the assessment of impacts on individual receptors. It is of the Applicant's view that the assessments within the ES clearly define the likely significant effects on the receptors assessed. This includes an assessment on the landscape character in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**.
WR-SCH-002	Comments disagreeing with the Scheme being described as "temporary."	The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years. This is secured by Requirement 21 in Schedule 2 of the **Draft DCO [REP1-014]**. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the

ID	Summary of Representation	Applicant's Response
		landowner, as set out in the **Outline DEMP [REP1-062]**. Post-decommissioning, the landowners would choose how the land is to be used and managed. The temporary nature of the Scheme has been reflected throughout the **ES [APP-036 to APP-195]**, including in assessments of landscape and visual effects, cultural heritage and agricultural land, where consideration has been given to the decommissioning and restoration of the Site at the end of the operational period. The Scheme is therefore distinguished from forms of development that would result in a permanent change in land use.
WR-SCH-003	Comments objected to the 60-year operational life of the Scheme.	The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years, which is secured by Requirement 21 in Schedule 2 of the **Draft DCO [REP1-014]**. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the **Outline DEMP [REP1-062]**. The likely significant effects of the Scheme are identified in the **ES [APP-036** to **APP-195]**, which identifies the nature of the effects. The temporary nature of the Scheme has been reflected throughout the **ES [APP-036 to APP-195]**, including in assessments of landscape and visual effects, cultural heritage and agricultural land, where consideration has been given to the decommissioning and restoration of the Site at the end of the operational period. The Scheme is therefore distinguished from forms of development that would result in a permanent change in land use.

ID	Summary of Representation	Applicant's Response
WR-SCH-004	Comments noted that there is no confirmation or agreed design of the Point of Connection with National Grid.	Pursuant to the terms of its current accepted offer, the Applicant is contracted to identify and provide the land and gain consent for the proposed new National Grid Substation. This has therefore been included as part of the DCO Application. The provisions relating to the Benefit of the Order have been drafted suitably to allow National Grid Electricity Transmission Plc (NGET) to deliver works relating to the NGET substation (see Article 36(2)). This approach is to give certainty of delivery in accordance with the existing connection agreement. The **Works Plan [REP1-005 and REP1-006]** and **Design Principles, Parameters and Commitments [REP1-078]** set out the maximum parameters and commitments for the National Grid Substation. Requirement 5 of the **Draft DCO [REP1-014]** requires details of the National Grid Substation to be submitted to and approved by the relevant planning authority, in accordance with the **Design Principles, Parameters and Commitments [REP1-078]**. Alternatively, National Grid Electricity Transmission could submit a planning application outside the DCO though the Town and Country Planning Act, for the new National Grid Substation. As explained in **ES Volume 1, Chapter 2 - EIA Methodology [APP-038]**, the EIA is based on the 'Rochdale Envelope' approach, which is in accordance with the Planning Inspectorate (2018) Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope, and involves assessing the worst-case scenario. The worst-case scenario has been defined by the maximum design parameters assessed within the ES and secured through the **Design Principles, Parameters and Commitments [REP1-078]**, with these parameters informing the topic-specific assessments contained within the **ES [APP-036** to

ID	Summary of Representation	Applicant's Response
		APP-195]. The National Grid Substation has been fully assessed within the **ES [APP-036** to **APP-195]** following this approach**.**
WR-SCH-005	Comments noted that the Applicant's relies on the 'detailed design stage' to make decisions about the Scheme. Comments stated that the design of the Scheme is unclear and not enough information is available to inform residents about the impacts of the Scheme.	The **Design Principles, Parameters and Commitments [REP1-078]** set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the **Works Plan [REP1-005** and **REP1-006]**. The Scheme has Work Nos as described in Schedule 1 of the **Draft DCO [REP1-014]** and does not have a detailed design at this stage. Requirement 5 of the **Draft DCO [REP1-014]** requires details to be submitted to and approved by the relevant planning authority, in accordance with the **Design Principles, Parameters and Commitments [REP1-078]**. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and a worst-case scenario. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered. The Rochdale Envelope approach is well established for solar DCO projects, recognising that certain aspects of the detailed design and construction methodology are appropriately refined post-consent whilst ensuring that the likely significant environmental effects are assessed on a robust worst-case basis.

ID	Summary of Representation	Applicant's Response
		The proposed management and mitigation measures set out in the **ES [APP-036** to **APP-195]** and are secured through various outline management plans **[REP1-058 to REP1-070]**. The specificity of the outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**.
WR-SCH-006	Comments noted concern regarding the increase in size of the Project Substation in Site 1 during the targeted consultation.	During design evolution, the Project Substation located in Sub-Site 1B was upgraded from a 132kV to 400kV Project Substation. This strategic upgrade removes the need for an additional transformer at the Project Substation in the BESS Site, thereby reducing the requirement for AIL within the locality. This change simplifies the overall infrastructure and improves the efficiency and environmental footprint of the project. This change was consulted on during the Targeted Consultation in Autumn 2025. Further details of the Targeted Consultation can be found in the **Consultation Report [APP-024]** and **Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]**. The parameters of the 400kV Project Substation are set out in the **Design Principles, Parameters and Commitments [REP1-078]** and assessed as part of the Scheme within the **ES [APP-036** to **APP-195]**. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features; and where appropriate

ID	Summary of Representation	Applicant's Response
		introduction of new landscape measures to support landscape integration and visual screening of the Scheme. These measures are set out in the **Design Approach Document [APP-212],** the **Green Infrastructure Strategy [AS-005]** and the **Outline LEMP [REP1-065],** with minimum offsets to retained trees and hedgerows secured through the **Design Principles, Parameters and Commitments [REP1-078**]. The implementation, management and monitoring of the landscape measures during construction and operation is secured through the **Outline LEMP [REP1-065]** by a Requirement in the **Draft DCO [REP1-014].**
WR-SCH-007	Comments requested more information about buffer zones, and how these vary across different Sites.	The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design. The minimum offset distances that will be applied to residential properties are secured through the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005]**. This includes a minimum of 50m from the curtilage of residential properties for the solar PV areas, Project Substations and National Grid Substation with a 200m buffer included for the BESS Enclosure. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through Requirement 7 in the **Draft DCO [REP1-014]**.

ID	Summary of Representation	Applicant's Response
		A visual amenity assessment on residential properties in **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [REP1-046]**. No properties were found to meet the Residential Visual Amenity Threshold.
WR-SCH-008	Respondents requested a minimum buffer zone of 250m from residential properties.	<u>Effects on Residential Visual Amenity</u> The Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in **ES Volume 2, Appendix 7.8 - Residential Visual Amenity Assessment [REP1-046]**. The RVAA has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). The purpose of an RVAA is not to identify all properties from which the development may be visible, nor to assess general visual effects experienced by residents. Rather, it is intended to determine whether the scale and proximity of a development would result in residential visual amenity being affected to such an extent that the property would become an unattractive place in which to live, through effects described as visually overbearing, overwhelming or oppressive. The Applicant's RVAA adopted a 100m study area from the Scheme element parameters, reflecting the proximity within which visually overbearing, overwhelming or oppressive effects are most likely to occur. The assessment concluded that no residential properties within the defined study area would experience visual effects of such magnitude that they would become unattractive places in which to live.

ID	Summary of Representation	Applicant's Response
		The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design. In accordance with the mitigation hierarchy, avoidance measures embedded in the design include exclusion of Solar PV Arrays from areas in proximity to residential properties, and the application of design offsets (a minimum 50m offset from the curtilage of residential properties, applied on a case-by-case basis). These minimum offsets are set secured through the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005 and REP1-006]** by way of Requirement 5 of the **Draft DCO [REP1-014]**.
WR-SCH-009	Comments noted the evolution of the Scheme's design and stated that local communities have not had a chance to comment on design changes.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the EIA Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly with the Applicant. The acceptance of the Applicant's application for Examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. This process included a thorough assessment of the **Consultation**

ID	Summary of Representation	Applicant's Response
		Report [APP-024], which details the Applicant's approach to pre-application consultation. The Applicant also notes that the Examination process provides a further opportunity for interested parties to comment on the Scheme. This Examination is managed by an independently appointed Examining Authority.
WR-SCH-010	Comments included requests for specific quantities, scale and permanence of substations and other authorised infrastructure. Other comments requested a consistent scheme description with clear maximum parameters, phasing and recovery obligations.	The Applicant notes the concerns raised. The Applicant confirms that the authorised development and maximum parameters are described in **ES Volume 1, Chapter 4 - The Scheme [REP1-022]**, Schedule 1 of the **Draft DCO [REP1-014]** and the **Design Principles, Parameters and Commitments [REP1-078],**detailed design must remain within those parameters. As set out in the application documents, is that the Scheme comprises a solar PV generating station and associated development including up to three 132kV Project Substations, up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation, within the parameters assessed in the Environmental Statement and secured through the **Draft DCO [REP1-014]**. Apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned following the operational period. The National Grid Substation has been assessed as permanent infrastructure and would remain in situ. Decommissioning is assessed in the **ES [APP-036 to APP-195]** and controlled through the **Outline DEMP [APP-198]** and the relevant Requirement of the **Draft DCO [REP1-014].** including preparation and approval of a detailed DEMP prior to decommissioning. The Outline DEMP provides for the remainder

ID	Summary of Representation	Applicant's Response
		of the Scheme to be removed and land restored to its previous agricultural use as far as practicable.

3.6 EIA Methodology and Commitments Register

Table 3.6 EIA Methodology and Commitments Register

ID	Comments/Issues Raised	Applicant's Response
WR-EIA-001	Comments noted that assessments were primarily 'desk-based' and raised concerns regarding the professional judgement of the Applicant's team.	The Applicant disagrees that the team undertaking the environmental assessments are biased. The **ES [APP-036** to **APP-195]** and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]**. The **ES [APP-036** to **APP-195]** has been informed by the relevant surveys conducted in situ, with further surveys secured through the outline management plans **[REP1-058 to REP1-070]**.
WR-EIA-002	Comments raised concern about surveys taking place after the DCO application had been submitted.	Surveys have been undertaken following submission for a number of reasons including surveys commissioned in light of feedback received on the application. This is common practice in the DCO process and the **ES [APP-036** to **APP-195]** will be updated as necessary throughout the examination process to ensure it reflects the findings of the surveys.
WR-EIA-003	Comments noted that the Applicant has only presented assessments regarding individual receptors, rather than a combined one.	The assessments within the **ES [APP-036** to **APP-195]** has considered all components of the Scheme as a whole, including the National Grid Substation and Grid Connection Infrastructure, the Project Substations and the BESS, together with the Solar PV Arrays and **Green Infrastructure Strategy [REP1-013]**.

ID	Comments/Issues Raised	Applicant's Response
		ES Volume 1, Chapter 19 – In-combination Effects Assessment [APP-055] *'presents a summary of the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics.'*
WR-EIA-004	Comments stated that impacts of the Scheme cannot be mitigated against. Comments noted that the Scheme would result in significant adverse effects across various issues, such as agricultural land, landscape and visual, ecology and biodiversity and transport and access.	The site selection process is described in the **Site Selection Assessment [APP-215]** which sets out the suitability of the selected Sites against key environmental, planning, and technical criteria informed by NPS EN-3, and considers potential alternatives. The Applicant acknowledges that there will be some unavoidable impacts on the environment as a result of the Scheme. The Applicant has assessed the likely significant effects of the Scheme in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum, and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.
WR-EIA-005	Comments objected to the description of people as receptors.	The **ES [APP-036** to **APP-195]** provides a full environmental assessment in accordance with relevant legislation and guidance. The terminology used within the ES is dictated by the EIA Regulations and best practice guidance and methodologies, and

ID	Comments/Issues Raised	Applicant's Response
		do not serve to de-humanise effects but rather ensure that effects are assessed comprehensively and accurately.

3.7 Construction and Decommissioning

Table 3.7 Construction and Decommissioning

ID	Comments/Issues Raised	Applicant's Response
WR-C&D-001	Comments raised concern about whether the Applicant will comply with the Requirements set out in the DCO.	The Applicant confirms that the DCO incorporates enforceable mechanisms to regulate Scheme delivery. Failure to comply with a DCO Requirement is a criminal offence.
WR-C&D-002	Comments noted concern about the construction phase of the Scheme.	The likely significant effects of the Scheme during the construction phase are assessed in the **ES [APP-036** to **APP-195]**, including effects on transport and access, noise and vibration, air quality, water environment, landscape and visual, heritage, ecology and biodiversity, and local communities. The proposed management and mitigation measures set out in the **ES [APP-036** to **APP-195]** Mitigation and management measures are secured through the **Outline CEMP [APP-196]**, **Outline CTMP [APP-201]** and **Outline PRoWPPMP [APP-203]**, addressing matters including construction traffic, noise, dust, environmental effects and access. Detailed management plans will be submitted to and approved by the relevant planning authority in accordance with the **Draft DCO [REP1-014]**. The outline management plans **[**are designed with the objective of securing the relevant environmental mitigation measures set out within the ES. The residual significant effects identified in the ES are principally limited to landscape and visual effects, together with a significant effect relating to BMV agricultural land during construction, whilst a range of beneficial effects are identified in relation to climate

ID	Comments/Issues Raised	Applicant's Response
		change, ecology and biodiversity, water environment and socio-economics. The Scheme incorporates extensive embedded and additional mitigation, including landscape planting, habitat creation and enhancement, drainage and construction management measures, all of which are secured through the **Draft DCO [REP1-014]** and associated management plans. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the **Draft DCO [REP1-014]**. These detailed management plans will be submitted to and approved by the relevant planning authority.
WR-C&D-003	Comments noted concern about the construction of the Cable Route Corridor.	The environmental considerations and refinement of the cable route is summarised in the **Design Approach Document [APP-212]**. The construction of the cable route has been assessed in the **ES [APP-036** to **APP-195]** with the minimum and maximum parameters set out in the **Design Principles, Parameters and Commitments [REP1-078]** to ensure that a reasonable worst-case scenario has been assessed. Construction works in CRC would be temporary in nature. Once the cable has been laid underground, the land will be reinstated and soils restored to the previous condition (as set out in the **Outline SRMP [APP-204]**), allowing for activities such as farming to continue. The detailed design and construction of the cable route will be undertaken within the parameters authorised by the DCO. Measures to manage and minimise construction effects are set out in the **Outline CEMP [REP1-058]** and the **Outline SRMP [APP-204]**.

ID	Comments/Issues Raised	Applicant's Response
WR-C&D-004	Comments noted concern about the impact of the decommissioning phase. Comments stated that the Scheme would be permanent and would not return to agricultural use. Some comments noted questions about the decommissioning process.	Except for the National Grid Substation and Grid Connection Infrastructure as they will be owned and operated by National Grid, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years. This is secured by Requirement 21 in Schedule 2 of the **Draft DCO [REP1-014]**. As described in in the **Outline DEMP [REP1-062]** post-decommissioning, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is anticipated that some areas of habitat and biodiversity mitigation and enhancement within the Sites may be left in-situ given they could contain protected species and so relevant licences at the time would to be obtained for any changes. The decommissioning of the Scheme has been assessed in the **ES [APP-036** to **APP-195]**, which also identifies mitigation measures which are secured by in the **Outline DEMP [REP1-062]**. The **Outline DEMP [REP1-062]** is designed with the objective of securing the relevant environmental mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the detailed DEMP. A detailed DEMP will be prepared substantially in accordance with the **Outline DEMP [REP1-062]** and must be submitted to and approved by the relevant planning authority prior to the commencement of decommissioning. This is secured through Requirement 21 in Schedule 2 of the **Draft DCO [REP1-014]**. The Applicant confirms that the DCO incorporates enforceable mechanisms to regulate Scheme delivery. Failure to comply with a DCO Requirement is a criminal offence.

ID	Comments/Issues Raised	Applicant's Response
		The Applicant may consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker as defined in the **Draft DCO [REP1-014]** will remain bound by the legally enforceable requirements in the DCO. The Applicant confirms that none of the land for solar development is brownfield after decommissioning as the land will be reinstated and soils restored to the previous condition. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
WR-C&D-005	Comments noted concern about the operational phase of the Scheme.	The operation (and maintenance) of the Scheme has been assessed in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. The framework for managing environmental effects during the operational phase of the Scheme is set out in the **Outline OEMP [REP1-060]**, the **Outline OTMP [APP-202]**, the **Outline BSMP [REP1-066]**, the **Outline LEMP [REP1-064]** and **the Outline PRoWPPMP [APP-203]**. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the **Draft DCO [REP1-014]**. These detailed management plans will be submitted to and approved by the relevant planning authority.

ID	Comments/Issues Raised	Applicant's Response
WR-C&D-006	Comments referred to construction working times, stating that these should be restricted to 8am to 5pm on weekdays.	The **Outline CEMP [REP1-058]** and the **Outline CTMP [REP1-068]** sets out the core working hours (excluding start-up and shut down works) as follows: • Monday to Friday from 07:00 to 18:00 (daylight hours permitting); • Saturday from 08:00 to 13:30 (daylight hours permitting); and • No Sunday or Bank Holiday working unless crucial to construction (for example, for trenchless crossings which must be continuous activity and the arrival and departures of workers and the delivery of Abnormal Indivisible Loads) or in an emergency. These core working hours are broadly consistent with those typically applied to NSIPs. The final construction working hours will be agreed with the relevant planning authority through the detailed CEMP, which must be substantially in accordance with the **Outline CEMP [REP1-058]**, as secured by the **Draft DCO [REP1-014]**. Where practicable, construction deliveries will be co-ordinated to avoid HGV movements during the traditional network peak morning (08:00 to 09:00) and peak afternoon (17:00 to 18:00) hours. Some activities may be required outside of these times such as the delivery of AIL, concrete pours for foundations, night working for cable construction works in public highways and/or trenchless crossing activities. A Vehicle Booking Management System will be implemented to co-ordinate vehicle movements, as set out in the **Outline CTMP [REP1-068]**.

ID	Comments/Issues Raised	Applicant's Response
WR-C&D-007	Comments raised concern regarding the use of temporary construction compounds.	The likely significant effects of the Scheme during the construction phase are assessed in the **ES [APP-036** to **APP-195]**, including the locations of the temporary construction compounds. Mitigation measures for the construction activities, including in relation to the temporary construction compounds, where relevant, are identified and secured in the **Outline CEMP [REP1-058]** and **Outline CTMP [REP1-068]**. **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]** summarises the mitigation in throughout **ES [APP-036** to **APP-195]**. Detailed CEMP and detailed CTMP will be prepared substantially in accordance with the **Outline CEMP [REP1-058]** and **Outline CTMP [REP1-068]**. These must be submitted to and approved by the relevant planning authority prior to the commencement of operation. These requirements are secured through Requirements 13 and 15, respectively, of the **Draft DCO [REP1-014]**.
WR-C&D-008	Comments noted that there is insufficient detail about drainage, soil handling, dust control, biosecurity and decommissioning in the OLEMP. Other comments contained requests for an Agricultural Liaison Officer.	The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** are comprehensive and robust. The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** and are secured through various outline management plans **[REP1-058 to REP1-070]**. Of particular relevance, the **Outline SRMP [APP-204]** sets out soil handling and management measures and specifies that an Agricultural Liaison Officer who will act as a liaison between the landowners and the contractor. The **Outline LEMP [REP1-064]** includes management and enhancement measures for hedgerows and management measures for invasive pests, species and diseases. The **Outline CEMP [REP1-058]** includes measures relating to drainage, dewatering, and dust control.

ID	Comments/Issues Raised	Applicant's Response
		Decommissioning phase mitigation and control measures are secured through the **Outline DEMP [REP1-062]**. The specificity of the outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**.
WR-C&D-009	Comments refer to alternative construction techniques, such as trenchless construction methods (HDD).	As set out within the **Outline Cable Route Construction Statement [REP1-080]**, a number of Avoidance Areas have been identified, where trenchless construction methods will be used to avoid direct impacts. The non-intrusive installation methods may comprise a number of trenchless techniques. Any works relating to trenchless crossing activities will be undertaken in line with a Method Statement, with the relevant commitments secured via the **Outline CEMP [REP1-058]**. Accordingly, the use of trenchless construction methods has been considered as part of the Applicant's approach to avoiding and reducing environmental impacts and the need for permanent land take.
WR-C&D-010	Comments noted that the Applicant has not produced an operational maintenance plan for the BESS.	The **Outline BSMP [REP1-066]** outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The **Outline BSMP [REP1-066]** identifies how the Applicant will use good industry practice to reduce risk to life, property and the environment from the BESS. By way of a Requirement 6 of the **Draft DCO [REP1-014]** prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the

ID	Comments/Issues Raised	Applicant's Response
		relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the Environment Agency. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.
WR-C&D-011	Comments objected to the description of the construction period as 'short term'.	The construction of the Scheme is anticipated to commence in 2028 and continue for a period of approximately 24 months, as set out in **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. The Applicant acknowledges that a 24-month construction period is not negligible. However, in the context of the Scheme's 60-year operational lifetime and the temporal scope defined in **ES Volume 1, Chapter 2 – EIA Methodology [APP-037]**, construction effects are appropriately characterised as temporary, in that they are limited to the duration of the works and cease upon completion. Accordingly, the characterisation of construction effects as temporary does not imply that the duration of construction is insignificant, but reflects their time-limited nature in comparison with the long-term operational phase of the Scheme.
WR-C&D-012	Comments raised concern regarding personal safety of residents during the construction phase.	The Applicant can confirm the welfare areas and temporary construction compounds will be kept secure. A Community Liaison Group will be set up as set out in the **Outline CEMP [REP1-058]**. A Community Liaison Manager will be appointed to lead discussions with local communities and also act as the primary point of contact should there be any queries or complaints. Engagement and communication activities will be managed in accordance with a Stakeholder Communications Plan.

ID	Comments/Issues Raised	Applicant's Response
		With specific regard to community liaison, this is directly secured through Requirement 4 of the **Draft DCO [REP1-014]** through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
WR-C&D-013	Comments raised concern about statutory nuisance and the ability to have quiet enjoyment of their home during the construction phase.	The likely significant effects of the Scheme on nearby residential proprieties have been assessed in the **ES [APP-036** to **APP-195]**, including effects on noise and vibration, landscape and visual amenity, air quality, transport and access, and human health and wellbeing. The proposed management and mitigation measures set out in the **ES [APP-036** to **APP-195]** and are secured through various outline management plans **[REP1-058 to REP1-070]**. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out **in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047]**, **Chapter 12 – Noise and Vibration [APP-048]**, **Chapter 13 – Air Quality [APP-049]**, **Chapter 14 - Socio-Economics [APP-050],** and **Chapter 18 - Other Environmental Matters [APP-054]**. These outline measures taken to reduce, mitigate and minimise these effects as far as possible. The management plans will ensure appropriate mitigation and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
		The potential for statutory nuisance has been assessed in the **Statutory Nuisance Statement [APP-208]** which concluded that the construction, operation (and maintenance), and decommissioning phases of the project will not give rise to impacts from the site condition which would constitute a statutory nuisance under Section 79(1) (g) or (ga) of the EPA.

3.8 Site Selection, Alternatives and Design Evolution

Table 3.8 Site Selection, Alternatives and Design Evolution

ID	Comments/Issues Raised	Applicant's Response
WR-ALT-001	Comments referred to preferences for alternative forms of energy production, including other renewable and non-renewable sources.	Solar is a proven technology and the **Statement of Need [APP-206]** provides evidence on the substantial benefits brought forward by large-scale ground mounted solar electricity generation generally. The Scheme is a viable proposal to use proven technology with short development timescales, thereby delivering dependable decarbonisation benefits. The **Applicant's Statement of Need [APP-206]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The Applicant agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets. Table 2.1 of the **Statement of Need [APP-206]** demonstrates that the government is seeking to support significant capacities of all low-carbon generation technologies to come forwards to achieve Clean Power on the way to Net Zero by 2050. Schemes of other technologies cannot therefore be considered as an alternative to the Scheme, because those other schemes are also needed.

ID	Comments/Issues Raised	Applicant's Response
		However, the **Statement of Need [APP-206]** provides evidence in relation to the capacities of main categories of renewable generation technologies tasked to support the delivery of a low carbon and secure electricity system. While the need for unprecedented capacity growth is urgent, some technologies (e.g. nuclear, SMRs, tidal) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in NPS EN-1). Yet, to address the ongoing climate emergency, it is critical that the UK urgently develops a large capacity of low carbon generation.
WR-ALT-002	Comments noted that the Applicant has not justified the need for the Scheme in this location.	Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]** which provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The Government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission (NPS EN-3 (2025) Paras 2.10.1 & 2.10.2). Factors considered in the site selection process is given in the **Site Selection Assessment [APP-215]**, including both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The site selection process considered different potential development areas and alternative development zones for the Scheme and presents how each of those areas perform against a number of factors.

ID	Comments/Issues Raised	Applicant's Response
		The Applicant has made furthers submissions in respect of Site Selection in **The Applicant' s Response to the Examining Authority's First Written Questions [REP1-083]**, Q1.3.1 and Q1.3.2.
WR-ALT-003	Comments objected to the location of the Scheme, with some noting that it is in the wrong location.	Factors considered in the site selection process are summarised in the **Site Selection Assessment [APP-215]**. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The **Site Selection Assessment [APP-215]** sets out the consideration of a number of alternative locations for the new National Grid Substation. The Site Selection Assessment further considers potential alternatives for the solar Sites for the Scheme, with consideration of potential non-BMV land as identified by the Provisional mapping. The **Statement of Need [APP-206]** provides evidence to support the suitability of the proposed location of the Scheme in relation to transmission network regional capacity, electricity networks, grid suitability and connection points. It concludes that the location of the Scheme is well suited to support the UK's energy needs and that the proposed connection point is appropriate. In relation to proximity to residential properties, schools and villages, minimum offset distances that will be applied to

ID	Comments/Issues Raised	Applicant's Response
		ecological and landscape features, together with residential properties, are secured through the **Design Principles, Parameters and Commitments [REP1-078]** and the **Works Plan [REP1-005]**. These have taken into account best practice, feedback during consultation and site-specific environmental conditions informed by surveys and the environmental assessment process. As described in the **Design Approach Document [APP-212]**, the design evolution of the Scheme has taken into consideration proximity to residential and other sensitive receptors, with Solar PV Arrays removed or reduced in several locations to respond to feedback received during consultation. Mitigation measures to reduce impacts on nearby residents, schools and villages during the construction and operational phases of the Scheme are set out in the various outline management plans **[REP1-058 to REP1-070]**. The availability of a grid connection is a key consideration on the location of solar sites. As set out within the **Site Selection Assessment [APP-215],** a suitable Point of Connection has been identified at the proposed National Grid Substation. The Sites identified as being suitable are within 20km of the Point of Connection and the Scheme has been designed to make efficient use of the available grid capacity. Previously developed land, including brownfield land, was considered during site selection, as reported in the **Site Selection Assessment [APP-215]**. As set out in the **Statement of Need [APP-206]**, while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains

ID	Comments/Issues Raised	Applicant's Response
		necessary in addition to, not instead of, rooftop solar and development on previously developed land. During the design evolution of the Scheme, consideration was given to reducing the impact on BMV quality land, as far as practicable, as described in the **Design Approach Document [APP-212].**
WR-ALT-004	Comments described the Scheme as too fragmented and spread out. Other comments noted that the Scheme shouldn't be treated as one DCO project, but rather smaller TCPA projects.	The Scheme has been designed to deliver the greatest practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The Applicant has outlined its approach to site selection and the considerations made in the **Site Selection Assessment [APP-215]**. As set out within the **Site Selection Assessment [APP-215]**, the Applicant searched for an area of approximately 1,100ha to accommodate solar panels for a 500MW grid connection. The Applicant considered a range of planning, environmental and technical factors. A search was undertaken to identify sites within for which there were potentially willing landowners. Further, the **Statement of Need [APP-206]** explains that proposals may comprise adjoining parcels of land or separate parcels of land which do not border each other but instead combine to an integrated Scheme which is more dispersed within a countryside setting. Further, the connection of separate parcels of suitable land together into a single Scheme may, subject to analysis, enable those parcels of land to connect appropriately to the electricity system, whereas if developed as stand-alone projects they may not be able to carry the associated costs of connection and therefore may never be developed. The Applicant does not agree that the Scheme should be treated as separate projects. The Scheme comprises a single integrated

ID	Comments/Issues Raised	Applicant's Response
		NSIP, including the solar PV arrays, Battery Energy Storage System, substations, National Grid Substation and Grid Connection Infrastructure, which collectively function to generate, store and export electricity to the national transmission network. The Scheme has therefore appropriately been assessed and applied for as a single project for the purposes of the DCO Application and Environmental Impact Assessment.
WR-ALT-005	Comments raised concern about the location of the National Grid Substation.	The Applicant's approach to the site selection of the National Grid Substation is set out within the **Site Selection Assessment [APP-215],** which had regard to the Holford and Horlock Rules. The **Design Approach Document [APP-212]** further sets out the refinement of the location of the National Grid Substation from the options presented at Statutory Consultation. These documents described the reasonable alternative site options considered for the National Grid Substation. The **Works Plan [REP1-005]** and **Design Principles, Parameters and Commitments [REP1-078]** set out the maximum parameters and commitments for the National Grid Substation and, as explained in **ES Volume 1, Chapter 2 - Environmental Impact Assessment Methodology [APP-038]**, the EIA is based on the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate (2018) Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope, to assess the worst case scenario.
WR-ALT-006	Comments noted that the location of the Scheme was made on a commercial basis.	As detailed in the **Site Selection Assessment [APP-215]**, the Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors, including the availability of willing landowners to participate in the Scheme.

ID	Comments/Issues Raised	Applicant's Response
		Through discussions with National Grid Electricity Transmission, available capacity along the Bramford to Norwich 400kV overhead line was identified between Norwich and Diss. As set out in the **Site Selection Assessment [APP-215]**, the Point of Connection was originally considered from Norwich Main Substation. Following discussions with National Grid Electricity Transmission, it was determined that a Point of Connection at Norwich Main Substation would be unviable due to capacity constraints and that there is not an opportunity to expand this existing substation to accommodate a 500MW solar project. It was confirmed that an alternative Point of Connection would be required. The **Site Selection Assessment [APP-215]** sets out the reasonable alternative sites considered. The Applicant reaffirms its commitment to the provision of a Community Benefit Fund should the Scheme be consented. Information on the mechanics of the Community Benefit Fund and the areas to which it will contribute will be developed through consultation with South Norfolk Council and Norfolk County Council. The Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).
WR-ALT-007	Comments noted concern about the location of the cable route corridor.	The **Design Approach Document [APP-212]** sets out the key considerations to designing the CRC. The CRC was refined during the design evolution of the Scheme to take into account environmental constraints and technical requirements. This included keeping the route as short and direct as possible, using existing gaps in hedgerows and avoiding landscape and ecological features as far as practicable, for example.

ID	Comments/Issues Raised	Applicant's Response
		Construction works in the CRC would be temporary in nature. Once the cable has been laid underground, the land will be reinstated and soils restored to the previous condition (as set out in the **Outline SRMP [APP-204]**), allowing for activities such as farming to continue. Management and mitigation measures are secured through the various outline management plans **[REP1-058 to REP1-070]**. Detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**. The approval of the detailed management plans is secured by the Requirements in the **Draft DCO [REP1-014]**.
WR-ALT-008	Comments objected to the location of the BESS.	The BESS Site was selected on the basis of its proximity to the Point of Connection and access requirements, as detailed in the **Site Selection Assessment [APP-215].** Accessibility to the Strategic Road Network (SRN) is an important consideration for the location of the BESS. In addition, locating the BESS in proximity to the National Grid Substation has the benefit of minimising transmission losses, maximising storage efficiency, providing effective grid balancing and supporting a faster and more reliable reaction to power outages and disruptions.
WR-ALT-009	Comments stated that the location of the Scheme was primarily influenced by land availability and available grid connection.	The Applicant draws the respondent's attention to the Applicant's response to Q1.3.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**, submitted at Deadline 1, which provides a full response on this matter.

ID	Comments/Issues Raised	Applicant's Response
WR-ALT-010	Comments raised concern about the Applicant not sharing alternatives to the Cable Route Corridor.	The **Design Approach Document [APP-212]** sets out the key considerations to designing the CRC and the **Site Selection Assessment [APP-215]** sets out the reasonable alternative sites considered. The Applicant identified a wide CRC at the non-statutory consultation stage in autumn 2024. Further refinements (reductions and modifications to the routing) were made at the EIA scoping stage (February 2025); Statutory Consultation stage (August 2025); and Application submission stage (March 2026). The refinement of the CRC during the design evolution of the Scheme, has taken into account environmental constraints and technical requirements, including landscape and ecological features, existing access and utilities. This also included keeping the route as short and direct as possible. Construction works in CRC would be temporary in nature. Once the cable has been laid underground, the land will be reinstated and soils restored to the previous condition (as set out in the **Outline SRMP [APP-204]**), allowing for activities such as farming to continue. Management and mitigation measures are secured through the various outline management plans **[REP1-058 to REP1-070]**. Detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014]**. The approval of the detailed management plans is secured by the Requirements in the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
WR-ALT-011	Comments noted that the Applicant has not considered brown or grey field sites.	Previously developed land and rooftops have been considered within the **Site Selection Assessment [APP-215]**. As set out in the **Statement of Need [APP-206]**, while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop and smaller-scale solar.
WR-ALT-012	Comments noted that the Scheme would be suitably located on a brownfield site.	A review of brownfield sites is set out within the **Site Selection Assessment [APP-215],** which concludes that no suitable brownfield sites exist which are of a suitable size to host a 500MW solar farm. A review of the brownfield registers prepared by South Norfolk and Broadland District Council, Breckland Council, East Suffolk Council and Norwich City Council identified no suitable previously developed land within the area of search capable of accommodating the Scheme, as detailed in the **Site Selection Assessment [APP-215]**.
WR-ALT-013	Comments stated that the Applicant has not considered agricultural land, hydrology and ecological impacts when selecting the location of the Scheme.	The Applicant can confirm that there are no SSSI, Ancient Woodland, Scheduled Monuments, registered battlefields, listed buildings and Conservation Areas within the Order Limits. BMV land and flood risk was considered in the **Site Selection Assessment [APP-215]**. NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV quality land and that land type should not be a predominating factor in determining the suitability of the site location (paras 2.10.21 and 2.10.22). NPS EN-3 recognises that, at scale, developments may use some agricultural land (para 2.10.23).

ID	Comments/Issues Raised	Applicant's Response
		BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the **Site Selection Assessment [APP-215]**. Further, the Applicant has sought to minimise the use of BMV land through the design evolution process, as set out in the **Design Approach Document [APP-212]**. **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. During the design process, the Applicant has adopted a sequential approach to the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as practicable. The entirety of the built aspects of the Scheme is located in Flood Zone 1; however, electrical cabling, fencing, maintenance tracks, landscaping and biodiversity of the Scheme would encroach on Flood Zones 2 and 3. The Applicant considers that the Scheme meets the Sequential Test and Exception Test (as presented in the **Planning Statement [REP1-074]**). The Applicant has assessed the likely significant effects of the Scheme in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**.
WR-ALT-014	Comments objected to the location of the Project Substations.	The siting of the 400kV Project Substations has been informed by the location of the Solar PV Arrays and the need to efficiently collect and transform electricity for export. As explained in the

ID	Comments/Issues Raised	Applicant's Response
		Grid Connection Statement [REP1-072], a Project Substation at Site 5 will be used to collect the electricity generated from Sites 3, 4, 5, 7, 8, 9, and 10. Substations at the BESS site and Site 1 will be used to transform the power from the Sites 1, 2 and BESS to a voltage of up to 400kV. Locating the Project Substations in this manner minimises transmission losses and cable route lengths across the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features; and where appropriate introduction of new landscape measures to support landscape integration and visual screening of the Scheme.
WR-ALT-015	Comments noted that the environmental suitability of Great Moulton as a location for the Point of Connection was ignored.	The Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors, as detailed in the **Site Selection Assessment [APP-215]**. Land availability (i.e. the participation, or willingness of landowners) is a key consideration for site selection, as without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant is keen to avoid as far as practicable. Through discussions with National Grid Electricity Transmission, available capacity along the Bramford to Norwich 400kV overhead line was identified between Norwich and Diss. As set out in the **Site Selection Assessment [APP-215]**, the Point of Connection was originally considered from Norwich Main Substation. Following discussions with National Grid Electricity Transmission, it was determined that a Point of Connection at Norwich Main

ID	Comments/Issues Raised	Applicant's Response
		Substation would be unviable due to capacity constraints and that there is not an opportunity to expand this existing substation to accommodate a 500MW solar project. It was confirmed that an alternative Point of Connection would be required. The **Site Selection Assessment [APP-215]** sets out the reasonable alternative sites considered including at Great Moulton. In addition, the Applicants response to Q1.3.1 and Q1.3.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083],** addresses site selection including the choice of Great Moulton as a location for the Point of Connection to the grid.
WR-ALT-016	Comments included requests for the removal of Site 8.	Site 8 has been subject to an iterative design process, as set out within the **Design Approach Document [APP-212]**. In response to feedback from statutory consultation, several design changes were made to the extent of Solar PV Arrays in Site 8. Solar PV Arrays were removed from the northern and western parts of Sub-Site 8B, together with Solar PV Arrays removed from Sub-Site 8A in response to landscape and visual, heritage, flood risk and BMV land considerations. **Need** Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme, including Sub-Sites 8A and 8B). It is the Applicant's position that it would not be consistent with the Government's objectives to deliver a scheme which is smaller than that which has been

ID	Comments/Issues Raised	Applicant's Response
		assessed as acceptable on a planning basis. This point generally applies to WR-ALT-017 to WR-ALT-022 and is not repeated.
WR-ALT-017	Comments noted that there is no need for Site 4 and should be removed.	The Applicant refers to its response to WR-ALT-016 regarding the need for the Scheme.
WR-ALT-018	Comments included requests for the removal of Site 9.	See comment on Need at WR-ALT-016 above. Site 9 has been subject to an iterative design process, as set out within the **Design Approach Document [APP-212]**. In response to feedback from statutory consultation, Solar PV Arrays were removed from the western part of Site 9. The **Green Infrastructure Strategy [REP1-013]** includes measures to provide visual screening and support landscape integration of the Scheme. At Site 9 this includes a proposed linear tree belt along the northern boundary of the Site, and hedgerow enhancement and new planting within the Site and adjacent to the southern boundary. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through a Requirement in the **Draft DCO [REP1-014]**.
WR-ALT-019	Comments noted that Site 3 should be removed from the Scheme.	Site 3 has been subject to an iterative design process, as set out within the **Design Approach Document [APP-212]**. In response to feedback from statutory consultation, Sub-Site 3A was completely removed from the Order Limits. The Applicant has assessed the likely significant effects of the Scheme, including Site 3, in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these

ID	Comments/Issues Raised	Applicant's Response
		impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. The Applicant refers to its response to WR-ALT-016 regarding the need for the Scheme.
WR-ALT-020	Comments objected to Site 10.	Site 10 has been subject to an iterative design process, as set out within the **Design Approach Document [APP-212]**. During this process, Solar PV Arrays have been removed from parts of Site 10. The Applicant has assessed the likely significant effects of the Scheme, including Site 10, in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. The Applicant refers to its response to WR-ALT-016 regarding the need for the Scheme.
WR-ALT-021	Comments objected to the location of a Project Substation in Site 5.	The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features. The Project Substation is located centrally within Sub-Site 5A to maximise distance between visual receptors including residential receptors in the surrounding landscape.

ID	Comments/Issues Raised	Applicant's Response
		Furthermore, where appropriate introduction of new landscape measures is included to support landscape integration and visual screening of the Scheme. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening / reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration of new infrastructure. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through a Requirement in the **Draft DCO [REP1-014]**.
WR-ALT-022	Comments noted that there is no need for Site 7.	Site 7 has been subject to an iterative design process, as set out within the **Design Approach Document [APP-212]**. The Applicant has assessed the likely significant effects of the Scheme, including Site 7, in the **ES [APP-036** to **APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. The Applicant refers to its response to WR-ALT-016 regarding the need for the Scheme.

3.9 Climate Change and Greenhouse Gases

Table 3.9 Climate Change and Greenhouse Gases

ID	Comments/Issues Raised	Applicant's Response
WR-CLI-001	Comments noted ethical concerns about the manufacturing of solar panels and whether they will be ethically sourced. Other comments noted the carbon emissions associated with procuring materials from other countries.	The Applicant's parent company is a signatory of the Solar Energy UK Supply Chain Statement, which commits the company and its projects to sourcing materials produced in a sustainable way with a supply chain free of human rights abuses. It is building on this commitment through membership of the Solar Stewardship Initiative, an international supply chain audit programme, and by using independent international standards bodies to review, inspect and accredit suppliers. The Applicant follows UK Government guidance on the security of electrical and electronic equipment. Threats to solar developments are similar to those that can affect all industries and would be managed by robust cyber security processes to identify, prevent, and mitigate against, potential issues. The **Outline ESSCS [REP1-070]** sets out that international suppliers will be required to meet a minimum standard with regard to environmental standards, professional conduct and ethical working practices. Panels sold into the UK market must meet applicable standards and this would also be provided for in the Applicant's procurement contracts. The majority of solar panels are produced in China and meet high standards of quality, with external auditing to provide assurance to purchasers. While the solar panels would be sourced and shipped from China, UK manufacturers can supply many of the other components. **ES**

ID	Comments/Issues Raised	Applicant's Response
		Volume 1, Chapter 6 - Climate Change [APP-042] assesses the greenhouse gas emissions from the transport of materials for the Scheme. Whilst the manufacturer of solar panels has not yet been chosen, for the purposes of the assessment, it has been assumed on a precautionary basis that solar panels would be transported by sea from China to ensure a reasonable worst-case assessment.
WR-CLI-002	Comments noted scepticism towards net zero.	Climate change is recognised globally as a serious environmental threat by recognised experts, and actions to combat it are considered to be a Critical National Priority by the UK Government, as set out in the NPS. The legal requirement and policy context for the need for decarbonisation is explained in the **Statement of Need [APP-206]**. The assessment of greenhouse gas emissions in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** is based on standard methods and guidance, including from the Institute of Sustainability and Environmental Professionals.
WR-CLI-003	Comments noted concerns the carbon emissions associated with procuring materials from overseas.	The effects of emissions generated from embodied carbon within materials and components have been assessed in **ES Volume 1, Chapter 6 - Climate Change [APP-042]**. As set out in the **Planning Statement [REP1-074]**, the Scheme will help the UK to be on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply and providing low-cost electricity to meet the increasing demand. The overall greenhouse gas emissions impact of the operation of the Scheme is beneficial and significant.

ID	Comments/Issues Raised	Applicant's Response
WR-CLI-004	Comments included testimonials about the importance of climate change and renewable energy.	The Applicant notes the support for renewable energy. The Scheme would contribute substantially to the need for low carbon energy generation and the Government's objectives and commitments for pursuing a Clean Power energy system and cutting GHG emissions to net zero by 2050, as set out within NPS EN-1 Paragraph 2.3.3. By generating low carbon energy at a low marginal cost, large scale solar power reduced the environmental and financial cost of energy generated by more expensive and more carbon intensive forms of generation. The Scheme will help to decarbonise the electricity system and lower the market price of electricity.
WR-CLI-005	Comments noted that the Scheme would create more emissions that it would save / reduce.	The Applicant reports in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** Section 6.11.7 that the Scheme will yield significant beneficial impacts on total GHG emissions, as such the Scheme will offset the impact to the environment in terms of carbon emissions. Throughout **ES Volume 1, Chapter 6 - Climate Change [APP-042]** the Applicant has provided a reliable basis for assessing the Scheme's climate impacts and resilience, addressing both principal limbs of climate change assessment required by NPS EN-1: the project's GHG implications across its lifecycle, and the vulnerability of the Scheme and receiving environment to present and future climate conditions. **ES Volume 1, Chapter 6 - Climate Change [APP-042]** compares the Scheme to alternate energy generating methods, and the Scheme is less emitting than non-renewable sources over the course of its 60-year lifetime and is typical of GHG emissions from Solar energy generation (see Section 6.9.124). Therefore, the project's GHG impacts are fully consistent with applicable existing and emerging policy requirements, and good practice design standards, noting that construction GHG emissions are overall

ID	Comments/Issues Raised	Applicant's Response
		assessed to be Not Significant in EIA terms nor considered to worsen local climate related risks. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.
WR-CLI-006	Comments noted concern regarding the Applicant's assessment of the full lifecycle of the Scheme, including GHG emissions during construction, operation and decommissioning.	**ES Volume 1, Chapter 6 - Climate Change [APP-042]** provides a comprehensive lifecycle climate assessment covering the Scheme's 60-year lifespan, including construction, maintenance, replacement, and decommissioning phases as required by NPS EN-1. The assessment includes a whole-life GHG evaluation with embodied carbon values for all lifecycle phases, construction and operational emissions detailed in Tables 6.25 and 6.29, decommissioning emissions in Table 6.30, and mitigation measures outlined in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. Cumulative GHG emissions are assessed using Carbon Budgets as the contextualisation framework. The assessment concludes that no significant climate change risks are identified across construction, operational, or decommissioning phases. The Scheme contributes less than 0.05% of the 5th carbon budget and less than 1% annually of the electricity sector budget. Lifecycle emissions are lower than non-renewable alternatives and typical for solar generation, with decommissioning emissions representing less than 0.5% of total scheme GHG emissions. Overall, the project's GHG and carbon impacts are fully consistent with policy requirements and good practice standards. Effects are

ID	Comments/Issues Raised	Applicant's Response
		assessed as Not Significant and do not worsen local climate-related risks.
WR-CLI-007	Comments raised concern about the impact of climate change on the operation of the Scheme.	Climate projections, future weather extremes and climate hazards have been assessed within the Climate Change ES chapter in accordance with relevant guidance. The assessment considers the Scheme throughout its operational life and evaluates vulnerability to future flooding, temperature increases, drought conditions, wildfire risk, storm events and other climate-related hazards. Detailed design would apply the relevant standards and adaptation measures secured through the Development Parameters and Principles document and outline management plans. Following implementation of these measures, no significant residual climate resilience effects are identified.
WR-CLI-008	Comments challenged the assumptions behind the construction and embodied-carbon estimates. The Applicant was requested to provide transparent lifecycle calculations, sensitivity testing and the expected carbon payback period.	The greenhouse gas assessment presented within **ES Volume 1, Chapter 6 - Climate Change [APP-042]** adopts a whole-life approach and assesses emissions associated with construction, operation, maintenance, replacement and decommissioning activities. The assessment includes embodied carbon, transportation, installation and end-of-life activities using the assumptions and methodologies described in the ES. While greenhouse gas emissions arise during construction and throughout the Scheme lifecycle, these are substantially outweighed by the emissions savings resulting from renewable electricity generation over the operational lifetime. The assessment therefore concludes that the Scheme would deliver a significant beneficial effect in relation to greenhouse gas emissions.
WR-CLI-009	Comments noted the potential omissions for replacement and end-of-life equipment	The greenhouse-gas assessment in **ES Volume 1, Chapter 6 - Climate Change [APP-042]** covers construction, operation and

ID	Comments/Issues Raised	Applicant's Response
	emissions. The Applicant was requested to provide a fuller cradle-to-grave assessment and secured measures for changing climate conditions.	decommissioning using its stated assumptions, including replacement and end-of-life activities. This includes embodied emissions from materials and equipment, transportation, installation works and end-of-life management. The assessment therefore considers the Scheme on a cradle-to-grave basis using the assumptions described within the ES. Adaptation and emissions-control measures are carried through the Development Parameters and Principles document and relevant outline management plans.

3.10 Landscape and Visual

Table 3.10 Landscape and Visual

ID	Comments/Issues Raised	Applicant's Response
WR-LAN-001	Concerns were raised about the negative visual impact of the Scheme and some comments stated that the Scheme will industrialise the landscape. Others noted that the Scheme would impact the rural way of life and raised concern about the loss of countryside.	A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Furthermore, a visual amenity assessment of PRoW is presented in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]** and a visual amenity assessment for residential properties in **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [REP1-046]**. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212].** A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening of the Scheme and aid integration with the landscape. Furthermore, retention and enhancement of existing vegetation features further aids this integration within the environment and responds positively to the prevailing character as far as practicable. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured

ID	Comments/Issues Raised	Applicant's Response
		document) through a Requirement in the **Draft DCO [REP1-014]**. Proposed measures will be further detailed in the future iteration of the Green Infrastructure Strategy secured by Requirement 7 of the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and the **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** provides an assessment on agricultural businesses with a farming report provided in **ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]**. The assessment concludes Minor Adverse (not significant) effects to farm business viability during the operational phase.
WR-LAN-002	Comments noted concern about the visual impact of the Scheme's components and associated infrastructure, such as the BESS, National Grid Substation, Project Substations, inverter stations and security installations such as fencing, CCTV, associated pylons.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** presents an assessment of the likely significant effects of all Scheme elements including the BESS, Project Substations and the National Grid Substation. The **Green Infrastructure Strategy [REP1-013]** seeks to retain and enhance existing vegetation, where possible, to aid the integration of the Scheme within the environment and respond to the prevailing character as far as practicable. New woodland belts and native tree planting provide screening to the Scheme as well

ID	Comments/Issues Raised	Applicant's Response
		as improves biodiversity and supports green infrastructure connectivity. Hedgerow reinforcement as detailed in the **Outline LEMP [REP1-064] (**which is a secured document) is proposed along existing features to restore these and aid visual screening, together with new hedgerow creation along the proposed Public Rights of Way. Collectively these proposed measures aim to reinforce existing vegetation across the landscape. The **Design Principles, Parameters and Commitments [REP1-078]** includes a commitment for the BESS, National Grid Substation and Project Substations, that whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Further the **Design Principles, Parameters and Commitments [REP1-078]** includes a minimum set back of this infrastructure from the PRoW. The design commitments specific to the landscape and visual impact of the security installations are set out and secured through the **Design Principles, Parameters and Commitments [REP1-078],** and include: maximum heights of 2.5m for perimeter fencing and 3m for palisade fencing, setting maximum; Pole-mounted, internal-facing CCTV cameras on galvanised steel poles, with a maximum height of 3m, using night-vision technology to avoid the need for night-time lighting of the Solar PV Site; Colours and external finishes for fencing and CCTV to be in keeping with the prevailing surrounding environment, carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape, with final details to be approved by the relevant planning authority; and wherever practicable, use of existing gaps

ID	Comments/Issues Raised	Applicant's Response
		in hedgerows to route fencing, together with the commitment to retain and enhance existing vegetation and features of value to aid integration of the Scheme within the environment.
WR-LAN-003	Concerns were raised about the scale of the Scheme and requests were noted about making the Scheme smaller.	The NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse effects, may result in a significant operational constraint or reduction in function. The Scheme has been designed to maximise the energy generation benefit from the available land and the grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects, as far as practicable. In accordance with the mitigation hierarchy, avoidance measures have been embedded in the design through, for example, the removal of Solar PV Arrays from parcels of land during the design process (as presented in the **Design Approach Document** [**APP-212**]) and the application of design offset buffers from landscape and ecological features, as well as from residential properties, as secured through the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005 and REP1-006]**. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
WR-LAN-004	Comments argued that the visual mitigation measures would not prevent visual harm.	The Applicant notes the concerns regarding the effectiveness of proposed mitigation measures. Paragraph 5.10.5 of NPS EN-1 makes clear that '*virtually all nationally significant energy projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*', and

ID	Comments/Issues Raised	Applicant's Response
	Some comments raised concern about proposed planting and other screening measures taking 15 years or more to mature.	paragraph 5.10.13 confirms that '*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'*. Paragraph 5.10.35 of NPS EN-1 further recognises that the scale of energy projects means that they will often be visible across very wide areas and requires the Secretary of State to judge whether any adverse impact on the landscape would be '*so damaging that it is not offset by the benefits (including need) of the project*'. Paragraph 5.10.37 of NPS EN-1 requires the Secretary of State to consider whether the project has been designed carefully to minimise harm to the landscape, including through appropriate mitigation, rather than to eliminate it. The mitigation measures proposed for the Scheme are proven, well-established measures widely used and secured on comparable solar and energy infrastructure projects. The **Green Infrastructure Strategy [REP1-013]** includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out. The duration of management and monitoring for each landscape element created or enhanced will be in accordance with the Environment Act 2021 (to the extent applicable to the Scheme) and national and local policies.

ID	Comments/Issues Raised	Applicant's Response
		The Applicant considers, in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1, that the residual adverse landscape and visual effects of the Scheme are demonstrably outweighed by the Scheme's benefits and needs case, as set out within the **Planning Statement [REP1-074]**.
WR-LAN-005	Comments noted that the Scheme will cause irreversible damage to the area.	The Applicant acknowledges that the Scheme would introduce changes to the landscape. A detailed landscape and visual assessment is provided in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening / reinforcing existing hedgerows (infill planting / laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
		Further mitigation measures relating to construction and decommissioning are secure in the **Outline CEMP [REP1-058]**, and the **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.
WR-LAN-006	Concerns were raised about the size and height of the solar PV panels.	The maximum design parameters of the Solar PV Panels have been assessed in the **ES [APP-036 to APP-195]**, including the landscape and visual assessment in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**.
WR-LAN-007	Concerns were raised about the impact of the Scheme on tranquillity.	The Applicant acknowledge that the Scheme will have effects on the perceived tranquillity. The effects of the Scheme on tranquillity as a perceptual quality of the landscape character have been assessed within **ES Volume 1, Chapter 7 - Landscape and**

ID	Comments/Issues Raised	Applicant's Response
		Visual [APP-043] and detailed within **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]**. Effects on tranquillity are considered in Section 7.8 of **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**, with each phase of the Scheme (construction, operation at the opening year and 15 years following and at decommissioning). During construction, a series of short term and reversible effects will occur. The construction activity, including the temporary compounds and access and haul routes to facilitate the movement of vehicles, plant and materials alongside wider vehicle movements across the Order Limits and within the wider landscape along the local and strategic road network, crane operations, temporary task lighting is considered reversible as the Scheme is built out. It is likely that a phased approach to construction of the Scheme will occur, so not all elements of the Scheme will be constructed at the same time and in the same locations. Receptors would be subject to increased levels of activities introducing activity uncharacteristic to the attributes of the receiving landscapes and would degrade the integrity of landscape in the short term. The operational phase introduces long-term changes as a result of the transition from an agricultural to energy production landscape, with direct loss of features and increased influences from infrastructure. Solar panels alter land cover and affect perceptions of remoteness and tranquillity. At year 1 although the landscape mitigation would not yet be established, there would be some beneficial effects resulting from the transition from arable farmland to species rich grassland, as well as from the provision of enhanced accessible community spaces and new permissive paths.

ID	Comments/Issues Raised	Applicant's Response
		15 years following the establishment of landscape mitigation, the magnitude experienced will generally decrease. The proposed landscape mitigation would begin to perform its intended environmental function, helping to integrate the development into its setting and reducing the perception of the Scheme. The effects of the Scheme on noise and vibration have been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. This includes an assessment of low frequency noise, which indicates that significant effects are not anticipated.
WR-LAN-008	Comments noted that the Scheme will encompass all local villages.	The Applicant notes the value of the rural landscape for the local community. A detailed landscape and visual assessment is provided in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The design of the Scheme has been informed by an environmentally led approach with the aim to avoid and reduce adverse effects. Landscape and visual considerations including proximity to residencies and villages embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. Furthermore, the **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. During construction when activity across the Order Limits is at its greatest short-term and reversible effects will occur. These result from increased activity, additional vehicle movements, installation of temporary compounds, hedgerow loss, trenching for cabling, and temporary PRoW closures. The operational phase introduces

ID	Comments/Issues Raised	Applicant's Response
		long-term changes as a result of the transition from an agricultural to energy production landscape, with direct loss of features and increased influences from infrastructure in distinct areas across the Order Limits and beyond. Significant adverse landscape effects persist to the landscape character and features of BESS Site, Site 1, and Site 8, with moderate significant effects at LCA's B1 Tas Tributary Farmland, C2 Thurlton Tributary Farmland with Parkland and E2 Great Moulton Plateau Farmland and to the character and features of all Sites excluding Site 6 and the Cable Route Corridor Sites. Cable route areas largely restore with negligible residual effects. Visual effects generally lessen compared to construction but remain significant near the Order Limits, especially for residential and recreational receptors. By Year 15, mitigation planting establishes, reducing effects and enhancing integration. Most landscape receptors experience decreased effects, often minor or not significant, however, Site 1 continues to have major significant adverse effect due to infrastructure scale, with the LCA's B1 Tas Tributary Farmland, LCA E2 Great Moulton Plateau Farmland, the BESS Site, Site 7, and Site 8 maintaining moderate adverse and significant effects.
WR-LAN-009	Concerns were raised around the adequacy of the Landscape and Visual Impact Assessment.	The Applicant acknowledges the concern over landscape and visual effects as a result of the Scheme. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** presents an assessment of the likely effects Scheme and includes considerations of the worst-case Scheme parameters including the BESS, Project Substations and the National Grid Substation. The assessment is based on the Scheme parameters. The Applicant disagrees that the ES has underestimated the magnitude of effect, that key viewpoints have been omitted, that

ID	Comments/Issues Raised	Applicant's Response
		the assessment is based on outdated Scheme parameters, and cumulative effects are not assessed. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken by Chartered Landscape Architect in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The assessment methodology and significance criteria, study area, definition of the landscape and visual baseline (and representative view locations) were agreed through consultation with relevant stakeholders. The LVIA identifies significant adverse effects where these are predicted to occur and does not seek to disregard them. Significant effects are identified during construction and in the early years of operation where receptors are in proximity to the Scheme. The assessment also acknowledges that some significant effects would remain at Year 15. These conclusions are transparently presented within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and demonstrate that the assessment has robustly identified the Scheme's effects rather than seeking to understate them. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows alongside new hedgerows, tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-**

ID	Comments/Issues Raised	Applicant's Response
		058] and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** does not consider the effects of lighting. Measures to minimise and control lighting from the Scheme are described in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** with measures secured in the **Outline CEMP [REP1-058]** and the **Outline OEMP [REP1-060]**. The Applicant considers this approach reduces the potential for significant effects from lighting to occur.
WR-LAN-010	Concerns were raised regarding the quality of the Applicant's photomontages.	The visualisations and wirelines prepared for the assessment and presented in **ES Volume 3, Appendix 7.6 - Visualisations [APP-135]** have been produced in accordance with recognised industry guidance and have been developed to illustrate the Scheme from representative view locations agreed through consultation with South Norfolk Council. The selection of view locations was therefore subject to consultation and reflects locations considered appropriate for assessing likely visual effects. The visualisation does not rely solely on summer conditions. The visualisations include a combination of photowire, and photomontage style outputs presented on winter and summer photography. This approach enables the assessment to illustrate seasonal variation in vegetation cover and to demonstrate potential visibility during both maximum and reduced screening conditions.
WR-LAN-011	Comments stated that the LVIA had not assessed the full extent of cumulative landscape impacts.	**ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** presents an assessment of the likely significant effects of all elements of the scheme. The technical assessments within the **ES [APP-042** to **APP-055]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, which includes all components of the Scheme. The

ID	Comments/Issues Raised	Applicant's Response
		assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. A cumulative assessment is carried out within the LVIA in section 7.11, which addressed the in-combination visual effects between the Scheme and other existing and/or approved developments. This concluded no significant cumulative effects to landscape and visual receptors as a result of the Scheme and committed developments. The **Green Infrastructure Strategy [REP1-013]** seeks to retain and enhance existing vegetation, where possible, to aid the integration of the Scheme within the environment and respond to the prevailing character as far as practicable. New woodland belts and native tree planting provide screening to the Scheme as well as improves biodiversity and supports green infrastructure connectivity. Hedgerow reinforcement as detailed in the **Outline LEMP [REP1-064]** (which is a secured document) is proposed along existing features to improve condition and aid visual screening, together with new hedgerow creation along the proposed Public Rights of Way. The **Design Principles, Parameters and Commitments [REP1-078]** includes a commitment for the BESS, National Grid Substation and Project Substations, that whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Further the **Design Principles, Parameters and Commitments [REP1-078]** includes

ID	Comments/Issues Raised	Applicant's Response
		a minimum set back of this infrastructure from the Public Rights of Way.
WR-LAN-012	Requests were made for clear assessments of the visual impacts to recreational routes.	The effects of the Scheme on landscape character and features have been assessed within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and detailed in **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]**. Furthermore, a visual amenity assessment of Public Rights of Way within the Order Limits is presented in **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]**.
WR-LAN-013	Requests were made for the ExA to visit the site during the Examination process.	The decision as to whether the Examining Authority undertakes site inspections or accompanied/unaccompanied site visits is a matter for the Planning Inspectorate and falls within the Examining Authority's remit in conducting the Examination. Any site visits considered necessary by the Examining Authority will be arranged in accordance with the Examination process. The arrangements for any site inspections during the Examination are matters for the Planning Inspectorate. Interested Parties have an opportunity to make suggestions at Procedural Deadline A for locations that the Examining Authority should visit. A **draft Accompanied Site Visit itinerary [EXAM/9.1]** will be submitted at Deadline 2.
WR-LAN-014	Comments asked for long-term monitoring and replacement of planting during the operational and decommissioning phases of the Scheme.	The **Green Infrastructure Strategy [REP1-013]** includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
		A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the **Outline LEMP [REP1-064]**, including the objectives, prescriptions and targets set out.
WR-LAN-015	Comments stated the historical importance of the villages within the vicinity of the Scheme, including Hempnall and Fritton.	As described in the **Design Approach Document [APP-212]**, heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**. The Applicant notes that potential impacts to Fritton and Hempnall have been addressed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]** and **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 and AS-021]**.
WR-LAN-016	Concerns were raised around the visual impact of the Scheme on the village of Hempnall.	The Applicant notes the concern of the visual effects on the parish of Hempnall and surrounding villages. The LVIA presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and supporting appendices has been undertaken in accordance with

ID	Comments/Issues Raised	Applicant's Response
		the appropriate guidelines and is robust and appropriate for the assessment of the Scheme. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensated for, through the design process. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064] (**which is a secured document) and **Outline PSMS [REP1-050]**. The **Green Infrastructure Strategy [REP1-013]** includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074**] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**.
WR-LAN-017	Concerns were raised regarding the visual impact of the Scheme on the Boudicca Way.	The Applicant acknowledges that users of the Boudicca Way in the vicinity of Sites 5, 7, and 8 would experience views of the Scheme in some locations and that there would be effects on visual amenity, tranquillity and the rural character currently experienced by footpath users. The residual effects on PRoW users, including those arising from views of fencing and solar infrastructure, have been assessed. These effects have been

ID	Comments/Issues Raised	Applicant's Response
		assessed within **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]** and **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The ES recognises the High sensitivity of recreational receptors, including users of the Boudicca Way. The mitigation hierarchy for landscape and visual amenity has been applied throughout the design of the Scheme, and the landscape and visual impacts have been minimised as far as practicable. The **Green Infrastructure Strategy [REP1-013]** has sought to balance the requirements for visual screening against the defining visual qualities of the landscape. The Applicant considers that the residual adverse landscape and visual effects on Site 8 have been minimised as far as practicable through the design evolution and embedded mitigation. Through the design evolution process, solar infrastructure has been removed from the northern and north-western parcels of Sub-Site 8B. The evolution of the Scheme in response to landscape and visual considerations is set out within the **Design Approach Document [APP-212]**. The **Green Infrastructure Strategy [REP1-013]** includes strengthening/reinforcing existing hedgerows alongside new planting including new tree and woodland planting. As a result, visibility from Boudicca Way, Market Lane and Wash Lane has been reduced. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, the **Outline DEMP [REP1-062],** and the **Outline LEMP [REP1-064]**.

ID	Comments/Issues Raised	Applicant's Response
		It is considered by the Applicant, for the reasons set out in the **Planning Statement [REP1-074]**, that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case, including its status as Critical National Priority Infrastructure and its contribution to delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, and provision of permissive paths and community accessible space. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**. Kings Farm, Golden Owl Barn, Wodehouse, The Copse, Hill View and Ley Farm form a cluster of residential properties along Baxter's Lane. Representative Viewpoint VL11/LP8 was selected to assess views from this residential cluster. The assessment concludes that the Scheme would result in a Major to Substantial Significant Adverse effect during the construction phase. During operation, this reduces to a Major Significant Adverse effect in Year 1 and a Moderate Significant Adverse effect by Year 15 as mitigation planting establishes and matures. These effects are reported in the ES and demonstrate that the assessment has fully recognised the sensitivity of these residential receptors and the changing nature of effects over time.
WR-LAN-018	Comments raised concern about the landscape impact to Great Moulton, describing the village as the 'major infrastructure hub'. Other comments noted that Great Moulton's landscape will be permanently altered.	The Applicant notes the concerns raised regarding the location of the National Grid Substation, 400kV Project Substation and BESS at this location. Effects of the Scheme on Great Moulton's landscape and visual receptors have been assessed within the **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**.

ID	Comments/Issues Raised	Applicant's Response
		A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**.
WR-LAN-019	Comments noted the visual impact to Brooke Road.	The Applicant notes the concern regarding visual effects on Brooke Road. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. VL10/Site 8 represents visual receptors located on Brooke Road. Effects range from Moderate Adverse (Significant) during construction and operation Year 1, reducing to Minor Adverse (not Significant) by operation Year 15. Through the design evolution process, solar infrastructure has been removed from the northern and north-western parcels of Sub-

ID	Comments/Issues Raised	Applicant's Response
		Site 8B. The evolution of the Scheme in response to landscape and visual considerations is set out within the **Design Approach Document [APP-212]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. As a result of proposed mitigation measures, visibility from Brooke Road will be reduced as set out previously.
WR-LAN-020	Comments noted the visual impact to Baxter's Lane.	The Applicant notes the concern of visual effects to Baxter's Lane. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. VL11/Site 8 represents the visual receptors at Baxter' Road. Effect on VL11/Site 8 is Major to Substantial Adverse (significant) during construction phase, then reduced to Major Adverse (significant) during operation Year 1 and reduce to Moderate (significant) Adverse effects in Year 15. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and support landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
LAN-021	Comments noted the impact the Scheme will have on properties near Site 7.	The Applicant notes the concern on visual effect from surrounding residential properties. However, this cannot be addressed specifically as it is not clear where the respondent is located. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Furthermore, a visual amenity assessment of residential properties is included in **ES Volume 3, Appendix 7.8- Residential Visual Amenity Assessment [REP1-046]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014].**
WR-LAN-022	Comments raised concern about the impact to private views including the Project Substation in Site 1.	The Applicant notes the concern on the effects on private views, in particular from Sub-Site 1B. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The LVIA relates to public amenity and therefore the value of views to the public. No private views are assessed. However, where appropriate, representative views have been selected from publicly accessible

ID	Comments/Issues Raised	Applicant's Response
		locations within or on the edge of main settlements to represent views that would be experienced. A Residential Visual Amenity Assessment (RVAA) ES **Volume 3, Appendix 7.8 Residential Visual Amenity Assessment [REP1-046]** has been undertaken to support the Application. This builds upon the principles of LVIA but focuses on visual amenity as experienced from individual residential properties. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. With regard to effects from substations the **Design Principles, Parameters and Commitments [REP1-078]** includes a commitment that whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Further the **Design Principles, Parameters**

ID	Comments/Issues Raised	Applicant's Response
		and Commitments [REP1-078] includes a minimum set back of this infrastructure from the Public Rights of Way. The Applicant acknowledges that the Scheme would introduce changes to landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206].**
WR-LAN-023	Comments raised concern about the visual impact of the Project Substation in Site 5.	The Applicant notes the concern regarding visual effects of the Project Substation in Site 5. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and aid landscape integration. The Substation within Site 5 is located in the centre of Sub-Site 5A, adjacent to existing trees and woodland blocks which provide some visual screening. Other landscape mitigation proposed include infill planting within existing hedgerow, native hedgerow planting, and linear tree belt planting. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and

ID	Comments/Issues Raised	Applicant's Response
		decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.
WR-LAN-024	Comments noted the historical importance of the landscape in Long Stratton.	The Applicant notes the Consultee's comments regarding the historic landscape of Long Stratton. Potential impacts to Long Stratton was considered **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],** with these assessments concluding that the Scheme would not result in any impacts to the heritage assets of Long Stratton, nor its surrounding landscape. A detailed landscape and visual assessment is presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Effect on the National Character Area have been assessed. The effect is considered Moderate adverse and significant during construction reducing to minor adverse, not significant during operation. The Applicant acknowledges that the Scheme would introduce changes to landscape character and views. However, for the reasons set out in the **Planning Statement [REP1-074]**, the Applicant considers that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and the need for the development.
LAN-025	Comments included objection to the use of Site 9 due to visual impact.	The Applicant notes the objections to the use of Site 9. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Furthermore, a visual amenity assessment of Public Rights of Way is present in **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]** and on residential

ID	Comments/Issues Raised	Applicant's Response
		properties in **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [REP1-046]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant considers that the residual adverse landscape and visual effects on Site 9 have been minimised as far as practicable through the design evolution and embedded mitigation. This included removing solar PV development to the west of Site 9. It is considered by the Applicant, for the reasons set out in the **Planning Statement [REP1-074]**, that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case, including its status as Critical National Priority Infrastructure and its contribution to delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, and provision of permissive paths and community accessible space. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206].**

ID	Comments/Issues Raised	Applicant's Response
WR-LAN-026	Comments noted the visual impact to Shotesham.	The Applicant notes the concern about landscape and visual effects around Shotesham. The landscape and visual effects of the Scheme, including effects on views from the Shotesham area and the landscape character, have been assessed in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The assessment acknowledges that the introduction of solar infrastructure would result in changes to existing views and landscape character. However, these effects have been assessed taking account of the sensitivity of the receiving landscape, the extent of visibility, and the proposed mitigation measures, including the retention and reinforcement of existing hedgerows and woodland planting. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would aid visual screening and support landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** (which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.
WR-LAN-027	Comments noted the visual impact to Long Stratton.	The Applicant notes the respondent's concern regarding potential visual effects from receptors at Long Stratton. The likely landscape and visual effects of the Scheme including this area, have been

ID	Comments/Issues Raised	Applicant's Response
		assessed in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. **ES Volume 2, Figure 7.5 - Zone of Theoretical Visibility of Site 1 [REP1-039]**, **ES Volume 2, Figure 7.5 - Zone of Theoretical Visibility of Site 2 [REP1-038]** demonstrate there is limited visibility of the Scheme from Long Stratton due to intervening landform, vegetation and built form. As identified on **ES Volume 2, Figure 7.5 - Zone of Theoretical Visibility of Site 4 [REP1-036]** there is some intermittent and limited visibility of Site 4 on the northern and western edges of the settlement. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs

ID	Comments/Issues Raised	Applicant's Response
		case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**.
WR-LAN-028	Comments noted the visual impact to Tivetshall St Mary.	The Applicant notes the concern of the landscape and visual effect on Tivetshall St Mary. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Based on **ES Volume 2, Figure 7.5 - Zone of Theoretical Visibility [REP1-038, REP1-039, REP1-040]**, visibility of the Scheme is limited from Tivetshall St Mary, due to the vegetated nature around Tivetshall St Mary. The closest view location VL7/Site 2, recorded no significant visual effects.
WR-LAN-029	Comments noted the visual impact to Saxlingham Nethergate.	The Applicant notes the concern of the landscape and visual effect on Saxlingham Nethergate. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The Applicant acknowledges the Scheme would introduce a series of new features into the landscape surrounding Saxlingham Nethergate, however the Applicant considers as a worst case this would result in moderate adverse effects in the long term which are reversible as reported in **ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120],** and **ES Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]**. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks,

ID	Comments/Issues Raised	Applicant's Response
		sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**.
WR-LAN-030	Comments noted the visual impact to Woodton.	The Applicant notes the concern of the landscape and visual effect on Woodton. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Based on **ES Volume 2, Figure 7.5 - Zone of Theoretical Visibility Site 10 [REP1-031]**, visibility of the Scheme is limited from Woodton, due to the vegetated nature surrounding Site 10 and the landform. The closest view location VL7/Site 10, recorded no significant visual effects.
WR-LAN-031	Requests were made to the Applicant to produce a fuller assessment of tranquillity, rural character and cumulative impact,	The Applicant acknowledges landscape and visual change. Effects have been assessed for construction, Years 1 and 15 and decommissioning, with screening, management and monitoring

ID	Comments/Issues Raised	Applicant's Response
	alongside measures for avoidance, the layout of such measures and long-term mitigation.	secured through the Green Infrastructure Strategy, Outline LEMP and DCO requirements. Residual effects are considered outweighed by the Scheme benefits. As set out in the **Planning Statement [REP1-074]**, having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The Applicant also notes that the National Grid Substation was reorientated from an east-west to a north-south alignment during design evolution to maximise screening from existing vegetation, reduce visibility from Great Moulton and increase the offset from Narrowgate Way PRoW.
WR-LAN-032	Comments requested accurate mapping to show clearer, secured landscape mitigation and fencing.	The Applicant notes the concerns raised. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** assesses location-specific effects on residential, settlement and PRoW receptors. Detailed design must remain within the assessed parameters and implement mitigation secured through the **Design Principles, Parameters and Commitments [REP1-078]**, **Green Infrastructure Strategy [REP1-013] a**nd **Outline LEMP [REP1-064].** The Applicant considers the published national and local landscape character assessments relied upon in the ES to provide an acceptable basis for the assessment baseline, and confirms that embedded landscape mitigation was developed through an iterative design process. A **Green Infrastructure Strategy [REP1-103]** has been developed which includes strengthening/reinforcing existing hedgerows (infill

ID	Comments/Issues Raised	Applicant's Response
		planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064]** through a Requirement in the **Draft DCO [REP1-014]**. The Applicant submitted a revised version of **ES Volume 3, Appendix 4.1- Illustrative Technical Information [REP1-044]** at Deadline 1 to provide an indicative arrangement within the 15m buffer.
WR-LAN-033	Concerns were raised about the visual impact of the Scheme on The Green and near public paths. Requests were made for a network-level assessment of sequential effects, closures and enclosure, with setbacks and mitigation that retains recreational amenity.	The Applicant notes the concerns raised. The Applicant confirms that PRoW visual amenity has been assessed, with access managed through the **Outline PRoWPPMP [**APP-203] and landscape mitigation secured through the **Green Infrastructure Strategy [REP1-103]** and **Outline LEMP [REP1-064**]. The Applicant has submitted a sequential PRoW assessment in Deadline 2.
WR-LAN-034	Requests were made for the Applicant to produce a worst-case design assessment near Grove Fram House and other sensitive receptors.	The Applicant notes the concerns raised. The Rochdale envelope assessment uses the maximum parameters secured in the **Design Principles, Parameters and Commitments [REP1-078]**; detailed design cannot exceed that assessed envelope. The Applicants LVIA and associated appendices, consider Option A: Single-Axis Tracker Panels as defined in Table 4.1 in **ES Volume 1, Chapter 4 -The Scheme [REP1-022]** as a worst case. Option B Fixed South facing PV arrays have not been assessed.

ID	Comments/Issues Raised	Applicant's Response
		Option B Fixed South facing PV arrays have a reduced height at 3.5m and could reduce the theoretical envelope in which visual effects could occur, however it is considered that at 3.5m high Option B would still be visible above managed hedgerows within the landscape. Furthermore, in considering the worst-case scenario the assessment of the Option A: Single-Axis Tracker Panels has considered these at maximum tilt and the maximum height at 4.5m. However, during the midday period (and hours either side) when the sun is at its highest in the sky, the Option A arrays would be horizontal (to maximise their solar gain) and at a reduced height, therefore the scale and visual complexity of the solar arrays would be reduced from that reported. This reduced height would also occur during the hours of darkness.
WR-LAN-035	Comments noted the size of the buffer zones, and requested larger buffer areas at Low Farm and Prangle Lane.	The Applicant notes the concerns raised. The Applicant confirms that setbacks and planting have been developed through design evolution. The **Design Approach Document [APP-212]** demonstrates how a landscape-led approach has informed the iterative design of the Scheme, with buffer distances considered on a case-by-case basis having regard to factors including landform, existing screening vegetation and other intervening features Existing vegetation would be retained where practicable and new native planting managed and monitored under the Outline LEMP **[REP1-064]**, with effects assessed at Year 1 and Year 15. 50m is the minimum set back, further set backs are determined case by case.
WR-LAN-036	Concerns were raised about the permanent landscape impact of the National Grid Substation, pylons and other Scheme	The Applicant notes the concerns raised. The assessment distinguishes Scheme infrastructure removed at decommissioning from National Grid infrastructure that may remain. Landscape

ID	Comments/Issues Raised	Applicant's Response
	infrastructure that will not be decommissioned.	effects of the retained grid infrastructure have been assessed and mitigation is secured through the Outline LEMP **[REP1-064]**. The Applicant states that the Order Limits were refined to accommodate the grid connection infrastructure, including potential new or replacement pylons, and that the National Grid Substation orientation was changed to maximise existing screening and reduce visibility from Great Moulton.
WR-LAN-037	Comments noted the effect on Hawes Green, Shotesham St Mary, Saxlingham Green and other receptors near Site 7 and 8. This included requests for the Applicant to provide additional viewpoints and confirm that worst-case parameter, winter visibility and mitigation periods have been assessed.	The Applicant notes the concerns raised. The Applicant confirms that the LVIA (presented in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** uses representative viewpoints and maximum parameters and includes separate residential and PRoW assessments. The Applicant considers the submitted viewpoint set sufficient to identify likely significant effects.
WR-LAN-038	Submissions contained photographic and video evidence of the Site, including recordings of birdsong and images of footpaths and private views.	The Applicant has reviewed these submissions and welcomes the evidence provided by Interested Parties.

3.11 Lighting

Table 3.11 Lighting

ID	Comments/Issues Raised	Applicant's Response
WR-LIG-001	Concerns were raised regarding the impact of light pollution. Comments mentioned light pollution from the National Grid Substation, Project Substations, fencing, security and CCTV.	Motion sensing lighting will be used only for maintenance and security purposes. Project Substations and the National Grid Substation will be designed to emit no upward lighting. The lighting requirements for the National Grid Substation shall be designed to comply with the requirements of the National Grid Generic Electricity Substation Design Manual. **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** sets out measures to control lighting, which is secured in the **Outline CEMP [REP1-058]** and the **Outline OEMP [REP1-060].**
WR-LIG-002	Comments referred to the dark sky environment and raised concerns about the Scheme's impact on night-time lighting. Comments noted that the Applicant hasn't provided night-time lighting or dark skies assessments.	Measures to minimise and control lighting from the Scheme are described in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** with measures secured in the **Outline CEMP [REP1-058]** and the **Outline OEMP [REP1-060]**. The Applicant considers this approach reduces the potential for significant effects from lighting to occur and therefore no night time assessment has been undertaken. The Applicant refers to its response to Q1.2.6 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**, which addresses lighting.
WR-LIG-003	Comments raised concerns about the impact of security lighting and false sensor activation, which could impact dark skies, astronomical observation, residents and nocturnal wildlife.	The Applicant notes the concerns raised. Lighting would be limited to safety and security needs and designed to minimise spill. Its direction, operation and management are controlled through the **ES Volume 3, Appendix 7.11 - Lighting Strategy**

ID	Comments/Issues Raised	Applicant's Response
	Requests were made to the Applicant to provide measurable design limits, calibration, testing, monitoring and enforceable operating controls.	**[APP-151]**, the **Outline CEMP [REP1-058]** and the **Draft DCO [REP1-014]** requirements.

3.12 Ecology and Biodiversity

Table 3.12 Ecology and Biodiversity

ID	Comments/Issues Raised	Applicant's Response
WR-ECO-001	Concerns raised concern about the Scheme's impact on the local environment, wildlife, biodiversity and ecology. Comments noted the potential for wildlife displacement or the loss of habitats.	The likely effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensate for, through the design process. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]**, the **Outline DEMP [REP1-062]**, **Outline LEMP [REP1-064] (**which is a secured document) and the **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]**. In relation to habitat loss and wildlife displacement, the majority of the Order Limits comprise intensively managed arable land, with higher value habitats concentrated in linear features such as hedgerows, which have been retained, where feasible. Minimum offset distances from key ecological features are secured through the **Design Principles, Parameters and Commitments [REP1-078]**, and habitat corridors across the farmed landscape are reinforced. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors

ID	Comments/Issues Raised	Applicant's Response
		are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. Habitat creation, enhancement, management and monitoring are set out in the **Outline LEMP [REP1-064]** and secured through the DCO. The Scheme has committed to deliver BNG, including: • 30% gain for habitats; • 25% gain for hedgerows; and • 10% gain for watercourses. These BNG units are secured via Requirement 9 in the **Draft DCO [REP1-014].**
WR-ECO-002	Comments noted that the proposed ecological mitigation measures are insufficient.	The **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]**, the **Outline DEMP [REP1-062]**, **the Outline LEMP [REP1-064]** and **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]** (which are secured documents) are designed with the objective of securing the relevant ecological mitigation measures. The plans also set out monitoring and reporting arrangements to ensure mitigation measures remain effective. The **Green Infrastructure Strategy [REP1-013]** demonstrates the proposed landscape and ecological measures, with the prescriptions and the management of ecological measures set out in the **Outline LEMP [REP1-064]**.

ID	Comments/Issues Raised	Applicant's Response
		Whilst there is currently no legislative requirement for the Scheme to provide BNG, the Applicant has included a commitment to BNG through Requirement 9 of the **Draft DCO [REP1-014]**. 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]**. The **Biodiversity Net Gain Report [APP-218]** demonstrates that the Scheme is able to deliver a net gain in biodiversity, based on the **Green Infrastructure Strategy [REP1-013]**.
WR-ECO-004	Concerns were raised regarding the impact to birds, including raptors and skylark. Comments included description of local birds, such as skylark, owls, raptors and other bird activity around Site 7 and the wider Scheme. Requests were more to the Applicant to provide survey coverage and breeding-territory information, with site-specific avoidance of disturbance, habitat loss and lighting effects.	The Applicant notes the concerns raised. The Applicant confirms that breeding birds, including skylark, have been assessed. Avoidance measures for ground-nesting birds and long-term habitat management are secured through the protected-species strategy, **Outline LEMP [REP1-064]** and **Draft DCO [REP1-014]** requirements. The Applicant's position is that the ecology assessment follows relevant legislation, policy and CIEEM guidance, and that species mitigation and long-term management are secured through the relevant outline management plans and protected-species strategy. Due to the known benefits to breeding birds associated with solar developments, during scoping process, it was concluded that operational phase impacts would be scoped out for breeding birds. However, due to the specific impacts to skylark *Alauda arvensis;* this species has been addressed separately within the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**, and includes construction, operational, and decommissioning phase impact assessments for this species.

ID	Comments/Issues Raised	Applicant's Response
		ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Chapter concludes that no residual effects are anticipated to breeding bird species. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005].** have been applied to retain, protect and enhance ecological assets. They include for the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) birds. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity including, but not limited to, species of farmland birds, including skylark. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**.
WR-ECO-005	Concerns were raised about the impact to bats, including bat flight lines, hedgerows, ponds and woodland links around Site 3, Spring Wood and Site 5, including barbastelle records. Requests were made to the Applicant to provide mapped evidence of bat activity and to include protection measures, such as the avoidance of sensitive habitat, dark	The Applicant confirms that bat activity, roost features and habitat connectivity have been assessed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** Vegetation retention, sensitive lighting, buffers and habitat management are secured through the **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050]** and the **Outline LEMP [REP1-064]**. The bat activity surveys undertaken are reported in **ES Volume 3, Appendix - 8.6 Bat Activity Survey Report [APP-157]** with an assessment in **ES Volume 1, Chapter 8 -**

ID	Comments/Issues Raised	Applicant's Response
	corridors, restoration and long-term monitoring.	**Ecology and Biodiversity [APP-044]** where surrounding barbastelle colonies are considered. Minimum design offsets would be applied to watercourses, hedgerows, trees and woodland, as set out in the **Design Principles, Parameters and Commitments [REP1-078]**, which would protect opportunities for bat activity and foraging. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** has been underpinned by ground level tree assessments for roosting bats, and bat activity surveys, as detailed within **ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment [APP-156]** and **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-156]** respectively. The Applicant acknowledges the presence of Barbastelle Bat colonies surrounding the Order Limits and has considered the core sustenance zone within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Ecology has informed the Scheme design, including design principles and buffers, and that the mitigation hierarchy has been applied through avoidance, reduction, mitigation and compensation secured by the **Outline CEMP [REP1-058]**, **OEMP [REP1-060]**, **DEMP [REP1-062]**, **LEMP [REP1-064]** and the **Protected Species Mitigation Strategy** (presented in **ES Volume 3, Appendix 8.10 [REP1-050]**). The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no

ID	Comments/Issues Raised	Applicant's Response
		specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005]**, include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong.

ID	Comments/Issues Raised	Applicant's Response
		ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and **ES Volume 3. Appendix 8.6 - Bat Activity Survey Report [APP-157]** have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. The Applicant agrees that there are potentially other woodlands in the wider landscape, and outside the DCO limits, that support further colonies of Barbastelle bats. As a precautionary measure, the embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
WR-ECO-006	Concerns were raised regarding the impact on newts.	Where ponds have not been surveyed (due to survey access restrictions), a precautionary approach has been adopted with an assumed presence of GCN. The **Design Principles, Parameters and Commitments [REP1-078]** sets out minimum offset distances that will be applied to ponds. Following additional 2026 pond surveys the **ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report (Revision 2) [APP-154]** has been submitted at Deadline 1. The Applicant considers that the GCN survey data is sufficient to identify the assess the likely effects and appropriate mitigation

ID	Comments/Issues Raised	Applicant's Response
		required for the construction and decommissioning phases. The assessment of impacts are reported in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]** (see Method Statement 9: Specific Measures for Avoidance of Impacts on Great Crested Newts). In the Planning Inspectorates Scoping Opinion (February 2025) it was agreed to scope great crested newts out the operational phase assessment; and PINS agreed that significant impacts to GCN populations are unlikely to occur during the operational phase. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** concluded that impacts upon great crested newts would be negligible and not significant.
WR-ECO-007	Concerns were raised regarding the impact to deer.	Deer species do not receive direct legislative protection relevant to ecology or nature conservation, whilst deer species are not listed as Priority Species, albeit may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). Habitat fragmentation and loss is considered in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**. The Applicant acknowledges that fencing will deter larger deer species from utilising areas. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the

ID	Comments/Issues Raised	Applicant's Response
		approach to balance the extent of perimeter fencing in the landscape with these green corridors. The alignment of perimeter fencing is shown on **Works Plan [REP1-005]**. Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the **Draft DCO [REP1-014]**.
WR-ECO-008	Concerns were raised regarding the impact to rabbits and hare.	Rabbits are not afforded any legislative protection, however, brown hare, a priority mammal, is considered in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** and protection measures set out in the **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]**. Management of retained and newly created habitats that will benefit wildlife (including rabbits and hares) are prescribed within the **Outline LEMP [REP1-064].** In accordance with these, a Protected Species Mitigation Strategy and a detailed LEMP will be submitted to and approved by the relevant planning authority in line with Requirement 8 and Requirement 7, respectively, of the **Draft DCO [REP1-014]**.
WR-ECO-009	Concerns were raised regarding the impact to white clawed crayfish.	A habitat suitability survey for White Clawed Crayfish was undertaken with the findings presented in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]**. Measures to control pollution to watercourses are set out in the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]** and the **Outline DEMP [REP1-062]**. Precautionary avoidance measures for White Clawed Crayfish are included in the Outline Protected Species Mitigation Strategy and Outline CEMP, with detailed methods to be developed in consultation with the relevant regulators.

ID	Comments/Issues Raised	Applicant's Response
		Design Principles, Parameters and Commitments [REP1-078] sets out the minimum offset distances within the design for main rivers and watercourses to prevent pollution. Also, as per the **Outline Cable Route Construction Statement [REP1-080],** where cables cross rivers, the Applicant is also committed to a minimum cable depth of 5m below the surveyed bed of main rivers. Trenchless solutions will be employed when crossing the Hempnall Beck, thereby avoiding any temporary impacts upon White-Clawed Crayfish populations. The Applicant notes the Examining Authority's request for further information and potentially for surveys to be carried out for White Clawed Crayfish between July and September 2026, in the **Rule 6 Letter [PD-005]**. The Applicant provided an update on this at Procedural Deadline A. The Position Statement concluded that habitat suitability within the surveyed reaches was low and that the dry survey conditions did not materially affect the validity of the habitat assessment, as persistent habitat features relevant to white-clawed crayfish would have remained identifiable. Taking account of the habitat evidence and secured avoidance, biosecurity, pollution prevention and sediment control measures, the Applicant concluded that significant effects on white-clawed crayfish are not anticipated.
WR-ECO-010	Comments noted the inadequacy of aquatic surveys which were conducted at inappropriate times in the season and when streams/ditches were dry.	The aquatic ecology assessment adopted a habitat-led approach, informed by the availability of appropriate desk study records, as per **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment [APP-160]**. The Aquatic Habitat Assessment explicitly acknowledged that surveys were undertaken during a period of unusually dry conditions and identified this as a limitation of the baseline

ID	Comments/Issues Raised	Applicant's Response
		dataset. However, the assessment did not rely solely on the presence or absence of water during the survey period. Instead, watercourses were assessed based on habitat characteristics, hydrological connectivity, channel morphology, aquatic vegetation and their function within the wider catchment. Importantly, watercourses displaying evidence of periodic flow, hydrological connectivity or aquatic function were retained within the assessment, even where they were dry or only partially wetted at the time of survey. The assessment therefore distinguished between genuinely ephemeral or seasonally functioning watercourses and channels with little or no aquatic ecological function. A precautionary approach was also adopted when considering species occurrence. Where aquatic species were identified through desk-study records within hydrologically connected watercourses, these species were considered within the assessment where a plausible pathway existed, regardless of whether individual ephemeral channels would be capable of supporting the full range of species recorded elsewhere in the catchment. As such, the assessment intentionally incorporated a precautionary consideration of species potentially associated with the wider hydrological network. This approach increases the robustness of the assessment and reduces the likelihood of ecological effects being underestimated (**ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**). The Applicant therefore remains satisfied that the aquatic ecology assessment provides a robust and representative evaluation of aquatic habitats and species within the study area and

ID	Comments/Issues Raised	Applicant's Response
		appropriately accounts for the ecological role of both perennial and ephemeral watercourses. The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys is presented in **ES Volume 3, Appendices 8.1 – 8.9 [AS-017, and APP-153 – APP-160]**, with **ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [AS-017]** providing the results of the extended habitat survey, **ES Volume 3, Appendix 8.2 - Invertebrate Survey Report [APP-153]** providing the results of the invertebrate survey, **ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report (Revision 2) [APP-154] (submitted at Deadline 1)** providing the updated 2026 results of the great crested newt survey (eDNA) and **ES Volume 3, Appendix 8.6- Bat Activity Survey Report [APP-157]** providing the results of the bat activity surveys.
WR-ECO-011	Concerns were raised regarding the impact of construction on local wildlife.	An assessment of potential construction phase effects of specific species/species groups is set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044],** impacts are assessed as not significant. Accordingly, no residual effects are anticipated. Construction phase mitigation for protected / notable habitats and species / species groups is secured through the **Outline CEMP [REP1-058]** and **ES Volume 3, Appendix 8.10 – Outline PSMS [REP1-050]**, as applicable, each of which is designed with the objective of securing the relevant ecological mitigation measures required during construction. Detailed management plans and a Protected Species Mitigation Strategy will be

ID	Comments/Issues Raised	Applicant's Response
		submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the **Draft DCO [REP1-014]**.
WR-ECO-012	Concerns were raised regarding the impact to small mammals.	An assessment of potential effects of the Scheme on priority mammal species (including hedgehog, harvest mouse, polecat, and brown hare) is set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**; impacts are assessed as not significant, with no residual effects anticipated. Mitigation for small mammals is secured through the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062]**, and **ES Volume 3, Appendix 8.10 – Outline PSMS [REP1-050]**, as applicable. Management of retained and newly created habitats that will benefit wildlife (including small mammals) are prescribed within the **Outline LEMP [REP1-064]**.
WR-ECO-013	Concern were raised regarding the impact to protected species.	As set out within the responses above, protected species have been identified, and potential effects assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**; impacts are assessed as not significant. Accordingly, no residual effects are anticipated. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensate for, through the design process. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064]**

ID	Comments/Issues Raised	Applicant's Response
		(which is a secured document) and **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]**. A Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in line with Requirement 8 of the **Draft DCO [REP1-014]** which will be broadly in adherence with the Outline PSMS, detailing species-specific mitigation and avoidance measures for species / species-groups such as nesting birds, roosting bats, aquatic mammals, badgers, and white-clawed crayfish
WR-ECO-014	Comments noted the impact on local ponds and natural ditches. Other comments noted the rare and sensitive habitats in chalk streams.	The Scheme design evolution has included embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005]** which are designed to avoid impacts to ponds, ditches and watercourses and include for offsets to ponds (30-50m), and watercourses and ditches (at least 10m). Effects on watercourses, are assessed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** with no significant effects anticipated during construction and decommissioning, and significant positive effects anticipated during the operational phase. No residual effects are anticipated. A broad range of habitat enhancements are recommended within the **Outline LEMP [REP1-064]**, including reinstating ghost ponds which will provide additional; aquatic habitat. **ES Volume 1, Chapter 9 – Water Environment [APP-045]** and **ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [REP1-056]** identify the River Tas and Hempnall Beck as Chalk Streams.

ID	Comments/Issues Raised	Applicant's Response
		Mitigation measures to minimise the risk of pollution to the water environment are set out in the O**utline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**. Substantially in accordance with these, detailed management plans will be submitted to and approved by the relevant planning authority. Further the outline drainage strategy and pollution control for Conversion Units, BESS, Project Substations and the National Grid Substation are given in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**. In accordance with Requirement 11 of the **Draft DCO [REP1-014]**, a detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority. Where cables cross main rivers (the River Tas and Hempnall Beck in the Fritton Grange Meadows County Wildlife Site), the Applicant has committed to a minimum cable depth beneath main rivers of 5m below the surveyed bed of main rivers (**Design Principles, Parameters and Commitments [REP1-078]**).
WR-ECO-015	Comments noted the impact of site fencing on wildlife movement, breeding habits and established wildlife corridors.	Habitat fragmentation and loss is considered in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors.

ID	Comments/Issues Raised	Applicant's Response
		The alignment of perimeter fencing is shown on **Works Plan [REP1-005]**. Details of fencing will need to be submitted approved by the relevant planning authority in accordance with Requirement 10 of the **Draft DCO [REP1-014]**. It is considered that any concerns about deer collisions would be mitigated appropriately through the alignment of any deer fencing, which is to be strategically placed to secure routes that avoid directing deer towards roads.
WR-ECO-016	Comments stated that not enough research is available on the impact of solar farms on wildlife.	A full ecological impact assessment is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. This assessment follows industry standards (Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (V 1.3)). This includes a detailed assessment of potential impacts from the Scheme on important ecological features; including designated sites for nature conservation, ancient woodlands, protected and notable habitats and species. The assessment has been underpinned by extensive baseline ecological survey for habitats and species, as detailed within **ES Volume 3, Appendices 8.1 – 8.9 [AS-017** and **APP-153 - APP-160]**.
WR-ECO-017	Comments referred to biodiversity net gain concerns, with some noting that the 10% minimum will not be reached.	Whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has committed to providing a minimum of 10% BNG. A detailed approach is provided within the **Biodiversity Net Gain Report [APP-218]** which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. Further

ID	Comments/Issues Raised	Applicant's Response
		information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**. The minimum % BNG the Applicant is has committed to for each unit type is the following: • +30% Habitat Units • +25% Hedgerow Units • +10% Watercourse Units These figures are lower than the figures the Scheme is anticipated to deliver as reported in the **Biodiversity Net Gain Assessment Report [APP-218]**. However, a lower percentage has been included in the draft DCO in order to retain design flexibility and account for any adjustments as a result of detailed design 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-ECO-018	Comments noted the potential use of pesticides and insecticides.	The Scheme designs primarily utilise existing intensively managed farmland habitats, of sub-optimal value for wildlife. These habitats are subject to regular herbicide/insecticide applications. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of regular and extensive herbicides / pesticides application (with herbicide use limited to when absolutely necessary to treat invasive species and/or injurious species and

ID	Comments/Issues Raised	Applicant's Response
		pesticide use not employed at all), and converted to grassland mosaics, managed for the benefit of biodiversity, resulting in significant gains for biodiversity on-Site. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**.
WR-ECO-019	Concerns were raised regarding the impact of and the potential removal of roadside nature reserves.	**ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** includes assessment of the Scheme on important ecological features including Roadside Nature Reserves (RNRs). All RNRs are designated for their remnant grasslands (and associated species abundance), by their very nature, this habitat is low in height, which will pose little risk to highway visibility for Order Limits access and therefore, will not be subject to clearance activities. However, adjacent overgrown hedgerows or overhanging tree canopies within the footprints of the RNRs may require temporary reduction measures during the construction phase, to aid access and visibility splays (which may potentially benefit the RNR ground flora). No other activities are proposed within the RNRs boundaries and where practicable, construction/ decommissioning phase activities (apart from the actual use of the road surface) will implement a 30m buffer surrounding the RNRs. The **Outline CEMP [REP1-058]** sets out measures to ensure run-off control, pollution prevention and construction phase dust impacts will be implemented to avoid impacts to important ecological features which include RNRs.
WR-ECO-020	Concerns were raised on the impact to nocturnal animals, particularly on nocturnal animals.	**ES Volume 1, Chapter 4 – The Scheme [REP1-022]** states that lighting is not required within the Solar PV Site during the operational phase of the Scheme and that all routine maintenance activities would be scheduled for daylight hours as

ID	Comments/Issues Raised	Applicant's Response
		far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Motion sensing security lighting would be provided within the Substation, the National Grid Substation, and within the BESS Compound to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. On this basis no significant impacts to nocturnal species (bats, badgers, aquatic mammals etc) as a result of artificial lighting will occur, with no significant effects during construction, operational, and decommissioning phases anticipated, as assessed within **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**.
WR-ECO-021	Requests were made to the Applicant to produce assessments of movement corridors, as well as introducing wildlife-permeable fencing Comments referred to the deer routes in Sites 5 and 10.	Habitat fragmentation and loss is considered in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].** The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. It is only deer species that are considered likely to be directly prevented from freely moving across the Order Limits, however the green corridors left in place will allow them to move across field boundaries within the Order Limits without significant barriers. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. Regarding Site 10, existing green corridors will be retained and expanded upon, for example a large area of grassland creation on the eastern boundary, habitat creation in woodland and pond buffers etc, and Site 5 has large areas of habitat retention and enhancement within the north-west, north-east, and south-east of

ID	Comments/Issues Raised	Applicant's Response
		the Site. These are all accessible to deer and providing enhanced foraging which won't be subject to deterrence (as currently deers are actively deterred from eating crops on the fields utilised for solar PV apparatus). The indicative alignment of perimeter fencing is shown on ES **Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**. Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the **Draft DCO [REP1-014].**
WR-ECO-022	Comments noted risks to hedgerows, an ancient oak tree in Site 7F, stewardship land and wildlife movements between access routes and substations, and during construction. Requests were made to the Applicant to provide clearer limits on vegetation removal, alternative layouts and enforceable protection, management and monitoring.	Habitat fragmentation and loss during the construction phase is considered in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].** The Applicant confirms that vegetation removal has been minimised through design evolution. There would be no loss of ancient or veteran trees as secured in the **Outline CEMP [REP1-058]**. The ancient oak tree in Site 7F will be protected by the buffer zone set out in the **Design Principles, Parameters and Commitments [REP1-078]**. Relevant mitigation and management measures are set out in the **Outline CEMP [APP-196]** and the **Outline LEMP [REP1-064]**, and are secured through the relevant Requirements of the latest Revised **Draft DCO [REP1-014]**, including Requirement 13 (CEMP) and Requirement 7 (LEMP).. The Applicant considers that the ecological assessment is robust and that appropriate mitigation and compensation are secured through the **Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [REP1-064]** and **Outline Protected Species Mitigation Strategy [APP-161],** together with the relevant Requirements of the **Revised Draft DCO [REP1-014].**

ID	Comments/Issues Raised	Applicant's Response
WR-ECO-023	Comments noted the absence of site-specific surveys, particularly near Hundred Lane, for flora, the River Tas, Site & and on white clawed crayfish. Comments noted that survey windows may have passed, but these surveys should still be performed on a precautionary basis.	The Applicant confirms that Ecology survey scope and methodology was agreed through statutory scoping processes, with relevant assessment set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and detailed survey methodology/limitations/constraints and mitigation detailed within the accompanying technical appendices. An extended habitat survey (UKHab methodology) has been undertaken as reported in **ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152]**. This records the findings of a desk-based study and the detailed survey and mapping of habitats (including grassland and hedgerow habitats) identified within the Order Limits. During this extended habitat survey, there was no evidence to suggest that further targeted botanical surveys are required. Mitigation measures designed to avoid impacts upon aquatic receptors such as adjacent watercourses are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**. Habitats avoidance/mitigation measures during construction and operation of the Scheme are secured in the **Outline LEMP [REP1-064]** including commitments for grassland protection and reinstatement along lane/road verges. A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out. The Applicant provided further information regarding white-clawed crayfish in the **Applicant's Position Statement on White-Clawed Crayfish [PDA-007]**.

ID	Comments/Issues Raised	Applicant's Response
		The Applicant's position is that the assessment methodology accords with relevant legislation, policy and CIEEM guidance, and that the submitted assessment, together with the secured mitigation and compensation, is robust.

3.13 Arboriculture

Table 3.13 Arboriculture

ID	Summary of Representation	Applicant's Response
WR-ARB-001	Concerns were raised regarding the impact to vegetation, such as meadows, woods, ancient woodland, trees, hedgerows, wildflowers, etc. Comments noted the potential for the removal or loss of hedgerows.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**. There would be no loss of Ancient Woodland or veteran trees. However, it is acknowledged by the Applicant that there will be some tree and hedgerow loss. As set out in the **Outline CEMP [REP1-058]**, where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Where hedgerow removal is required, no more than 10m will be removed in accordance with the requirements set out within the **Outline LEMP [REP1-064]**. As shown on the **Green Infrastructure Strategy [REP1-013]**, the Scheme would provide the strengthening/reinforcing of existing hedgerows (infill planting/laying coppicing), together with new tree and woodland planting. The prescriptions and the long-term management of the landscape and ecological measures are provided in the **Outline LEMP [REP1-064]**.

ID	Summary of Representation	Applicant's Response
		The likely effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212].** The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensate for, through the design process. Mitigation is secured through various management plans including the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]**, **Outline DEMP [REP1-062], Outline LEMP [REP1-064] (**which is a secured document) and **ES Volume 3, Appendix 8.10 - Outline PSMS [REP1-050]**. In relation to habitat loss and wildlife displacement, the majority of the Order Limits comprise intensively managed arable land, with higher value habitats concentrated in linear features such as hedgerows, which have been retained, where feasible.
WR-ARB-002	Comments argued that the Applicant had not performed adequate botanical surveys.	An extended habitat survey (using UKHab methodology) has been undertaken as reported in **ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [AS-017]**. This records the findings of a desk-based study and the detailed survey and mapping of habitats identified within the Order Limits. During this extended habitat survey, there is no evidence to suggest that further targeted botanical surveys are required. The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. Notably, Natural England has not

ID	Summary of Representation	Applicant's Response
		requested further survey within their relevant representation. The results and detailed methodology of specific ecological surveys is presented in **ES Volume 3, Appendix 8.1 – 8.9 [AS-017 and APP-153 – APP-160]**.
WR-ARB-003	Comments noted the potential for construction traffic to damage verges.	As set out in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **Outline CTMP [REP1-068]**, construction traffic will be managed through defined access routes and traffic management measures to minimise effects on the Local Road Network and associated assets. This includes the potential to restrict vehicle sizes in some locations to aid manoeuvring and traffic management measures like reducing speed limits during construction which in turn reduces visibility splay requirements. Commonly required vegetation reduction to facilitate visibility splay for vehicles and highway works associated with AIL movements would primarily consist of hedgerow trimming and overhanging branch reduction, which would not impact the designated features of roadside nature reserves (RNR'S) (rare grassland flora) and other road verge flora. These matters are subject to detailed design and will be discussed and agreed through a detailed CTMP, secured by Requirement of the **Draft DCO [REP1-014]**. The detailed CTMP will be developed and agreed with the Local Highway Authority prior to the commencement of construction. Construction traffic would be managed in accordance with the **Outline CTMP [APP-201]** to minimise verge overrunning and damage; pre- and post-construction road condition surveys will be undertaken and any highway defects reasonably attributable to Scheme construction traffic will be rectified to the satisfaction of the Local Highway Authority.

ID	Summary of Representation	Applicant's Response
		It is considered unlikely that existing RNR's will be impacted by 'overrunning'. The existing single-lane roads are regularly used by large agricultural vehicles with no avoidance measures currently in place, therefore, any damage associated with overrunning will have impacted and shaped road verges in line with the current baseline.
WR-ARB-004	Comments noted the potential impact to SSSIs.	There are no statutory ecological designations (including SSSI) or Ancient Woodland within the Order Limits. **ES Volume 1, Ecology and Biodiversity [APP-044]** includes assessment of the Scheme on important ecological features including SSSI and other designated sites for nature conservation. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005** and **REP1-006]** have been applied to retain, protect and enhance ecological assets including all 10 surrounding SSSI's (within an 5km radius of the Order Limits) and ancient woodland parcels (within a 2km radius of the Order Limits). These include a minimum of 30m construction exclusion zone surrounding SSSI's, and; establishing root protection zones around SSSI woodlands directly adjacent to the Order Limits. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the immediately surrounding SSSI edges), and providing enhanced supporting habitats surrounding SSSI parcels for the benefit of biodiversity within these Sites. Natural England has confirmed through its Relevant Representation [RR-1410] that it agrees with the conclusions of **ES Volume 1**, **Chapter 8 - Ecology and**

ID	Summary of Representation	Applicant's Response
		Biodiversity [APP-044] that there will be no likely significant adverse effects on SSSI's with the implementation of the CEMP which will be in accordance with the **Outline CEMP [REP1-058]**.

3.14 Water Environment

Table 3.14 Water Environment

ID	Comments/Issues Raised	Applicant's Response
WR-WAT-001	Concerns were raised regarding the Scheme's impact on local flooding, including panel runoff. Some comments noted that the flood risk assessment is inadequate.	Flood (from all sources) and surface water risk has been considered in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, which identifies areas at risk of flooding, taking into consideration climate change. The potential for erosion has been considered in **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. An outline drainage strategy has also been developed in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 a**nd **REP1-054]**. Requirement 11 of the **Draft DCO [REP1-014]** requires written details of the surface water drainage scheme to be submitted to and approved by the relevant planning authority. **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** concludes that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. A proportionate Sequential Test and Exception Test is provided in **Planning Statement [REP1-074]**. The Applicant has applied both the Sequential and Exception Tests and demonstrated how these have been met in line with relevant policy. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays),

ID	Comments/Issues Raised	Applicant's Response
		would be sited in areas of Flood Zone 1, at lower risk of flooding. The wider sustainability benefits delivered by the Scheme, which include low carbon electricity in support of Government's energy policy aims, green infrastructure and habitat creation, provision of permissive paths and community accessible space, job education and skills creation, overwhelmingly outweigh the flood risk and the Scheme.
WR-WAT-002	Concerns were raised regarding the impact to chalk streams and chalk aquifer catchments.	**ES Volume 1, Chapter 9 – Water Environment [APP-045]** and **ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [REP1-056]** identify the River Tas and Hempnall Beck as Chalk Streams. Mitigation measures to minimise the risk of pollution to the water environment are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** and are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014].** In accordance with Requirement 11 of the **Draft DCO [REP1-014]**, a detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority. Based on the above, the impacts from the Scheme to the Hempnall Beck, the River Tas and other water receptors have been assessed within chapter 9 as 'Not Significant', with the exception of the cessation of agricultural use/fertiliser which is 'Significant Major Beneficial'. Where cables cross main rivers (the River Tas and Hempnall Beck), the Applicant has committed to an Avoidance Area subject to trenchless crossings and a minimum cable depth of 5m below the surveyed bed of main rivers (as presented in **Design Principles, Parameters and Commitments [REP1-078]**).

ID	Comments/Issues Raised	Applicant's Response
WR-WAT-003	Concerns were raised regarding potential increases in run-off will overwhelm natural and/or man-made drainage systems.	No surface water connections to Anglian Water Services sewers are proposed. The majority of the Scheme consists of solar panels which will be raised on narrow supports at an appropriate freeboard above ground level/anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The ground cover beneath the panels will be grass/wildflower meadow and runoff from panels will drip via dispersed gaps across their faces onto the ground cover and percolate naturally into the soil as per the existing drainage regime. An outline surface water drainage strategy has been developed to manage surface water runoff, as set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052** and **REP1-054]**. In accordance with Requirement 11 of the **Draft DCO [REP1-014]**, a detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority. The inspection and maintenance requirements for long term management of the Scheme's surface water drainage system is provided in the Preliminary Surface Water Drainage Maintenance Schedule of the **Outline OEMP [REP1-060].** Flood risk (from all sources) including surface water risk has been considered in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, which identifies areas at risk of flooding, taking into consideration climate change. **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** concludes that the Scheme is safe and will not

ID	Comments/Issues Raised	Applicant's Response
		detrimentally impact on flood risk within the Order Limits or elsewhere.
WR-WAT-004	Concerns were raised regarding the impact of the Scheme on the water environment.	Flood (from all sources) and surface water risk has been considered in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]**, which identifies areas at risk of flooding, taking into consideration climate change. The water environment is also assessed in **ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [REP1-056]** and **ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]**. An outline drainage strategy has also been developed in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052 a**nd **REP1-054]**. Requirement 11 of the **Draft DCO [REP1-014]** requires written details of the surface water drainage scheme to be submitted to and approved by the relevant planning authority. Further design commitments and mitigation measures for flood risk and drainage are set out in the **Design Principles, Parameters and Commitments [REP1-078],** the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**.
WR-WAT-005	Comments referred to insufficient hydrological and hydro-ecological assessment work.	Hydrological connectivity to water receptors within a 2km radius has been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The assessment concludes that with the inclusion of embedded mitigation measures including provision of surface water runoff management and pollution management set out and secured within the **Outline CEMP**

ID	Comments/Issues Raised	Applicant's Response
		[REP1-058], Outline OEMP [REP1-060] and **Outline DEMP [REP1-062**] the effects on water receptors are 'Not Significant', with exception of the effects of cessation of agricultural use/chemicals which are 'Significant Major Beneficial'. An assessment of all sources of flood risk has been undertaken for the Order Limits within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052]**.
WR-WAT-006	Comments referred to soil compaction.	Ground and soil compaction is considered in **ES Volume 1, Chapter 9 – Water Environment [APP-045]**, which considered the movement of construction vehicles, soil stripping and placement of materials / stockpiling which can contribute to ground compaction and changes in the pattern, quantity and quality of surface water runoff. In light of the detailed mitigation identified in Section 9.7 of the chapter including the limitation of heavy goods vehicles (HGV) movements to compound areas as far as practicable and the storage and handling of materials will be undertaken in temporary compounds/designated areas, no significant effect were identified. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. Identifies that it is very unlikely that compaction from the works will result in changes to drainage status at depth such that ALC grade might be affected. The **Outline SRMP [APP-204]** sets out good practice measures in relation to soil handling and management, including in relation to soil compaction. Substantially in accordance with this, a detailed SRMP will be submitted and approved in accordance with Requirement 18 of the **Draft DCO [REP1-014]**.

ID	Comments/Issues Raised	Applicant's Response
WR-WAT-007	Comments noted the potential contamination of local water sources.	Embedded mitigation measures including provision of surface water runoff management and pollution management are set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. As such, risks are appropriately managed.
WR-WAT-008	Concerns were raised regarding the impact of construction, and construction traffic, on drainage systems.	An assessment of the effects of the Scheme on soils, agricultural land and drainage is provided in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** and effects on the water environment, including hydrology, are assessed in **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The impacts from the Scheme to the water receptors have been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** and with the incorporation of embedded mitigation as secured within the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** as 'Not Significant', with the exception of the cessation of agricultural use/fertiliser which is 'Significant Major Beneficial'. Measures for the management and handling of soils, including measures to minimise compaction and reinstate soils to their previous condition, are described in the **Outline SRMP [APP-204]**. Access tracks that will remain in place throughout the lifetime of the scheme (including the permanent access track for the National Grid Substation) will incorporate swales or filter drains running parallel with and/or at the downslope of the tracks as secured within the **Design Principles, Parameters and Commitments [REP1-078]**.

ID	Comments/Issues Raised	Applicant's Response
		Mitigation measures to minimise any potential effects on soils are set out in ES Chapter 15, Section 15.7 **[APP-051]**. As assessed in ES Chapter 15, Section 15.10 there are no significant effects on soils at any phase of the development. Access tracks and haulage roads within the scheme except the access track for the NG Substation will all be reinstated back to agricultural land of a comparable grade upon decommissioning. Measures for avoiding and ameliorating compaction will be set out in detail within the detailed SRMP which will be controlled by DCO.
WR-WAT-009	Concerns were raised regarding the impact of construction traffic on drainage.	The characteristics of the local road network have been considered as part of the transport assessment and the development of the access strategy. **The Outline CTMP [REP1-068]** includes a range of traffic management measures designed to facilitate the safe movement of construction vehicles and minimise effects on the Local Highway Network. In addition, pre- and post-construction road condition surveys will be undertaken on relevant parts of the Local Road Network, with the scope agreed with NCC as the Local Highway Authority. Any highway defects reasonably attributable to construction traffic associated with the Scheme would be rectified to the satisfaction of the Local Highway Authority. The Applicant therefore considers that appropriate measures are in place to manage potential effects on local roads and associated drainage infrastructure during construction.
WR-WAT-010	Comments referred to the potential pollution of the River Tas.	The **Design Principles, Parameters and Commitments [REP1-078]** sets out the minimum offset distances to main rivers,

ID	Comments/Issues Raised	Applicant's Response
		watercourses and ditches. Where cables cross main rivers, such as the River Tas, the Applicant is also committed to a minimum cable depth beneath main rivers of 5m below the surveyed bed of main rivers. An assessment on the water environment, including pollution, thermal dynamics, groundwater recharge, are provided in **ES Volume 1, Chapter 9 – Water Environment [APP-045]** and **ES Volume 1, Chapter 16 – Ground Conditions [APP-052].** This assessment concludes that with the incorporation of embedded mitigation measures as outlined in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014],** the effects on water receptors (including the River Tas) are 'Not Significant', with the exception of the effects of cessation of agricultural use which are assessed as 'Significant Major Beneficial'. Substantially in accordance with these management plans, detailed management plans will be submitted to and approved by the relevant planning authority.
WR-WAT-011	Comments referred to the lack of detailed site-specifical hydrological modelling, particularly for Site 8.	**ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052]** provides an assessment of fluvial flood risk for Site 8 and confirms that all built infrastructure (including solar panels) will be located within Flood Zone 1 and outside all modelled floodplains up to and including the 1 in 1000 (0.1%) annual probability plus allowance for climate change within Site 8 (adjacent to Shotesham Beck and Market Lane).

ID	Comments/Issues Raised	Applicant's Response
		The proposed use for Sub-Sites 8A and 8B will be solar panels which are located outside of areas of Flood Zones 2 and 3, and outside of areas of higher surface water flood risk as far as reasonably practicable, as set out in Section 8 of **ES Volume 3: Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052]** and secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in **Outline LEMP [REP1-064]**. The provision of this grass cover all year round will significantly improve soil stabilisation as studies have shown that grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements of the Scheme will therefore not increase surface water flood risk to properties downstream of Sub-Sites 8A and 8B. The **Outline OEMP [REP1-060]** – states that the detailed operational drainage design would be carried out pre-construction with the objective of ensuring that drainage of the land to the present level is maintained, and that if during the construction of any of the infrastructure there is any interruption to existing schemes of land drainage, new sections of drainage would be constructed.
WR-WAT-012	Comments referred to previous flood events in Long Stratton.	The Applicant confirms that Site 4 is not located within Flood Zone 3, it is located within Flood Zone 1 as assessed within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052]**.

ID	Comments/Issues Raised	Applicant's Response
		It is acknowledged that narrow surface water flow routes exist within Sub-Site 4B, however infrastructure will be located at least 10m away from the ordinary watercourses/at a suitable distance from these flow routes so that they are preserved, as secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The majority of Sub-Site 4B will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in **Outline LEMP [REP1-064]**. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown, grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements of the Scheme will therefore not increase surface water flood risk to properties downstream of Sub-Site 4B or other areas of the Order Limits. As outlined in Section 9 of **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052]**, the 132kV Project Substation will have lined surface drainage system with a controlled discharge to watercourse at the QBAR rate which will provide a betterment over the existing scenario for higher return periods. The detailed surface water drainage design is secured through **Draft DCO [REP1-014]**. The detailed surface water drainage design is secured through DCO Requirement 11. Based on the above, the Scheme will not increase flood risk from any source at the Site or elsewhere.

ID	Comments/Issues Raised	Applicant's Response
WR-WAT-013	Concerns were raised regarding flood risk at Site 5.	The majority of Sub-Site 5 will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in **Outline LEMP [REP1-064]**. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown, grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements of the Scheme will therefore not increase surface water flood risk to properties or roads downstream of the Order Limits. As outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052],** the 400kV Project Substation will have lined surface drainage system with a controlled discharge to watercourse at the QBAR rate which will provide a betterment over the existing scenario for higher return periods. The detailed surface water drainage design is secured through DCO Requirement 11.
WR-WAT-014	Comments referred to the impact to Starston Brook and downstream impacts on Waveney River, Valley and Hundred Lane.	As set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052]**, the Order Limits were amended post Statutory Consultation to exclude the areas of Flood Zones 2 and 3 associated with the Starston Brook. The BESS, National and Project Substations have been located within Flood Zone 1 and outside of areas of 'low' to 'high' surface water flood risk with the exception of localised areas which are due to topographic depressions. Whilst watercourses within the Study Area identified within **ES Volume 1, Chapter 9 - Water Environment [APP-045]** connect to the Waveney River and are in proximity to Hundred Lane, with

ID	Comments/Issues Raised	Applicant's Response
		the incorporation of the embedded mitigation measures set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** the effects on these receptors are 'Not Significant', with the exception of the cessation of agricultural use/fertiliser which is 'Significant Major Beneficial'.
WR-WAT-015	Concerns were raised regarding the impact to private and local water supplies.	Water resources, including potable water supply for the Scheme, has been assessed within **ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]**. Tankering is considered to be the main option for water supply, as committed to in the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]** that are secured through Requirements 13 and 14 of the **Draft DCO [REP1-014].** Licenced abstractions and private water supplies have been considered in **ES Volume 1, Chapter 9 – Water Environment [APP-045]** and **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** in relation to the potential for contamination. **ES Volume 2, Figure 16.5 - Locations of Private Water Supplies [APP-109]** shows licenced abstractions and water wells. The details of water wells permitted and private water supplies are presented in Table 3.10 and Table 3.11 **of ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184** to **APP-186]**. Mitigation measures to protect waterbodies from pollution are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014]**. As such, the impacts water supplies are assessed within ns and private water supplies have been considered in **ES Volume 1,**

ID	Comments/Issues Raised	Applicant's Response
		Chapter 9 – Water Environment [APP-045] and **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** as 'Not Significant'.
WR-WAT-016	Comments referred to the low pressure of local water supplies and asked whether this would impact the operation of the Scheme.	The Applicant acknowledges the concerns raised in regard to water supply. **ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]** assesses the water demand for all phases of the scheme. The assessment has concluded that a potable and non-potable water supply demand balance can be reached with embedded mitigation. Water neutrality options have been given priority to reduce the supply requirements. Tankered water was identified as the preferred method for potable supply and rainwater harvesting and on-site storage for non-potable supply. The EA and Anglian Water have also commented on the application. The EA has confirmed that they are satisfied with the option appraisal. Anglian Water also have a strategy for the provision of water for third party users above 20,0000 m^3/d which requires an application. This further protects the local water supply of public and private water. The Applicant welcomes continued engagement with the EA and Anglian Water throughout the Examination process, an continues to progress engagement through the Statement of Common Ground to be submitted again at Deadline 3. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand. This approach is being undertaken in order to not impact the local private water supplies.

ID	Comments/Issues Raised	Applicant's Response
WR-WAT-017	Comments referred to surveys on private sewage and water connectivity.	The Applicant notes this comment. Private sewerage has not been surveyed and was not identified at the EIA Scoping stage as a receptor that required assessment within **ES Volume 1, Chapter 9 - Water Environment [APP-145]**. It is uncertain what is meant by 'water connectivity', however Anglian Water sewer locations have been identified through obtaining the sewer records for the area and watercourses have been identified and assessed within **ES Volume 1, Chapter 9 - Water Environment [APP-045]**. As such there is no anticipated effects that would prompt a public health concern.
WR-WAT-018	Comments noted the need for a substantial amount of water in the event of a fire.	The Applicant acknowledges the concerns raised and confirms that the Scheme does include a provision of water in the event of an incident. This is outlined in **ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]** and includes an allowance of 456m^3. This allows for 1500 litres per minute flow for 5 hours and so exceeds the current NFCC guidelines which stipulates that a minimum volume of 180m3 to provide 2 hours of firefighting water should be provided. This volume of firefighting water represents the minimum amount of water required and is recommended to be stored in two tanks to provide redundancy.
WR-WAT-019	Comments referred to a restricted and partly subsided drainage pipe beneath the lane at Site 9. The Applicant was requested to assess the condition of this and perform capacity checks. This also included implementing construction protection and providing clear maintenance and repair arrangements.	The Applicant notes the concerns raised. The Applicant confirms that drainage features and crossings are addressed in the FRA and Outline Surface Water Drainage Strategy. Detailed drainage, protection, inspection, pollution-prevention and maintenance measures require approval and are secured through the Outline CEMP and DCO. The Applicant also notes that protective provisions require approval of works that may affect statutory water and sewerage apparatus, include requested stand-off

ID	Comments/Issues Raised	Applicant's Response
		distances and provide a mechanism for clash detection and continued engagement during detailed design and construction.
WR-WAT-020	Comments noted previous instances of flooding and constrained drainage at Market Lane, Boylandhall Lane and through Saxlingham Nethergate. The Applicant was requested to produce location-specific runoff modelling, drainage surveys and construction monitoring at Site 8.	The Applicant notes the concerns raised in relation to flooding issues around Market Lane (Sub-Sites 8A/8B), Boylandhall Lane (western boundary of Sub-Site 5A) and Saxlingham Nethergate (located c.400m north-west of Sub-Site 7D). The elements of the Scheme proposed for these Sub-Sites is predominantly Solar PV Arrays which will be raised on narrow supports at an appropriate freeboard above ground level/anticipated flood depths. The ground beneath the Arrays will be natural grass cover and runoff from the Arrays will drip onto the ground via the multiple gaps across the Array surface and percolate into the soil, thereby mimicking the existing drainage regime. This is secured within the **Design Principles, Parameters and Commitments [REP1-078]**. Where built infrastructure is proposed that will increase impermeable areas within these Sub-Sites (standalone converter/inverter units and Project Substations), these will have appropriate surface water management measures, with detailed design secured through DCO Requirement 11. Flood risk from all sources, including climate change, is assessed in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-152 and REP1-154]**. The drainage strategy is intended to mimic existing drainage and avoid increasing flood risk, with detailed schemes secured through Requirement 11 and the Outline CEMP. The Applicant's position is that flood-risk activities and mitigation are

ID	Comments/Issues Raised	Applicant's Response
		controlled through the Draft DCO and relevant management plans, with ongoing engagement with the Environment Agency on the proposed disapplication of Flood Risk Activity Permits.
WR-WAT-021	Comments referred to an actively used private borehole, which was not included in the Applicant's assessment.	The Applicant notes the concerns raised. Groundwater and water-quality effects are assessed **ES Volume 1, Chapter 9 - Water Environment [APP-045]**, with pollution prevention and monitoring measures set out in the **Outline CEMP [REP1-058]**. The Applicant considers the secured mitigation would avoid detrimental effects on water quality or quantity, and identified private supplies would be addressed through detailed controls. The Applicant confirms that utilities and water infrastructure are considered in the ES and that works affecting Anglian Water apparatus are subject to protective provisions requiring technical approval, stand-off distances and asset-protection measures. The Applicant encourages any person with a private borehole, which they believe has not been assessed, to reach out to the Applicant.
WR-WAT-022	Comments referred to the impact of crossings within the River Tas. The Applicant was requested to produce a whole-water-body WFD assessment, detailing crossing methods and controls for sediment, pollution and drilling-fluid breakout.	The Applicant notes the concerns raised. Watercourse crossings and effects on the River Tas water body are addressed in the **Water Framework Directive Assessment [REP1-056]** and **ES Volume 1, Chapter 9 - Water Environment [APP-045]**. Crossing methods remain subject to detailed design, with sediment, pollution and drilling-fluid controls secured through the **Outline CEMP [REP1-051]** and relevant approvals. The Applicant is having ongoing discussions with the Environment Agency regarding the location and nature of relevant flood risk activities,

ID	Comments/Issues Raised	Applicant's Response
		together with the applicable commitments and mitigation measures.

3.15 Cultural Heritage

Table 3.15 Cultural Heritage

ID	Summary of Representation	Applicant's Response
WR-CUL-001	Comments raised concerns on the impact to local heritage assets.	An assessment of heritage assets, including Conservation Areas and listed buildings, is provided in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 Heritage Statement [APP-165** to **APP-168]**. As described in the **Design Approach Document [APP-212]**, heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example, reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. During the design process, regard has been had to Boudicca Way during the construction traffic routing, the siting of infrastructure within the Scheme and the **Green Infrastructure Strategy [REP1-013]** to minimise impacts as far as possible. An assessment of Boudicca Way from a visual amenity perspective is provided in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**. Construction vehicles in respect of Boudicca Way will be managed through the **Outline PRoWPPMP [APP-203]**, which sets out anticipated closures and management of PRoW. A detailed PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with Requirement 17 of the **Draft DCO [REP1-014]**. The Roman Pye Road bisects Site 4. As outlined in **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, further stages of informative trenching will be undertaken

ID	Summary of Representation	Applicant's Response
		within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCC HES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme.
WR-CUL-002	Comments referred to the impact to listed buildings.	An assessment on listed buildings, is provided in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]**. The study area extends to 5km from the Sites for the highest-grade heritage assets (i.e. World Heritage Sites, Scheduled Monuments, Grade I and Grade II* Listed Buildings). A study area of 2km has been adopted for the remaining designated heritage assets (i.e. Grade II Listed Buildings and Conservation Areas) and 1km for non-designated heritage assets and HER entries. These study areas were determined based on professional judgement and were presented to all statutory consultees at PEIR stage. As noted within the **Consultation Report [APP-024],** in Historic England's PEIR Response from August 2025, it is noted that they *'broadly agree with the scope and methodology of the cultural heritage and archaeology assessments' as presented at PEIR stage, and further agree 'with the proposed extents of the study areas for different heritage assets and welcome the flexible approach based on the Zone of Theoretical Visibility and ground-truthed walkover surveys.'* The Applicant considers that these assessments have been produced in line with the relevant legislation, planning policy and professional guidelines, and are considered to be robust and appropriate for the assessment of the Scheme.

ID	Summary of Representation	Applicant's Response
		As described in the **Design Approach Document [APP-212]**, heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets.
WR-CUL-003	Comments referred to the impact to historical churches.	Assessment of Churches which were considered to be sensitive to development within the Scheme were assessed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. It was considered that due to the embedded and proposed mitigation within the Scheme, there would be no harm to the significance of churches and, in several cases, their settings will be improved by proposed mitigation measures.
WR-CUL-004	Concerns were raised regarding the impact to ancient lanes and tracks.	The characteristics of the local road network have been assessed within **ES Volume 1, Chapter 11 -Transport and Access [APP-047]** and have informed the development of the access strategy. The **Outline CTMP [REP1-068]** includes a range of management measures, including designated routes, vehicle booking systems and traffic management measures, to minimise impacts on the Local Highway Network. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which have any particular heritage value of equivalence to a non-designated heritage assets. Views from footpaths, including those of heritage assets, have been assessed in **ES Volume 1, Chapter 7 –**

ID	Summary of Representation	Applicant's Response
		Landscape and Visual [APP-043] and mitigated where potential impacts were identified.
WR-CUL-005	Comments referred to impacts to local conservation areas.	The Applicant notes that potential impacts to Brooke and Kirstead, Saxlingham Green, Saxlingham Nethergate and Fritton Conservation Areas were assessed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]**. The Applicant refers to its response to CUL-011 in relation to impacts to Fritton. These assessments noted that detailed assessments of Hempnall and Shotesham Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme, though impacts to Saxlingham Nethergate Conservation Area were included in the potential impacts along AIL routes. The assessments concluded that its location along the AIL route will not result in any impact to the character and appearance of the conservation area. The significance of the Brooke and Kirstead Conservation Area is vested in its preserved historic character as a rural village The interrelationship between its historic buildings and the development of the village from medieval times onwards is the main contribution to both this assets significance and setting. Within the conservation area itself, a sense of enclosure is experienced with houses fronting onto the roads lined with mature vegetation, which provides an inward facing atmosphere and strong sense of tranquillity. Tree belts exist along the settlement

ID	Summary of Representation	Applicant's Response
		edges, with views of the countryside from within the village itself, and vice versa, very limited. The Scheme is largely screened from the Conservation Area due to the presence of the mature vegetation surrounding much of the village; however, it is acknowledged that views between Site 9 and the cricket club exist, with this complex situated to the south of the main core of the village, beyond the southern treeline. However, this intervisibility is not considered to be a significant viewpoint within the conservation area. The High Green area of the Brooke & Kirstead Conservation Area (at its south-westernmost corner) extends to within c. 130m north of Site 9, at their nearest points. As part of the design process, the south-western approach into the conservation area was considered, as when travelling north into the High Green area, these views could include glimpsed views of the western part of Site within their vistas. As such, Solar PV Panels were entirely removed from the western half of Site 9, with these areas to be retained as agricultural land. The removal of Solar PV Panels from the western half of Site 9 will also help retain the rural backdrop for the westernmost part of the conservation area, with this rural backdrop noted as being an important landscape gap. It is further noted in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** that the setback established south of Church Hill, between Saxlingham Green and Saxlingham Nethergate, has been established primarily due to archaeological sensitivity within this area. The other setbacks in Sub-Site 7D and the northern part of Sub-Site 7F include the removal of Solar PV Panels from those fields which are situated adjacent the eastern and western approaches into the conservation area, with these areas to be

ID	Summary of Representation	Applicant's Response
		retailed as grassland. Several linear belts of broadleaf woodland will also be established within the northern parts of Sub-Site 7D and 7F, continuations of established woodland already present within the landscape south of Saxlingham Green. The significance of Saxlingham Green derives primarily from its preserved historic settlement layout, with the surrounding vegetation helping to enclose the village from views across the surrounding rural landscape. While there are a few gaps in the surrounding vegetation, these will be mitigated by proposed landscaping within Sub-Site 7D and 7F. These landscaping initiatives will ensure that the Scheme does not encroach upon Saxlingham Green. As described in the **Design Approach Document [APP-212]**, heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets. Construction vehicle routes have been selected with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable. However, it is acknowledged that Abnormal Indivisible Loads (AIL) will pass through Conservation Areas. Mitigation measures relating to construction traffic is set out in the **Outline CTMP [REP1-068]**. In accordance with Requirement 15 of the **Draft DCO [REP1-014]** a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority. AIL movement will be carefully planned and will be undertaken under licence with the Highway Authority to ensure safe operation

ID	Summary of Representation	Applicant's Response
		and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. AIL movements will be undertaken using strict traffic management, and notification of these types of movements will be communicated in advance. **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** concludes that there will be no direct, physical impacts to any heritage assets along the proposed AIL routes.
WR-CUL-006	Comments referred to impacts to the War Memorial and Old Rectory in Saxlingham Nethergate.	The Applicant notes the concerns regarding the War Memorial and the boundaries of the Grade II* Listed Old Rectory in Saxlingham Nethergate. The Applicant can confirm that no part of the registered title of either the War Memorial or The Old Rectory falls within the Order Limits. Accordingly, no powers of compulsory acquisition or acquisition of rights are sought over either property and neither title are within the scope of the Scheme. As set out in the **Land Plan [APP-006]** page 5 (sheet 3) and the **Book of Reference [REP1-018]** the only land plots in this location for which rights are sought are Plots 03-001 and 03-002. Both plots are located wholly within adopted highway land. No rights are sought over land outside the adopted highway, including any land forming part of the curtilage of the War Memorial or The Old Rectory, for AIL movements or any other purpose. Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the **Outline CTMP**

ID	Summary of Representation	Applicant's Response
		[REP1-068] to ensure the protection of nearby assets, including the War Memorial and The Old Rectory.
WR-CUL-007	Comments referred to the Grade II listed Church Farm and adjoining Fritton Conservation Area, which are located close to the Project Substation in Site 5.	The Applicant has sought to reduce adverse effects on these receptors and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. At Site 5 the 400kV Project Substation has been sensitively sited centrally within the development area maximising the screening benefits of existing vegetation and maximising the setbacks from a number of receptors including local PRoW, residential properties and heritage receptors. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. Furthermore, the **Green Infrastructure Strategy [REP1-013]** seeks to retain and enhance existing vegetation, to aid the integration of the Scheme and Substation within the environment. A combination of new hedgerow with trees, tree planting and hedgerow improvements are proposed to respond to existing characteristic features and aid visual screening of the Scheme; whilst supporting biodiversity and green infrastructure connectivity. The Applicant notes that assessments of potential impacts to Fritton Conservation Area and the Grade II Listed Buildings at Church Farm have been provided within **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. The assessment has concluded that based on the existing environmental baseline, as well as the proposed landscape

ID	Summary of Representation	Applicant's Response
		mitigation, the Scheme will cause no harm to these heritage assets.
WR-CUL-008	Comments noted the potential impact of construction traffic on heritage assets.	The Applicant notes that traffic surveys recorded existing movements by HGVs on the Local Road Network within the Study Area, as detailed in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. Potential impacts to heritage assets from the vibration of traffic were scoped out (see **ES Volume 1, Chapter 12 -Noise and Vibration [APP-048]**. The effects of vibration from the construction of the Scheme (excluding the CRC) are considered within **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]** for receptors up to a distance of 100m from vibration-generating construction activity. Vibration effects from the CRC are scoped out of these assessments. It was concluded that there is no potential for any swipes or strikes to heritage assets within the Order Limits, nor is it considered that there will be any direct impacts upon heritage assets by vibration.
WR-CUL-009	Comments referred to the historic Hundred Lane.	The Applicant notes the concern regarding Hundred Lane, which bisects Site 1. Any construction effects on this link would be temporary in nature and managed through the measures set out in the **Outline CTMP [REP1-068]** alongside the **Outline PRoWPPMP [APP-203]**. Detailed management plans will be prepared substantially in accordance with the outline management plans and will be approved by the relevant planning authority in consultation with the relevant highway authority pursuant to the Requirements of the **Draft DCO [REP1-014]** prior to construction.

ID	Summary of Representation	Applicant's Response
		The Applicant notes the historic and archaeological background of the area has been provided within **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]**. No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from PRoW, including those on Hundred Lane, have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**.
WR-CUL-010	Concerns were raised regarding the impact to the former RAF Hardwick / Seething sites.	The Applicant notes that both the former RAF Seething and former RAF Hardwick airfields were included for assessment within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021].** The former WWII airfields were once considerably larger than the existing airfields present beyond the Scheme, with RAF Seething once extending into Site 10, as seen in the geophysical survey results presented within **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022].** Solar PV Panels have been removed from a portion of the footprint of RAF Seething which falls within Site 10. RAF Hardwick also once extended into the eastern part of Site 3. The Applicant notes within the **Site Selection Assessment [APP-215]**, a larger area of the former Airfield was included within the Scheme boundary at EIA scoping stage; however, it was removed from the Scheme owing to a combination of factors, including a high unexploded ordnance risk. For the small area of the airfield which falls within Site 3, as seen in the geophysical

ID	Summary of Representation	Applicant's Response
		results presented in **[AS-022],** Solar PV Panels have been removed from the majority of the former airfield footprint. The Applicant notes that the removal of the fields within the Scheme in which remains of the former WWII Airfields survive below-ground from the crop cycle will reduce the impact of their degradation via ploughing for a number of years, which will, in turn, help conserve what remains of the former Airfields below-ground within the Scheme. The Applicant further notes that the various below ground impacts of the Scheme have been discussed with NCCHES and have been used to inform **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**. In consultation with NCCHES, the AMS has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known. This will ensure preservation in proportion to the significance of archaeological remains present. This includes the option for localised areas of above ground cabling to preserve significant archaeological remains in situ where it is not practicable or desirable to mitigate by archaeological excavation. Likewise, within the Solar PV Array areas of the Scheme, the targeted and localised use of concrete feet rather than piles to support the Solar PV structures will also be available.
WR-CUL-011	Comments referred to the impact of construction traffic and vibration on heritage assets, such as the medieval stained glass	The Applicant notes the concerns raised regarding the Grade II* Listed Church of St Mary the Virgin (NHLE 1050666) within the village of Saxlingham Nethergate. This structure, as stated in the

ID	Summary of Representation	Applicant's Response
	and other sensitive features of St Mary's Church.	Consultee's representation, is a medieval (and later) church which contains important fragments of medieval stained glass, the latter of which is also noted in this designated asset's Historic England listing description. The Applicant notes that effects from vibration from traffic were scoped out of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. An assessment of construction noise and vibration for receptors up to a distance of 100m is presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, with an assessment of effects of heritage assets, including listed buildings, also provided in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. These documents note that environmental changes during the Construction Phase of the Scheme, particularly noise and vibration, are not expected to be any more than negligible. Construction vehicle routing has been developed in consultation with NCC as the Local Highway Authority, with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable, as set out in the **Outline CTMP [REP1-068]**. Mitigation measures to control noise and vibration during construction are set out within the **Outline CEMP [REP1-058]**. The Applicant further acknowledges that Church Hill has also been identified as a potential Abnormal Load Route (AIL), for no more than ten AIL movements. An assessment of all AIL movements is set out within **ES Volume 1, Chapter 11 –**

ID	Summary of Representation	Applicant's Response
		Transport and Access [APP-047] and **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 – APP-177]** which includes an AIL report in Appendix D. As set out within the **Outline CTMP [REP1-068]**, Church Hill may be utilized on occasion for the movement of AILs, and any such movements will be carefully planned and managed in accordance within a detailed CTMP, which must be approved by the relevant planning authority in consultation with the relevant highway authority. Any AIL movements through Saxlingham Nethergate would be carried out by specialist haulage contractors to ensure the protection of heritage assets along the route, including all Listed Buildings within Saxlingham Nethergate. Based on traffic data obtained at ATC6 and ATC7 and reported within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, a number of rigid vehicles with four or more axles and articulated lorries already travel along The Street and Broaden Lane. Properties fronting these roads are therefore already exposed to comparable vehicle movements and associated vibration levels with those that would be generated by the limited number of AIL movements required for the Scheme. The Church of St Mary the Virgin is situated c. 100m north of Church Hill, north of The Old Rectory and Old Rectory Cottage. Given this assets distance from the road, it is considered that there will be no harm to the Church or its stained glass windows by traffic movement along Church Hill. As such, it is considered that detailed monitoring and assessment of this heritage asset is not required.

ID	Summary of Representation	Applicant's Response
WR-CUL-012	Comments referred to heritage assets near Sites 5 and 7, and along the AIL route.	The Applicant notes the concerns raised. The Applicant confirms that effects on listed buildings, conservation areas and other assets within the vicinity of Site 5 and 7, as well as along the AIL route, have been assessed by reference to significance and setting within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, which is supported by **ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 – APP-168].** The Applicant's position is that designated and non-designated built-heritage assets have been assessed using an agreed methodology with both Historic England and SNDC. As noted within the above documents, as well as within **ES Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**, heritage mitigation has been incorporated into the Scheme design, including around Sites 5 and 7. Historic England, in their written representation **[REP1-186]** within **The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies [EXAM/9.29]** under comment ID WR-HE-001, state that they *"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."* Residual effects have been considered in the planning balace and controls secured through the DCO, and the embedded and proposed mitigation is appropriately reflected in the assessment of heritage assets. The Applicant acknowledges the concerns raised regarding potential heritage effects associated with highway works required

ID	Summary of Representation	Applicant's Response
		to facilitate construction of the Proposed Development, including those associated with the proposed AIL route. The proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs. **Environmental Statement Volume 2: Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]** identifies the proposed AIL route to the Scheme. Section 6 of the **Outline Construction Traffic Management Plan [APP-201]** sets out the framework for the management of AIL movements, including the safety measures that would be implemented to facilitate these movements. Further detail regarding the management of AIL movements would be provided within the detailed Construction Traffic Management Plan, which would be secured through the DCO requirements. AIL movements are expected to be infrequent and occur only on a limited number of occasions during the construction period. Where temporary alterations to highway infrastructure are required to facilitate AIL movements, these would be reinstated following completion of the relevant works and returned to their previous condition, where appropriate.
WR-CUL-013	Concern was raised regarding the removal of ancient hedging and the subsequent reduction in biodiversity in Site 9.	During the production of **ES Volume 3, Appendix 10.2 – Archaeological Desk-based Assessment [AS-020 – AS-021]**, hedgerows of potential archaeological and historic importance were identified, according to the criteria laid out within the Hedgerow Regulations 1997. Regulation 8(4) indicates that a hedgerow is 'important' if:

ID	Summary of Representation	Applicant's Response
		iii) it has been in existence for 30 years or more, and iv) it satisfies at least one of the criteria set out in Part II of Schedule 1 to the Regulations. Hedgerows of archaeological and historic importance are identified by the criteria in paragraphs 1 to 5 of Part II, Criterion 1, which states: Schedule 1 Additional Criteria for Determining 'Important' Hedgerows Part II: Criteria Archaeology and History Paragraph 1. The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township; and for this purpose 'historic' means existing before 1850. Paragraph 2. The hedgerow incorporates an archaeological feature which is: (a) included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Archaeological Areas Act 1979; or (b) recorded at the relevant date in a Sites and Monuments Record. Paragraph 3. The hedgerow: (a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and

ID	Summary of Representation	Applicant's Response
		(b) is associated with any monument or feature on that site. Paragraph 4. The hedgerow: (a) marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a Sites and Monuments Record or in a document held at that date at a Record Office; or (b) is visibly related to any building or feature of such an estate or manor. Paragraph 5. The hedgerow: (a) is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts; or (b) is part of, or visibly related to, any building or other feature associated with such a system, and that system: (i) is substantially complete; or (ii) is of a pattern which is recorded in a document prepared before the relevant date by a local planning authority, within the meaning of the 1990 Town and Country Planning Act, for the purposes of development control within the authority's area, as a key landscape characteristic. Further detail and guidance relating to the identification and documentation of archaeologically and historically important hedgerows is provided by The Hedgerow Regulations 1997: A Guide to the Law and Good Practice (DoE). Additionally, the interpretation of Schedule 1 Part II, Paragraph 5 has been defined by a Judicial Review case (Flintshire County Council v NAW & Mr

ID	Summary of Representation	Applicant's Response
		J T Morris), with a subsequent amendment to the guide issued by DEFRA in 2002. The Hedgerow Regulations 1997: A Guide to the Law and Good Practice (DoE) clarifies that the phrase 'pre-dating the Inclosure Acts' should be taken to mean before 1845 (whether or not Inclosure Acts exist for the area in question). Eight sections of hedgerows were identified within Site 9 during summer 2024 which were classified as 'important', including the two stretches identified by the Consultee. These hedgerows mark boundaries identified on the 1801 Brooke Enclosure, the c. 1840 Brooke Tithe, and subsequent 19th-20th century Ordnance Survey maps, as illustrated below. These identified hedgerows were considered to fulfil criterion 5(a) of the Hedgerow Regulations 1997, as they form part of a field system pre-dating the Inclosure Acts, and are not currently within the curtilage of, or forming the curtilage boundary, of adjacent dwellings.  Site 9 'important' hedgerows

ID	Summary of Representation	Applicant's Response
		 1801 Brooke Enclosure Map  Approximately 1840 Brooke Tithe Map

ID	Summary of Representation	Applicant's Response
		As noted within **ES Volume 3, Appendix 10.2 – Archaeological Desk-based Assessment [AS-020 – AS-021]**, pg. 146, as part of the construction phase of the Scheme, limited hedgerow removal is proposed. The management of historic hedgerows will be undertaken in accordance with the Hedgerow Removal Plan as set out in the **Outline LEMP [REP1-064]**. Where removal is deemed necessary, it will be kept to no more than 10m, in accordance with the **Outline LEMP [REP1-064]**. Horizontal Directional Drilling (HDD) has been proposed where cable route construction has the potential to impact 'important' hedgerows, where feasible, to avoid the requirement of inserting new openings. No excavation will be undertaken within the root protection areas (RPA) of identified hedgerows, and all work will comply with the requirements as shown on the **Hedgerow and Tree Protection Order Plan [AS-004]**. Where practicable to do so, sections of removed hedgerows will be reinstated directly following construction works. The approach for reinstatement/replanting of hedgerows is discussed within the **Outline LEMP [REP1-064]** and will be detailed further within the LEMP secured by Requirement 7 of the **Draft DCO [REP1-014]**. The reinstatement of important hedgerows will help maintain the historic field patterns within the area.

3.16 Recreation and Public Rights of Way

Table 3.16 Recreation and Public Rights of Way

ID	Summary of Representation	Applicant's Response
WR-REC-001	Comments referred to the potential impact to recreational routes. This includes the temporary and permanent effects on local PRoWs, such as FP19, FP22 and RB19.	The **Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]** provides the framework for closures, diversions and managed access associated with the Scheme including FP19, FP22 and RB19. Route-specific measures, including the timing of any temporary restrictions and the provision of diversion routes where required, would be developed through the final secured plan to maintain the safe operation of the network and minimise disruption to users. A 15m buffer to PRoW has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [REP1-078]**. The Applicant is also committed to the provision of new permissive paths and community accessible space, as set out in the **Design Principles, Parameters and Commitments [REP1-078]** and **Outline LEMP [REP1-064] (**which is a secured document) which will provide opportunities for access and recreation. These measures will provide additional opportunities for access and recreation during the operational phase of the Scheme. The interaction between the Scheme and the PRoW network has been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **Outline PRoWMPPMP [APP-203]**. The assessment considered the effects of construction traffic, temporary PRoW closures, diversions and managed crossings on users of the PRoW network.

ID	Summary of Representation	Applicant's Response
		The Applicant acknowledges the importance of the local PRoW network for both recreation and connectivity. Where temporary impacts on PRoWs are required during construction, appropriate management and mitigation measures are proposed, including signage, alternative routes where necessary, traffic marshal support, reduced vehicle speeds in areas where construction traffic interacts with PRoW users, and advance notification of closures. No permanent closures of PRoWs are proposed as part of the Scheme. Any PRoWs temporarily affected during construction will be reinstated and reopened following completion of the relevant works. For FP19, FP22 and RB19 please see Table 4.1 in the **Outline PRoWMPPMP [APP-203].**
WR-REC-002	Comments noted that the new permissive paths and existing paths will be narrowed and fenced off, becoming 'industrial corridors.' Other comments referred to concerns regarding the safe use of diverted recreational routes.	A minimum 15m offset (including security fencing) from all PRoW is secured through the **Design Principles, Parameters and Commitments [REP1-078]**. In respect of the new permissive paths, the **Design Principles, Parameters and Commitments [REP1-078]** secure a minimum usable width for pedestrian access of 2m, with permissive paths having a 15m buffer to any infrastructure (excluding landscaping) associated with the Scheme. An **Outline PRoWPPMP [APP-203]** has been prepared to provide a framework for the management of PRoW, promoted walking routes and permissive paths, with the key objective being to ensure that these routes remain open and safe to use throughout the Scheme's construction, operational and decommissioning phases, where practicable. Management measures secured in the **Outline PRoWPPMP [APP-203]** to protect user safety include the installation of signage along the PRoW to inform users about

ID	Summary of Representation	Applicant's Response
		construction activity, drivers yielding to all PRoW users (including equestrians), the widening of access tracks where applicable to allow vehicles to pass PRoW users safely, the positioning of Traffic Marshals or Banksmen where relevant along a PRoW impacted by construction traffic to hold vehicles if a PRoW user is present, speeds limited to 5–10mph near PRoW, and keeping the PRoW clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable.
WR-REC-003	Comments referred to the impact to horse riders and bridleways.	A 15m buffer to PRoW/bridleways has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [REP1-078]**. **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** consider fear and intimidation on non-motorised users on roads, which includes horse riders. Measures to manage traffic and access in relation to horse-riding activity and bridleways are provided in the **Outline CEMP [REP1-058]**, **Outline CTMP [REP1-068], Outline OEMP [REP1-060]** and **Outline OTMP [APP-202]**. These include measures such as requiring drivers to yield to equestrians, reduced vehicle speeds where construction traffic interfaces with PRoWs and bridleways, the use of traffic marshals where appropriate, signage to inform users of construction activities, and management of construction vehicle movements to minimise interactions with non-motorised users, including horse riders. An **Outline PRoWPPMP [APP-203]** has also been prepared which provides an assessment of PRoW and permissive paths, including bridleways, during construction, operational, and decommissioning phases. Where temporary closures are necessary to ensure safety, measures will include keeping PRoW

ID	Summary of Representation	Applicant's Response
		clear of construction vehicles and apparatus outside of permitted construction hours as far as practicable to do so, and for any damage to the surface of the PRoW directly attributable to the Scheme to be repaired as soon as practicable. The surface will be made good and return to its original condition following construction. The PRoW management measures will be developed further in the detailed **PRoWPPMP** to be secured by Requirement 17 of the **Draft DCO [REP1-014]**.
WR-REC-004	Comments referred to the diversion or temporary closure of recreation routes. The Applicant was requested to keep this to a minimum and provide clear alternative routes.	An **Outline PRoWPPMP [APP-203]** has been prepared which provides an assessment of PRoW and permissive paths, including bridleways, during construction, operational, and decommissioning phases. Where temporary PRoW closures are proposed, alternative routes have been detailed in the **Outline PRoWPPMP [APP-203]** and have been designed where practicable to facilitate a reasonable alternative route during the temporary closure. The PRoW management measures will be developed further in the detailed PRoWPPMP to be secured by Requirement 17 of the **Draft DCO [REP1-014]**.
WR-REC-005	Comments referred to the impact to Boudicca Way and other important local footpaths.	The effects on PRoWs and permissive paths, including Boudicca Way, have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **Outline PRoWPPMP [APP-203]**. Where temporary impacts are required during construction, mitigation measures including signage, alternative routeing, traffic marshal support and reduced vehicle speeds are proposed to minimise disruption and maintain safe access. No permanent closures of PRoWs are proposed and any PRoWs temporarily affected during construction will be reinstated and reopened following completion of the relevant works.

ID	Summary of Representation	Applicant's Response
		A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Further, a visual amenity assessment of Public Rights of Way is present in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. This includes assessment on Boudicca Way and PRoW. The Applicant acknowledges that the assessment identifies significant visual effects for users of certain PRoWs, particularly during the construction phase and, in some locations, there is significant effect in Year 15. The ES also recognises the High sensitivity of recreational receptors, including users of the Boudicca Way and Via Beata Way. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening / reinforcing existing hedgerows, new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**.

ID	Summary of Representation	Applicant's Response
		Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**.
WR-REC-006	Comments referred to the impacts to Hundred Lane, Broadgate Lane, Narrowgate Lane and the footpath off Hundred Lane towards Tivetshall Church.	As stated in the **Outline PRoWPPMP [APP-203]**, no permanent closures of public roads or PRoWs are proposed as part of the Scheme including Hundred Lane, Broadgate Lane and Narrowgate Lane. Whilst some temporary closures or management measures may be required during construction, these would be subject to appropriate mitigation, and any affected PRoWs would be reopened following completion of the relevant works. For specific PRoWs impacted during construction please see Table 4.1 in the **Outline PRoWMPPMP [APP-203].**
WR-REC-007	Comments referred to the impact to Footpath 6 in Brooke.	A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Further, a visual amenity assessment of Public Rights of Way is present in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]** and on residential properties in **ES Volume 3, Appendix 7.8 Residential Visual Amenity Assessment [REP1-046]**. Visual effects on Footpath 6 are assessed. The hedgerow along Footpath 6 will be

ID	Summary of Representation	Applicant's Response
		reinforced with trees to screen the view towards solar PV from the footpath. A **Green Infrastructure Strategy [REP1-013]** has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [REP1-064] (**which is a secured document) through a Requirement in the **Draft DCO [REP1-014]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, respectively via the **Draft DCO [REP1-014]**. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Evidence for the need for the Scheme is set out in the **Statement of Need [APP-206]**. Noise is addressed in **ES Volume 1 Chapter 12 – Noise and Vibration [APP-048]**, which concludes that no residual significant effects have been identified during the construction, operation and maintenance and decommissioning phases.
WR-REC-008	Comments referred to the impact to Via Beata.	The Applicant notes the concern raised in relation to the Via Beata. The Via Beata is considered within the **Outline PRoWPPMP [APP-203].** The only direct interaction between the

ID	Summary of Representation	Applicant's Response
	Other comments referred to the impact to recreational routes near Site 1.	route and the Order Limits is the Via Beata crosses the Order Limits within the southern extent of CRC4 along Wood Lane. As set out in the **Design Approach Document [APP-212]**, the Scheme has adopted mitigation measures that ensure the level of change for users of the PRoW network are kept to a minimum, including a minimum 15m offset to Solar PV Arrays (including security fencing) from all PRoW, a general strategy for the strengthening and gapping up of hedgerows along PRoW, and limiting crossings of all PRoW to reduce disruption of their use during construction and operation. The Scheme has been designed to respect and enhance the experience of people using quiet lanes, PRoW and key recreational routes, including the Boudicca Way and Via Beata Way. The landscape and visual effects on the Via Beata and on paths in the vicinity of the National Grid Substation. have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**. During the construction phase, the **Outline PRoWPPMP [APP-203]** provides a framework to ensure that the Via Beata remains open and safe to use wherever practicable.

3.17 Transport and Access

Table 3.17 Transport and Access

ID	Comments/Issues Raised	Applicant's Response
WR-TRA-001	Comments referred to the use of local roads, noting that these are unsuitable. The roads were described as narrow and rural in nature.	During the design process, consideration was given to limiting movements through communities such as Hempnall, Brooke and Saxlingham Nethergate as far as practicable, together with considering the most suitable access routes and locations. Factors considered are set out in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, which includes the internalisation of construction haul routes, where possible, to minimise impacts. Measures also include the use of a vehicle booking system and vehicle holding areas to proactively manage construction vehicle movements to site and ensure impacts on the rural and local road network is reduced where practicable, as described in the **Outline CTMP [REP1-068]**. The proposed access strategy has been developed in consultation with Norfolk County Council as the Local Highway Authority. Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the AIL may overrun or oversail are identified in the **Outline CTMP [REP1-068]**, along with the likely and suitable access routes to the Scheme. Site access design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access as included in

ID	Comments/Issues Raised	Applicant's Response
		Appendix C of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]**. Mitigation measures are also set out in the **Outline CTMP [REP1-068]** to reduce, as far as practicable, the impacts of the Scheme on the local road network. In accordance with Requirement 15 of the **Draft DCO [REP1-014]** a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.
WR-TRA-002	Comments referred to the impact of construction traffic, including HGVs and AILs.	**ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174** to **APP-177]** presents an assessment of the Scheme on traffic and access, with the proposed construction routes and access points shown in the **Outline CTMP [REP1-068]**. Mitigation measures and management of traffic and access are set out in the **Outline CTMP [REP1-068]** and **Outline OTMP [APP-202]** to minimise impacts as far as practicable. Detailed CTMP and OTMP will be submitted to and approved by the relevant planning authority in accordance with the Requirements of the **Draft DCO [REP1-014]**. AIL movement will be carefully planned and timed to reduce disruption and undertaken in consultation with the relevant Highway Authority to ensure safe operation and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance. Requirements for AIL (for elements such as transformers and cable drums) will be determined through the detailed design

ID	Comments/Issues Raised	Applicant's Response
		process and in consultation with statutory consultees. As part of the management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AIL. It is likely that AIL deliveries will require temporary road closures or diversions on the day of the delivery and may require police escorts to maintain the safety of members of the public.
WR-TRA-003	Concerns were raised regarding construction traffic and the safety of residents.	Road safety has been considered in **ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]**. **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174-APP-177]** concludes the impact of the Scheme in relation to transport and access is not considered significant to the safe and efficient operation of the road network and PRoW network. Mitigation measures, including temporary traffic management, are set out in the **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203]** to reduce, as far as practicable, the impacts of the Scheme on the local road and PRoW network, as well as to protect the integrity of the public highway and the safety of road users. In accordance with Requirements 15 and 17 of the **Draft DCO [REP1-014]** a detailed CTMP and PRoWPPMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.
WR-TRA-004	Comments referred to the potential damage construction traffic could cause to roadside verges.	For visibility splay for vehicles and highway works associated with AIL movements, vegetation may be required to be trimmed and, in some cases, vegetation and/or street furniture removed when absolutely necessary to maintain the required sight lines for safety and to accommodate oversail.

ID	Comments/Issues Raised	Applicant's Response
		Street furniture removal will be temporary and will be reinstated, as set out in the **Outline CTMP [REP1-068]**. The **Outline CEMP [REP1-058]** sets out management measures in relation to tree pruning, including an Arboricultural Method Statement will be adopted and that the pruning works will be implemented by a suitably qualified arboricultural Contractor working in accordance with British Standard 3998: 2010 'Tree Work – Recommendations. AIL movement will be carefully planned and timed to reduce disruption and undertaken under licence with the Highway Authority to ensure safe operation and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance.
WR-TRA-005	Objections to the widening of roads and removal of street furniture.	The Applicant notes the concerns regarding road widening, the removal of street furniture, and potential works required to facilitate HGV and AIL movements. Firstly, the DCO powers facilitating such works include inherent controls. For example, Article 10 (Power to alter layout, etc., of streets) which includes the power to alter, remove, replace or relocate any street furniture, includes an obligation on the undertaker to restore any street that has been temporarily altered to the reasonable satisfaction of the street authority. Works will also need to be approved by the relevant planning authority in consultation with the highway authority as part of the final CTMP which must be substantially in accordance with the **Outline CTMP [REP1-068].**

ID	Comments/Issues Raised	Applicant's Response
		The proposed access arrangements and AIL routes have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]**, including vehicle tracking and swept-path analysis. Where localised highway works are required, these have been identified to facilitate the safe movement of vehicles and would be subject to detailed design and agreement with the relevant highway authority. There will be no removal of building frontage to accommodate HGV and AIL movements. The Applicant considers that any highway works required would be proportionate and appropriately managed, and that the assessment concludes, with the proposed mitigation measures in place, effects associated with HGV and AIL movements would not be significant.
TRA-006	Concerns were raised regarding emergency services access.	The **Outline CTMP [REP1-068]** includes measures to manage construction traffic and temporary traffic management in a manner that maintains highway safety and minimises disruption to road users. Where temporary traffic management is required, access arrangements will be developed in consultation with the relevant authorities, including maintaining access for emergency vehicles where necessary. **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** concludes that, with the proposed mitigation measures in place, effects on the operation of the Local Highway Network would not be significant.
WR-TRA-007	Comments noted that the transport assessment seems to be entirely desk-based.	The Applicant does not agree that the assessment is solely desk-based. The development of the access strategy included site visits and an on-the-ground review of the proposed access routes.

ID	Comments/Issues Raised	Applicant's Response
		The strategy was also developed in consultation with NCC who have also conducted their own site visits. The proposed access arrangements have also been assessed through access design, visibility assessments, vehicle tracking and swept path analysis as presented within **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174-APP-177]**. The Applicant does not agree that HGV volumes, AIL movements or road safety effects have been omitted. These matters are assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, supported by **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]**. The assessment also includes consideration of cumulative effects and road safety. Trip generation forecasts are based on a reasonable worst-case scenario, assuming all construction activities occur simultaneously. In practice, construction activities will be staggered across the programme. The **Outline CTMP [REP1-068]** also includes measures such as pre- and post-construction road condition surveys and traffic management measures to manage potential effects on the Local Highway Network. The Applicant therefore considers that a robust assessment of transport and access effects has been undertaken.
WR-TRA-008	Concerns were raised regarding the cumulative impact of Scheme traffic.	An assessment of cumulative developments has been provided in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** in accordance with industry-standard IEMA Guidance. This includes an assessment of A140, including traffic flows at three locations on the link.

ID	Comments/Issues Raised	Applicant's Response
		The cumulative development list with respect to traffic and transport has been prepared in consultation with Norfolk County Council as the Local Highway Authority. The cumulative schemes considered are set out in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-118]**, with the shortlist prepared in consultation with the relevant local planning authorities. This shortlist includes the 400MW (estimated 3,000MWh) BESS scheme at Land north of Carr Lane, Great Moulton (planning reference 2025/1689), located approximately 900m north of Sub-Site 1B and other large infrastructure schemes in the wider area. Mitigation measures for construction traffic, including cumulative effects and managing traffic movements on key links including A140, are secured in the **Outline CTMP [REP1-068]**. In accordance with Requirement 15 of the **Draft DCO [REP1-014],** a detailed CTMP will be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority, ensuring that construction vehicle movements are coordinated and impacts appropriately managed throughout the construction phase.
WR-TRA-009	Comments stated that proposed traffic controls were not suitable and will cause gridlock and congestion.	The traffic management measures set out within the **Outline CTMP [REP1-068]** have been developed in accordance with industry best practice and are specifically intended to minimise disruption to the Local Highway Network. These measures include delivery scheduling, vehicle booking systems, designated routes, managed vehicle movements and temporary traffic management where required. The Applicant considers that these measures provide a robust framework for managing construction traffic. A detailed CTMP,

ID	Comments/Issues Raised	Applicant's Response
		substantially in accordance with the **Outline CTMP [REP1-068]**, will be prepared and approved by the relevant planning authority in consultation with the relevant highway authority pursuant to the Requirements of the **Draft DCO [REP1-014]** prior to construction. **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** concludes that, with these measures in place, effects on network operation and driver delay would not be significant.
WR-TRA-010	Requests for detailed maps noting specific traffic movements. Comments noted that the Long Stratton Bypass was not included in the Scheme's maps.	The Applicant is aware of the opening of the Long Stratton Bypass, and this has informed the preparation of the access strategy. As shown in **ES Volume 2, Figure 11.1 - Indicative Transport and Access Study Area [APP-094]**, the bypass is included within the study area. This is additionally indicated within the routeing figures in **ES Volume 2 Figures 11.2 - 11.8 - Likely and Suitable Access Routes to the Scheme [APP-095]** (which also includes indicative AIL routeing), alongside acknowledgement within **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]** to **APP-177]** and **ES Volume 1 Chapter 11 - Transport and Access [APP-047]**. The Applicant updated the OS basemaps of the **Works Plan [ASS-002 / ASS-003]** at Deadline 1 Cumulative and in-combination effects are assessed in **ES Volume 1 Chapter 11 - Transport and Access [APP-047]**. Baseline traffic flows have also been growthed to the peak construction year using industry-standard TEMPro software which captures committed housing developments as part of its inherent background growth estimates. Any developments not captured already within TEMPRo are also detailed in Section 11.11 of **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**.

ID	Comments/Issues Raised	Applicant's Response
WR-TRA-011	Comments referred to the permanent access routes at Site 1.	Accesses A03 and A04 on Frith Way are proposed for both the construction and operational phases of the Scheme. Operational traffic associated with routine maintenance is anticipated to be no more than five visits per month undertaken by staff using a car, 4x4 or van. Occasional ad-hoc HGV visits may be required to replace components such as batteries and inverters. The Applicant notes that panel replacement activities may occur during the operational life of the Scheme. Such activities are anticipated to be no worse than the construction phase and would be managed through the **Outline OTMP [APP-202]**, which includes measures to manage operational traffic and minimise effects on the Local Highway Network.
WR-TRA-012	Concerns were raised regarding the impact of access to homes and businesses.	The transport and access effects of the Scheme including access to homes and businesses have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and are supported by the **Outline CTMP [REP1-068]** and **Outline PRoWPPMP [APP-203]**. The assessment concludes that, with the proposed management and mitigation measures in place, effects with regards to transport and access would not be significant. Where temporary traffic management measures are required during construction, these will be designed to minimise disruption and maintain access to properties and businesses wherever practicable.
WR-TRA-013	Comments stated that only main roads should be used by Scheme traffic.	The Applicant has sought to maximise the use of A and B roads and internal haul routes wherever practicable. However, due to the geographic nature of the Scheme and site-specific physical

ID	Comments/Issues Raised	Applicant's Response
		and environmental constraints, access via some sections of the Local Road Network is required. The access strategy has been developed in consultation with NCC as the Local Highway Authority and is supported by a range of management and mitigation measures set out within the **Outline CTMP [REP1-068]**.
WR-TRA-014	Objections to the AIL and construction routes through Saxlingham Nethergate.	In respect of Saxlingham Nethergate, The Street will not be used for general construction traffic. The only construction traffic expected in Saxlingham Nethergate will be for the movement of the AIL. This is supported by an AIL Report and site access design, vehicle tracking and swept-path analysis within Appendix C and D of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]**. For AIL movements within Norfolk (and Suffolk) there is an embargo against AIL movements during peak traffic times. These restricted times are Monday to Friday 07:00 to 09:00 and 16:00 to 18:00. It is anticipated that the AIL movements would take place during the weekend and during daylight hours to enhance visibility. Each AIL movement will be carefully planned and timed to reduce disruption and undertaken under licence with the Highway Authority to ensure safe operation and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The movements will be undertaken using strict traffic management, and notification of these types of movements will be communicated in advance. Requirements for AIL will be determined through the detailed design process and in consultation with statutory consultees, to

ID	Comments/Issues Raised	Applicant's Response
		be secured through a detailed CTMP by Requirement of the **Draft DCO [REP1-014]**. As part of the management of AIL, the selected hauler must notify the police, highway authorities and bridge owners when planning to transport AILs. It is likely that AIL deliveries will require police escorts and/or temporary road closures or diversions on the day of the delivery to maintain the safety of members of the public. Mitigation measures relating to construction traffic and AIL is set out in the **Outline CTMP [REP1-068]**. In accordance with Requirement 15 of the **Draft DCO [REP1-014]** a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.
WR-TRA-015	Objections to the use of Market Lane and Wash Lane for Scheme traffic.	During the design process, the Applicant, in consultation with the Highways Authority, has sought to internalise construction routes, where possible, to reduce movements on the local road network. The construction routes are set out in the **Outline CTMP [REP1-068]**. Construction traffic routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to physical constraints associated with Shotesham Beck and the presence of hedgerows, which limit the ability to provide a direct connection between the two site parcels. The area between Sub-Sites 8A and 8B is also identified as an Avoidance Area within the **Cable Route Construction Statement [REP1-080]**. Accordingly, trenchless crossing methods are proposed for this section of the cable route, avoiding the need for an open-cut crossing in this location, while a short section of the existing highway network (Market Lane) is required to facilitate HGV movements between the two site parcels.

ID	Comments/Issues Raised	Applicant's Response
		There are two access points on Wash Lane; A47, which is a crossing point for the temporary construction phase of the CRC; and A48, which has been retained for flexibility subject to detailed design. Construction vehicles are not proposed to utilise Wash Lane to access the Scheme, as shown in **ES Volume 2, Figures 11.2 - 11.8 - Likely and Suitable Access Routes to the Scheme [APP-095]**. Construction traffic and access management measures are set out in the **Outline CTMP [REP1-068]** by Requirement 15 of the **Draft DCO [REP1-014]**.
WR-TRA-016	Concerns were raised regarding the use of Lodge Road and Frith Way.	The Applicant notes the concerns regarding the use of Lodge Road and Frith Way during construction. The characteristics of Lodge Road and Frith Way were considered as part of the transport assessment and informed the development of the access strategy. The effects of construction traffic on road safety and non-motorised users have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, supported by the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]** and **Outline CTMP [REP1-068]**. The **Outline CTMP [REP1-068]** includes management and mitigation measures designed to support the safe movement of construction traffic and minimise effects on local communities and road users. In addition, pre- and post-construction road condition surveys will be undertaken on relevant local roads, with any defects reasonably attributable to construction traffic being rectified to the satisfaction of NCC as the Local Highway Authority.

ID	Comments/Issues Raised	Applicant's Response
		The assessment concludes that, with the proposed mitigation in place, effects on road safety and the Local Highway Network would not be significant.
WR-TRA-017	Concerns were raised regarding the impact to surrounding areas, such as Stoke Holy Cross and Poringland, as well as Norwich.	The Applicant notes that Soke Holy Cross will not be used for general construction traffic, however, will be utilised for AIL movements. The transport and access effects of the Scheme, including construction traffic routeing and AIL movements, have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, supported by **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]** and **Outline CTMP [REP1-068]**. The assessment includes the strategic route network and roads beyond the Order Limits where traffic associated with the Scheme is forecast to travel. This is also supported by an AIL Report and site access design, vehicle tracking and swept-path analysis within Appendix C and D of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]**. AIL movements would be managed by specialist haulage contractors and subject to detailed route planning and traffic management measures.
WR-TRA-018	Concerns were raised regarding the impact to the A140.	As detailed in Table 11.16 of **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, the percentage impact of ATC3 (A140 south of Hempnall Roundabout) associated with the peak daily construction phase of the Scheme is 1% for all vehicles, or 2% for HGVs. As detailed in Table 11.22, the percentage impact of ATC3 associated with peak daily construction, plus cumulative schemes, is 6% for all vehicles, or 25% for HGVs. These percentages do not exceed IEMA Guidance thresholds requiring

ID	Comments/Issues Raised	Applicant's Response
		additional assessment of the link. This is detailed further in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**.
WR-TRA-019	Concerns were raised regarding the use of the Krons.	The Applicant notes the concern regarding the suitability of The Krons for construction traffic. The use of this link forms part of an access strategy developed following consultation and feedback from NCC. The Applicant believes The Krons provides the best solution to access Sub-Sites 7A-F and the internal haul route with the introduction of an appropriate traffic management and construction vehicle management protocol. Additionally, the Applicant also acknowledges NCC's request to utilise CRC8 instead of The Krons and is actively engaging with both NCC's highways and ecology teams to consider the potential impacts of both options to reach agreement on a preferred solution. The status of these discussions will be presented in the updated Statement of Common Ground With NCC at Deadline 3.
WR-TRA-020	Concerns were raised regarding whether emergency services would be able to use the access routes to the BESS in the event of a fire.	The Applicant acknowledges the concerns raised regarding access to the BESS Site for emergency service vehicles. The suitability of the proposed access arrangements has been assessed through swept path analysis. Swept path analysis has been undertaken for the BESS access arrangements using an emergency fire appliance, demonstrating that emergency vehicles can access the BESS Site. Site access drawings and vehicle tracking assessments included within Appendix C of **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174 to APP-177]** also demonstrate that the proposed access can accommodate construction HGVs, which represent a larger design vehicle than a typical emergency response vehicle.

ID	Comments/Issues Raised	Applicant's Response
		Construction traffic would be managed in accordance with the **Outline CTMP [REP1-068]**, which includes measures designed to maintain access and manage vehicle movements on constrained sections of the local highway network. The Applicant therefore does not agree that the proposed access routes are inherently unsuitable for emergency service vehicles. Emergency vehicle access requirements have been considered as part of the access design process and demonstrated through the vehicle tracking assessments submitted with the application. The Applicant has submitted an **Outline BSMP [REP1-066]** using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). Section 4 covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. Requirement 6 in the Draft DCO requires a detailed BSMP to be approved by the relevant planning authority in consultation with Norfolk Fire and Rescue Service and the Environment Agency. The detailed BSMP must be substantially in accordance with the **Outline BSMP [REP1-066]**.
WR-TRA-021	Concerns were raised regarding the impact of construction traffic on local villages such as Brooke and Shotesham.	The Applicant acknowledges the concern regarding the potential effects of construction traffic on the villages of Brooke and Shotesham. Construction HGV traffic associated with the Scheme is not anticipated to route through Brooke village. The only Scheme traffic anticipated to use roads within Brooke relates to AILs, which would be infrequent in nature and managed in accordance

ID	Comments/Issues Raised	Applicant's Response
		with the AIL management measures set out in Section 6.4 of the **Outline CTMP [REP1-068]**. The Applicant also notes the reference to Shotesham. Construction traffic associated with the Scheme is not anticipated to route through Shotesham village. Accordingly, the Applicant does not anticipate direct effects on the village arising from construction traffic routing through it. The potential effects of construction traffic on local communities have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. Taking account of the proposed mitigation and management measures, the assessment concluded that effects on affected receptors would generally be low or negligible.
WR-TRA-022	Comments raised concerns about the Applicant's assessment of AILs, and requested detailed route plans, traffic restrictions, alternatives and measures for protecting access, heritage features and other road users.	The Applicant notes the concerns raised. The proposed AIL route has been developed with input from a specialist abnormal load transport consultant experienced in the movement of AILs, and AIL routes and access arrangements have been assessed as part of the transport assessment process, including vehicle tracking. Section 6 of the **Outline CTMP [REP1-068]** sets out the framework for the management of AIL movements, including the safety measures that would be implemented to facilitate these movements. Further detail regarding routing, temporary works and traffic management measures would be provided within the detailed Construction Traffic Management Plan, secured through the **Draft DCO [REP1-014]** requirements. The AIL report contained within ES Volume 3, Appendix 11.1 – Transport Assessment **[APP-174 to APP-177]** and the management measures contained within the **Outline CTMP**

ID	Comments/Issues Raised	Applicant's Response
		[REP1-068] provide the basis for the assessment of AIL movements. The Applicant considers that sufficient information has been provided to assess the effects of AIL movements at this stage of the consenting process, with further detail to be provided through the detailed Construction Traffic Management Plan secured through the **Draft DCO [REP1-014]** requirements.
WR-TRA-023	The Applicant was requested to provide corrected forecasts, clear routing and assessment of permanent crossings.	The Applicant notes the concerns raised. Traffic forecasts, construction traffic routeing and the assessment of traffic effects are reported in E**S Volume 1, Chapter 11 - Transport and Access [APP-047]** and the accompanying **ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174 to APP-177]**. The assessment concludes that the forecast traffic impacts associated with the Proposed Development would not result in significant effects. Construction traffic routeing, access arrangements and construction sequencing would be managed through the **Outline CTMP ([EP1-068)]** and developed further through the detailed Construction Traffic Management Plan, prepared in consultation with Norfolk County Council in its role as Local Highway Authority.
WR-TRA-027	Comments referred to an old brick culvert near Site 5 and the impact of this from construction traffic.	The Applicant notes the concerns raised. The suitability of the proposed accesses for the vehicles required during construction has been assess ed through vehicle tracking, as presented in Appendix C of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-177].** This assessment demonstrates that the proposed accesses can accommodate the anticipated vehicle types without requiring vehicles to overrun adjacent private property. Pre-condition surveys of the highway network would be undertaken where appropriate prior to construction commencing. Any damage to the public highway arising from construction

ID	Comments/Issues Raised	Applicant's Response
		activities would be identified and remedied by the Applicant, with appropriate measures also implemented to protect existing drainage infrastructure and statutory undertakers' apparatus where construction activities interface with these assets.
WR-TRA-028	Comments referred to the blind bends and constrained village routes such as Church Hill and The Krons.	The Applicant notes the concerns raised. The suitability of the proposed accesses has been assessed through vehicle tracking, as presented in Appendix C of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-177]**, which demonstrates that the anticipated construction vehicles can safely access the Site. Section 7.14 of the **Outline CTMP [REP1-068]** sets out the proposed highway condition survey process, including the undertaking of pre-construction condition surveys and subsequent monitoring of affected routes. The **Outline CTMP [REP1-068]** further commits that any defects identified as arising from construction activities would be rectified by the Applicant to the satisfaction of Norfolk County Council, in its role as Local Highway Authority.

3.18 Air Quality

Table 3.18 Air Quality

ID	Summary of Representation	Applicant's Response
WR-AIR-001	Concerns were raised regarding the impact on air quality and air pollution, including the increase in dust/dust particles during construction, operation and decommissioning.	**ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180]** presents the construction dust risk assessment and an assessment from traffic on air quality from construction and decommissioning is presented in **ES Volume 1, Chapter 13 – Air Quality [APP-049]**. No significant effects on air quality are identified in **ES Volume 1, Chapter 13 – Air Quality [APP-049]**. Mitigation and control measures for dust and vehicle emissions are provided in the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]**. In accordance with Requirements 13 and 14 of the **Draft DCO [REP1-014]**, detailed CEMP and OEMP will be submitted to and approved by the relevant planning authority.
WR-AIR-002	Concerns were raised about the potential for toxic gas (such as hydrogen fluoride) being released from BESS.	A BESS Fire Emissions to Air Risk Assessment (Plume Study) has been undertaken to understand the potential risk of air quality impacts of emissions released during a BESS fire on human receptors. This assessment considers the UK Health Security Agency (UKHSA)-recommended relevant air pollutants that may be harmful to human health, including hydrogen fluoride. This assessment is presented in Appendix B of the **Outline BSMP [REP1-066]** and has been used to inform emergency response mitigation measures presented in the **Outline BSMP [REP1-066]**. The Plume Study demonstrated that there was no significant risk of impacts on any sensitive residential receptor location with 1km of the BESS compound in the event of a BESS fire.

ID	Summary of Representation	Applicant's Response
		The Plume Study identified 3 PROWS (Tivetshall St Margaret Footpath 3 located 60m east, Great Moulton Restricted Bridleway 18 approximately 90m north-east, Great Moulton Restricted Bridleway 19 approximately 40m north of the BESS Unit locations based on the indicative BESS layout) that may need to be temporarily closed in the event of a BESS fire. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the "*proposed development should not result in any significant adverse impact on public health*."

3.19 Socio-Economics

Table 3.19 Socio-Economics

ID	Summary of Representation	Applicant's Response
WR-SOC-001	Comments referred to the impact on property values.	The Applicant's **Book of Reference [REP1-018]** includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any diminution in value due to physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
WR-SOC-002	Concerns were raised regarding the impact on local businesses.	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** incudes an assessment on the economy and local businesses. The assessment concludes that the Scheme will deliver socio-economic benefits including for local businesses during the construction phase as a result of supply chain opportunities such as sourcing some materials and components locally, creating partnerships between suppliers, manufacturers and distributors that that will stimulate economic activity within the local area. In total, the construction of the Scheme will support 1,044 net direct and indirect jobs and is estimated to generate £137m in GVA over the construction phase.

ID	Summary of Representation	Applicant's Response
		The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSC [REP1-070]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [REP1-014]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme.
WR-SOC-003	Concerns were raised regarding the impact to tourism.	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** incudes an assessment on local tourism assets. There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be addressed through an agreed compensation arrangement. However, there are a number of tourist attractions and tourist accommodation providers located near to the Order Limits that have the potential to be indirectly adversely affected by the Scheme. Indirect effects during the operation and maintenance phase can relate to visual and glint and glare effects. There is also the potential for glint and glare from the Scheme. Such indirect effects are considered in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and **ES, Volume 1 Chapter 18 – Other Environmental Matters [APP-054]**. Moreover, the assessment of impacts on temporary accommodation in **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** did not find significant adverse effects for any phase of the project (Table 14.28). This is based on an

ID	Summary of Representation	Applicant's Response
		assessment of local accommodation capacity (in hotels, B&Bs, and AirBnBs) and worst-case scenarios for the number of workers requiring accommodation. Even with half of the scheme's peak construction workforce needing accommodation, in the region of 374 rooms across South Norfolk would be available for the wider market (paragraph 14.8.35). The scheme is not, therefore, expected to adversely affect tourism via placing undue demands on temporary accommodation.
WR-SOC-004	Concerns were raised regarding the impact to residential amenities.	Potential effects on residential amenity have been assessed within the Human Health Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**, including consideration of noise, access, traffic, visual amenity and the overall quality of the local living environment. The assessment also takes account of the baseline health characteristics and vulnerabilities of the surrounding community. During construction, potential effects may arise from temporary activities such as construction traffic, plant operation, earthworks and the presence of temporary construction compounds. These activities have the potential to influence health and wellbeing through short-term changes to noise levels, air quality, traffic conditions, accessibility and visual amenity. However, taking account of the embedded mitigation measures, construction-phase effects on human health, and therefore residential amenity, were assessed as negligible or minor adverse and not significant. During operation, the Scheme will give rise to very low levels of activity, with limited vehicle movements and no ongoing combustion processes. Consequently, operational effects on air quality, noise, transport, water quality and ground conditions are assessed as negligible, with no identified pathways for adverse

ID	Summary of Representation	Applicant's Response
		physical health effects. Changes to landscape character and visual amenity represent the principal pathway through which operational effects on health and wellbeing and in turn residential amenities could occur, particularly in relation to mental wellbeing, sense of place and perceived environmental quality. However, embedded mitigation, including landscape design, planting and long-term management secured through the **Outline LEMP [APP-203]**, will limit the scale and duration of these effects. As such, operational effects on human health, and therefore residential amenity, are assessed as not significant.
WR-SOC-005	Comments referred to CCTV and other security apparatus.	Security requirements are considered proportionate. The parameters and commitments for CCTV are set out and secured through the **Design Principles, Parameters and Commitments [REP1-078]**. CCTV systems will be internal facing to ensure that surveillance is directed inwards the infrastructure within the Scheme, rather than outwards towards neighbouring properties or private activities. The precise final location, appearance and specification of CCTV equipment forms part of the detailed design, which will be submitted to and approved by the relevant planning authority through the Requirement in Schedule 2 of the **Draft DCO [REP1-014].**
WR-SOC-007	Objections to the potential number of jobs the Scheme could create.	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** incudes an assessment on the economy and local businesses, including jobs based on best practice. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSC [REP1-070]**. The detailed ESSCS

ID	Summary of Representation	Applicant's Response
		is secured through Requirement 19 of the **Draft DCO [REP1-014]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme. The Applicant's employment proposals align with the Norfolk NSIP Employment and Skills Framework, particularly its commitment to employment and employability support, by promoting local recruitment and targeted opportunities for disadvantaged groups.
WR-SOC-008	Comments referred to the disruption the Scheme could have on residents during construction.	Potential effects of the Scheme on local communities have been considered within the Human Health Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**. The assessment identifies that nearby residents may experience temporary construction-related effects, including increased noise levels, changes in traffic conditions and alterations to access arrangements, which could affect day-to-day activities undertaken at home. Operational effects, including changes to noise levels, have also been assessed. However, having regard to the nature, duration and scale of these effects, and with the implementation of mitigation measures secured through the **Outline CEMP [REP1-058]**, **Outline CTMP [REP1-068]**, **Outline OTMP [APP-202]** and **Outline PRoWPPMP [APP-203]**, effects on residents, including those working or studying from home, are assessed as not significant during both the construction and operational phases.

ID	Summary of Representation	Applicant's Response
		These findings are consistent with those presented in the **Equality Impact Assessment [APP-214]** and the Equality Impact Assessment recognises the importance of continued engagement and monitoring throughout the construction phase to help identify and manage any emerging community concerns. With specific regard to community liaison, this is directly secured through Requirement 4 of the **Draft DCO [REP1-014]** through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
WR-SOC-009	Comments noted that the Scheme should use UK-based manufacturers for Scheme components.	Whilst construction of a scheme of this nature does involve the use of imported materials, the Applicant will take measures to maximise benefits through the supply chain to local businesses. These measures are set out in the **Outline ESSCS [REP1-070]** and include informing small businesses about contract and purchasing opportunities available from the Scheme and early engagement with potential contractors.
WR-SOC-010	Requests for a full socio-economic impact assessment, including the effect on local businesses.	The Applicant considers that the scope of **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** is appropriate, with the ES more widely covering all areas necessary and was agreed with the Planning Inspectorate through the **ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]**. Socio-economic effects for each phase of the Scheme are assessed. These are summarised in Table 14.28. Significant effects identified are Major or Moderate Beneficial impacts on jobs in South Norfolk in the construction phase and decommissioning phase, and on

ID	Summary of Representation	Applicant's Response
		Skills and the Labour Market in all three phases. No significant adverse effects are identified, with the temporary accommodation market and the tourism industry assessed. Whilst impacts on town centre vitality are not specifically assessed, the beneficial employment impacts including through the supply chain and the spending of workers in the area (i.e. indirect/induced effects) will benefit local businesses. The **Outline ESSCS [REP1-070]** will be progressed to a detailed ESSCS, secured through Requirement 19 of the **Draft DCO [REP1-014]**.

3.20 Soils and Agricultural Land

Table 3.20 Soils and Agricultural Land

ID	Summary of Representation	Applicant's Response
WR-SOI-001	Comments referred to the use and potential loss of BMV agricultural land and food production. Comments referred to a preference for solar to be located on previously developed land and/or on industrial units, farm buildings, commercial buildings, warehouses, airports, carparks, railway lines and motorways.	NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV quality land and that land type should not be a predominating factor in determining the suitability of the site location. NPS EN-3 recognises that, at scale, developments may use some agricultural land. At Paragraph 2.10.21, NPS EN-3 states that '*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible* ' ALC was an important factor for the Applicant in site selection. Land within the Order Limits was identified as likely to be some of the lowest quality land relative to the wider area based on Natural England's 'Predictive Likelihood of BMV' mapping. Non-BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the **Site Selection Assessment [APP-215],** which considers potential for non-BMV alternative sites identified through desktop mapping to accommodate the Scheme. As set out in the **Statement of Need [APP-206]**, while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the

ID	Summary of Representation	Applicant's Response
		scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. During the design evolution of the Scheme, consideration was given to reducing the impact on BMV quality land, as far as practicable, as described in the **Design Approach Document [APP-212]**. **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. In accordance with the **Outline SRMP [APP-204]** that in includes measures to manage soils as a resource and minimise adverse impacts, a detailed SRMP will be submitted to and approved by the relevant planning authority, as secured by a Requirement 18 in the **Draft DCO [REP1-014]**. The land requirement and approach to maximising generation are explained in the Statement of Need and Site Selection Assessment. The Applicant considers large-scale ground-mounted solar necessary alongside rooftop solar, while the Outline Soil Resources and Management Plan provides for continued agricultural management, including grazing where practicable. The Applicant considers large-scale ground-mounted solar necessary alongside rooftop solar, the Outline SRMP [APP-204] provides for continued agricultural management, including grazing where practicable. The Outline SRMP will form the basis of the Detailed SRMP which is secured by requirement 18 of the Draft DCO **[REP1-014]**.

ID	Summary of Representation	Applicant's Response
WR-SOI-002	Concerns were raised that the Scheme could adversely affect UK food security and domestic food production. Requests for site-specific survey, including alternatives and assessment of long-term food production and resilience effects. Comments also noted that the Scheme would remove substantial areas of Grade 2 and other best and most versatile land from food production.	**ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** presents an assessment on food production and the rural economy. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely), particularly in the context that the amount of land within the Order Limits is approximately 0.22% of the land within Norfolk, and 1.2% of South Norfolk agricultural land. The UK Food Security Report concludes that food production levels could be maintained or moderately increased alongside the land use change required to meet net zero. The UK Solar Roadmap states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. At Paragraph 2.10.21, NPS EN-3 states that '*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible'.* Loss of BMV land is limited to 28.9ha. land not subject to permeant works will be returned to agricultural use upon decommissioning. The effect upon agricultural land is considered in ES Chapter 15, Section 15 [APP-051], yield and economic benefits can be illustrated using recognised agricultural budgeting books. ES

ID	Summary of Representation	Applicant's Response
		Chapter 15 has used Nix Farm Management Pocketbook 56th Edition (2025), since the time of writing the 57th edition has been published. Under the 56th edition of the Nix Farm Management Pocketbook the economic benefits are about £190,000 per annum which is negligible on a regional basis. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national basis. The area of agricultural land in Norfolk is about 417,633ha. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. To put this in context, currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) of Norfolk is not being cropped.
WR-SOI-003	Comments referred to the impact to soil health and land quality, including the impact to clay soil.	Soil, as a resource, is assessed within **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]**. Measures for the management and handling of soils, including the reinstatement of soils, are described in the **Outline SRMP [APP-204]**. With the exception of the National Grid Substation and Grid Connection Infrastructure, the soil and land conditions will be returned to its original use and condition as far as practicable. In accordance with Requirement 18 of the **Draft DCO [REP1-014]**, a detailed SRMP will be submitted to and approved by the relevant planning authority. The detailed SRMP will set out detailed tests to minimise and ameliorate the potential impacts on the soils including clay soils.

ID	Summary of Representation	Applicant's Response
WR-SOI-004	Comments referred to long-term restrictions on agricultural activities on the Cable Route Corridor. Requests were made for justification for enduring constraints and secured soil-handling, restoration and agricultural-access measures on the Cable Route Corridor.	The Applicant notes the concerns raised. It is anticipated that for the CRC, there will be limited impact from the works on agricultural land and soils due to the works to install the cabling will take place over narrow strips of land and will be of short duration. The works will be carried out in accordance with the detailed SRMP which will be submitted and approved by the relevant planning authority, as secured by Requirement 18 in the **Draft DCO [REP1-014]**. The permanent effects upon agricultural land both with and without including the relevant planting have been assessed in Section 15.10 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** as being significant. Temporary effects are of low magnitude and as such have not resulted in a significant effect.

3.21 Ground Conditions

Table 3.21 Ground Conditions

ID	Comments/Issues Raised	Applicant's Response
WR-GRO-001	Concerns were raised regarding the potential impact of contamination, including the contamination of local water supplies. Comments referred to ground contamination from toxic materials and leeching from solar PV panels and the BESS.	**ES Volume 1, Chapter 9 – Water Environment [APP-045]** provides an assessment of potential contamination from the Scheme on groundwater. The Applicant confirms all Solar PV Panels will be PFAS free (including within the manufacturing process), meaning there is no risk of the mobilisation of PFAS coatings on the panels. The panels will be cleaned with distilled water. Mitigation measures regarding the control and management from the risk of pollution from the Scheme is included in the **Outline OEMP [REP1-060]**. In accordance with Requirement 14 of the **Draft DCO [REP1-014]**, a detailed OEMP will be submitted to and approved by the relevant planning authority. Measures in relation to weed management are set out in the **Outline LEMP [REP1-064]**. The assessment within **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [REP1-052]** includes hydraulic model information and mapping provided by the EA. The EA confirmed during a meeting in December 2025 that further hydrological modelling was not required. The BESS will have a surface water drainage system that is lined with an impermeable membrane to prevent the ingress of potential contaminants to the strata beneath. The system will

ID	Comments/Issues Raised	Applicant's Response
		incorporate a penstock valve which will activate if the fire alarm sounds to isolate the surface water drainage system as secured within the **Outline BSMP [REP1-066]**. Similarly, the National and Project Substations will also have surface water drainage systems lined with an impermeable membrane as secured within the **Outline OEMP [REP1-060]**. The surface water drainage mitigation is secured through the **Design Principles, Parameters and Commitments [REP1-078]** and the detailed drainage design is secured through DCO Requirement 11.
WR-GRO-002	Comments referred to the risk to groundwater and groundwater contamination.	**ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** assesses effects associated with mobilisation of existing contamination in the ground, in accordance with the methodology agreed following scoping, informed by **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]**. As described in **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]** the risks presented by existing contamination in the ground, to groundwater (both in terms of biodiversity and as a resource) have been assessed as typically Very Low to Low. The Conceptual Site Model presented in ES Volume **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]** will be refined through Ground Investigation. The **Outline CEMP [REP1-058]** includes ground investigation as a mitigation measure, with the detailed design of the scheme to

ID	Comments/Issues Raised	Applicant's Response
		be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). If / where the GQRA identifies potential hazards within this area, then further work (including the use of fate and transport models) may be undertaken as part of a Detailed Quantitative Risk Assessment. As described in **ES Volume 1, Chapter 16 Ground Conditions [APP-052]**: "A*s discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent".* The **Outline CEMP [REP1-058]** requires that: • A Foundation Works Risk Assessment (FWRA) is prepared for the BESS, National Grid Substation and any other structures requiring deep foundations and/or piling such as the 132kV and 400kV Substations, informed by the post-consent ground investigation (secured by DCO Requirement 13). • Hydrogeological Risk Assessment is undertaken if required, where trenchless cable crossings interact with Principal or Secondary A Aquifers, or pass beneath surface watercourses or sensitive ecological receptors, secured within the **Outline CEMP [REP1-058]**. The surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an impermeable

ID	Comments/Issues Raised	Applicant's Response
		membrane to prevent the infiltration of runoff to the strata beneath. This is secured within the **Outline OEMP [REP1-060]**. Embedded mitigation measures for pollution management are set out and secured within the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**.
WR-GRO-003	Comments referred to locations of unexplored ordnance on Site.	**ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186 to APP-186]** includes a desk based unexploded ordnance assessment, together with mitigation measures. These measures will be provided in the detailed CEMP, as secured through the **Outline CEMP [REP1-058]** and Requirement 13 of the **Draft DCO [REP1-014]**. As reported in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]**, UXO may be present within the Order Limits. Mitigation measures to address UXO have been incorporated into the **Outline CEMP [REP1-058]** and comprise a detailed UXO desk study to confirm the UXO hazard level. Where a potential UXO hazard is identified by the detailed UXO desk study, the detailed study will include further recommended mitigation measures (e.g. non-intrusive surveys to further delineate potential UXO hazards, and investigation and removal of targets identified by the non-intrusive survey) for the intended types of development and anticipated working practices.
WR-GRO-004	Comments referred to the potential for sewage and asbestos to leak into groundwater.	The proposed elements of the Scheme do not contain asbestos. As described within **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]** the potential sources of asbestos contamination within the Order

ID	Comments/Issues Raised	Applicant's Response
		Limits include the former RAF Seething and RAF Hardwick airfields, Market Lane Pit and a former refuse tip in Sub-Site 4B. Asbestos is considered a risk to human health via the inhalation pathway and is not considered to be mobile or migratory in the water environment, with 'damping down' of asbestos used as a common method to prevent loose fibres becoming mobile. Where amenity facilities will be provided, foul wastewater will be collected and contained within sealed systems and tankered away from the site as secured in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**.
WR-GRO-005	Comments referred to the instability and subsidence risks associated with clay, former pits, piled structures and changing soil moistures. The Applicant was requests to product site-specific ground investigation and resilience assessment before foundation and drainage designs are finalised.	The Applicant notes the concerns raised. Ground conditions, land stability and shrink-swell risks are assessed in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** and **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to [APP-186]**. The detailed design of the Scheme (including the design of foundations) will be informed by ground investigation, with construction controls secured through the **Outline CEMP [REP1-058]**. The Applicant's position is that ground conditions risks are addressed through the ES, with further investigation and detailed design undertaken at the appropriate stage and environmental controls secured through the relevant management plans.

3.22 Noise and Vibration

Table 3.22 Noise and Vibration

ID	Summary of Representation	Applicant's Response
WR-NOI-001	Comments referred to noise and vibration during construction.	The assessment of construction noise and vibration is presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. Mitigation measures to control noise and vibration are described **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]** to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** Contractors would be required to ensure that works are carried out in accordance with best practicable means as stipulated in the Control of Pollution Act. In accordance with Requirement 13 of the **Draft DCO [REP1-014]** a detailed CEMP will be submitted to and approved with the relevant planning authority. If required, and as set out in section 2.5 of the **Outline CEMP [REP1-058],** the Applicant will seek prior consent for noisy works outside of core working hours under Section 61 of Control of Pollution Act. A Section 61 submission will describe the construction methods, predicted noise levels, proposed working hours, monitoring strategy, communication protocols with the relevant planning authority and the mitigation techniques to be employed. The purpose of the submission is to demonstrate that noise and vibration have been controlled as far as reasonably practicable.

ID	Summary of Representation	Applicant's Response
WR-NOI-002	Comments referred to noise and vibration during operation.	The assessment of operational noise and vibration is presented in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, which includes noise and vibration from tracker motors. The assessment concludes that the rating level from tracker motors are expected to be considerably below the background sound level, indicating a negligible impact, resulting in long term negligible adverse effects which are not significant. Mitigation measures to control noise and vibration during operation are described **Outline OEMP [REP1-060]**. Noise emitting plant will be selected with consideration of noise emissions where practicable. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. In accordance with Requirement 14 of the **Draft DCO [REP1-014]** a detailed OEMP will be submitted to and approved with the relevant planning authority.
WR-NOI-003	Comments referred to noise and vibration from the Project Substations, and National Grid Substations.	The Applicant notes the concerns raised regarding substations, transformers and inverters. Noise from these elements of the Scheme have been considered within **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The **Outline OEMP [REP1-060]** secures the commitment that the rating level from operational elements other than the BESS will not exceed the background sound level at residential receptors, and that sound levels from the BESS will not exceed those outlined in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The detailed design will

ID	Summary of Representation	Applicant's Response
		therefore be required to achieve the assessed and secured noise limits.
WR-NOI-004	Comments referred to noise and vibration from the BESS.	The Applicant notes the concerns raised regarding the BESS. BESS noise has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The **Outline OEMP [REP1-060]** includes a specific commitment that noise from the BESS will achieve the predicted sound levels set out in the ES. The final BESS design and equipment selection will therefore need to be consistent with those assessed levels and secured commitments.
WR-NOI-005	Concerns were raised regarding noise and vibration impacts to wildlife.	Minimum offset distances from key ecological features are secured through the **Design Principles, Parameters and Commitments [REP1-078].** Habitat corridors are reinforced and expanded through the protection and management of woodland, hedgerows and hedgerow trees, scrub and hedgerow planting as detailed in the **Green Infrastructure Strategy [REP1-013]** and **Outline LEMP [REP1-064]**, thereby avoiding significant noise impacts. Mitigation measures to control noise and vibration during operation are described **Outline OEMP [REP1-060]**; this includes in relation to the solar invertors, National Grid Substation, BESS, Integrated Conversion Units/33kV Sub-Distribution Switch Rooms and Project Substations. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Plant within the National Grid Substation will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable.

ID	Summary of Representation	Applicant's Response
		In accordance with Requirement 14 of the **Draft DCO [REP1-014]** a detailed OEMP will be submitted to and approved with the relevant planning authority.
WR-NOI-006	Concerns were raised regarding noise and vibration caused by construction traffic.	Construction vibration has been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, including consideration of construction activities and traffic where relevant. Construction works will be managed through the **Outline CEMP [REP1-058]** and **Outline CTMP [REP1-068]**, with detailed controls secured prior to construction. These measures will manage construction activity and associated vehicle movements to avoid unacceptable vibration effects.
WR-NOI-007	Concerns were raised regarding the impact to sleep.	The Applicant notes the concerns raised regarding health and sleep. Noise effects relevant to health and wellbeing have been assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**, including consideration of the Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) framework where applicable. Operational controls are secured through the **Outline OEMP [REP1-060]** and construction controls through the **Outline CEMP [REP1-058]**. The Applicant considers that appropriate mitigation is secured to avoid significant adverse noise effects on health, wellbeing and sleep.
WR-NOI-008	Concerns were raised regarding construction noise and vibration effects on nearby homes, businesses and heritage assets. Requests were raised for receptor-specific predictions, working-hour limits, monitoring	The Applicant notes the concerns raised. Construction noise and vibration are assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. Working methods, hours, monitoring, mitigation and complaints procedures would be controlled through the **Outline CEMP [REP1-058]**, with receptor-specific controls where required. The Applicant's position is that the noise and vibration assessment and the **Outline CEMP [REP1-058]** provide

ID	Summary of Representation	Applicant's Response
	and clear complaint and mitigation procedures.	the framework for construction controls, with the detailed CEMP to specify the measures applicable to the relevant phase and receptors.
WR-NOI-009	Comments referred to the operational noise impact from Project Substations and transformers. Requests were made to provide clearer noise limits, receptor-specific modelling and securing monitoring and mitigation throughout operation.	The Applicant notes the concerns raised. Operational noise from substations, transformers, BESS and other plant is assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** using the Scheme parameters in the Development Parameters and Principles document. Detailed equipment selection must remain within the assessed limits and incorporate mitigation where required. The Applicant's position is that operational plant noise has been assessed within the permitted design parameters and that detailed equipment selection and any required mitigation must remain within the assessed envelope. Operational noise is controlled through **Outline OEMP [REP1-060]**, including separate requirements for the BESS and other electrical infrastructure.
WR-NOI-010	Concerns were raised regarding repeated tracker movement and maintenance noise near homes, and recreational routes, including near Parcel 2A. Comments asked for equipment-specific evidence, cumulative operating assumptions and effective setbacks or acoustic mitigation.	The Applicant notes the concerns raised. Tracker and panel-movement noise, including Land Parcel 2A, is included in the operational assessment in **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]**. Detailed equipment selection must remain within the envelope assessed within the **Design Principles, Parameters and Commitments [REP1-078]** document and include mitigation where required. The Applicant's position is that tracker and panel equipment is included within the operational noise assessment and that final equipment selection must remain within the assessed design envelope. Operational noise is controlled through **Outline OEMP [REP1-060]**, including separate requirements for the BESS and other electrical infrastructure.

3.23 Electromagnetic Fields

Table 3.23 Electromagnetic Fields

ID	Summary of Representation	Applicant's Response
WR-EMF-001	Comments referred to the impact of EMF. Some comments referred to the impact of EMF from the National Grid Substation, project substations and grid infrastructure.	An assessment of Electromagnetic Fields (EMF) pertaining to human health is provided in **ES Volume 1, Chapter 17 – Electromagnetic Fields [APP-053]** and **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**. While the evidence indicates that no significant adverse human health effects are expected, mitigation measures for EMF are set out in the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]**. Electric fields are contained within the cable's protective insulation and sheath; therefore, no external electric fields are expected to occur due to the underground cables. The maximum levels of electromagnetic radiation during construction, operation and decommissioning phases will be below International Commission on the Non-Ionizing Radiation Protection reference levels.
WR-EMF-002	Comments referred to compliance with exposure guidance and assessment of nearby homes, gardens and children.	The Applicant notes the concerns raised. The **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** uses measured data and maximum field strengths for cables and electrical infrastructure and compares the expected field strength at locations of human health receptors. To summarise the assessment, electromagnetic fields associated with the proposed infrastructure is shown to diminish within a short distance, and therefore the expected levels at human health

ID	Summary of Representation	Applicant's Response
		receptors are not significant. The Applicant considers the predicted field strengths compliant with applicable exposure guidance and safe for human exposure, with detailed design required to remain within the assessed parameters in the **Design Principles, Parameters and Commitments [REP1-078]**. The Applicant's position in the SoCG is that electromagnetic fields have been assessed against the applicable exposure framework and that detailed design must remain within the assessed parameters.

3.24 Major Accidents and Disasters

Table 3.24 Major Accidents and Disasters

ID	Summary of Representation	Applicant's Response
WR-MAD-001	Concerns were raised about the risk of fire, damage, toxic gases or explosion from Scheme infrastructure.	The **Outline BSMP [REP1-066]** outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The **Outline BSMP [REP1-066]** identifies how the Applicant will use good industry practice to reduce risk to life, property and the environment from the BESS. By way of a Requirement 6 of the **Draft DCO [REP1-014]** prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the Environment Agency. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.
WR-MAD-002	Comments referred to the Scheme becoming a target for terrorism or national security threats.	While such risks are not specific to this Scheme and apply broadly across national infrastructure, the Applicant continues to engage with relevant authorities to ensure the Scheme aligns with applicable guidance and regulations. Security requirements have, however, been embedded into the design of the Scheme from the outset and are considered proportionate. The **Design Principles, Parameters and Commitments [REP1-078]** set out the parameters and commitments for the design of the Scheme,

ID	Summary of Representation	Applicant's Response
		including security measures, such as fencing, cameras and motion lighting. In accordance with national policy, the delivery of the Scheme would improve the resilience of the UK electricity system against the general threat of war or terror (i.e. in the event another electricity generation project was to be targeted, the Scheme would then ensure continued electricity supply).
WR-MAD-003	Comments referred to safety risks and threats to the Norwich to London main rail line.	The Scheme has been designed to avoid or minimise risks to existing infrastructure, including the railway network. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors within the **Outline BSMP [REP1-066].** The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for rail.
WR-MAD-004	Concerns were raised regarding safety concerns from extreme weather events, including lightning damage to substations and overhead-line infrastructure. Comments referred to how the Applicant will protect nearby properties, and implement inclusion zones and emergency procedures.	The Applicant notes the concerns raised. Whilst Major Accidents and Disasters were scoped out of the ES through the EIA Scoping process, **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** provides an assessment of the likely effects on Major Accidents and Disasters which are relevant to the Scheme, further demonstrating that Major Accidents and Disasters have been sufficiently addressed, with measures secured and pose no likely adverse significant effects. The design of the Scheme has been undertaken in accordance with relevant guidance and equipment will be selected to meet required safety standards. As set out in the **Outline OEMP** [**REP1-060**], all works will be undertaken in accordance with relevant Health and Safety legislation and guidance. Details of fire, police, emergency services, and hospitals will be publicised and included in the site induction. An Emergency Response Plan would be followed in the event of fire.

3.25 Telecommunications, Utilities and Television

Table 3.25 Telecommunications, Utilities and Television

ID	Summary of Representation	Applicant's Response
WR-TEL-001	Comments referred to the potential impact and disruption to local broadband networks, water networks and other utility crossings.	The **Draft DCO [REP1-014]** includes protective provisions for the protection of operators of electronic communication networks. Where applicable, these protective provisions will protect the interests, assets, and statutory functions of local broadband networks whose infrastructure may be affected by the Scheme.
WR-TEL-002	Comments referred to the potential impact to underground utilities.	An assessment of utilities is presented in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054],** concluding that: '*Telecommunications, television reception and utilities will experience no adverse likely significant effects during construction, operation and maintenance and decommissioning...*'. The **Draft DCO [REP1-014]** includes for protective provisions in Schedule 14 to safeguard utilities assets and associated operations. An assessment of potential ground stability hazards is presented within the **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]**. It is not considered that the construction of the Scheme would influence the likelihood of naturally occurring land stability hazards (e.g., collapsible ground stability, compressible ground stability, shrink-swell stability, dissolution, landslides or running sands being realised within land outside of the Order Limits. The **Outline CTMP [REP1-068]** includes a range of measures to manage construction traffic and minimise effects on the Local Road Network. This includes pre- and post-construction road condition

ID	Summary of Representation	Applicant's Response
		surveys that will be undertaken, with scope agreed with NCC as the Local Highway Authority. Any defects reasonably attributable to construction traffic associated with the Scheme would be rectified to the satisfaction of the Local Highway Authority.

3.26 Glint and Glare

Table 3.26 Glint and Glare

ID	Summary of Representation	Applicant's Response
WR-GLI-001	Concerns were raised regarding glint and glare from solar PV panels impacting properties, drivers, walkers, air traffic, railways and wildlife.	A glint and glare assessment is presented in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** and **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025** to **AS-029]**. This considers drivers on roads and railway, residential properties, and users of aerodromes. As part of the Statutory Consultation material, agreement on sensitive receptors and associated Study Areas was sought with relevant consultation bodies through the presentation of the PEIR for comment. Impacts of glint are considered where appropriate within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Measures to control lighting from the Scheme are described in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** with measures secured in the **Outline CEMP [REP1-058]** and **Outline OEMP [REP1-060]**. Further, mitigation for glint and glare in the form of instant hedgerow is proposed, as described in the **Outline LEMP [REP1-064]**. The Applicant considers that solar reflections towards all aerodromes could be operationally accommodated. If required, panels can be further mitigated by changing the backtracking angle to tilt solar reflections away from receptors. Further mitigation can be implemented by changing the configuration of panels, such as the azimuth, tilt (for fixed panels) and backtracking angle (for single-axis tracking panels). This is secured through the O**utline OEMP [REP1-060]**.

ID	Summary of Representation	Applicant's Response
WR-GLI-002	Requests for site-specific glint and glare assessment.	A glint and glare assessment is presented in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** and **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 to AS-029]**. This considers potential impacts from all sites pertaining to the Scheme upon drivers on roads, residential properties and users of aerodromes. The Applicant had assessed glint and glare impacts in **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025** to **AS-029]**, including at preliminary design stages to identify where mitigation would be required. As a result, the Scheme has embedded mitigation as part of its design. Table 7 of Appendix 18.1 outlines the existing and proposed screening identified predicted to mitigate impacts for dwellings/residents. The **Green Infrastructure Strategy [REP1-013]** provides detail on the proposed landscape and ecological measures, including visual screening.
WR-GLI-003	Comments referred to the tracking panels near Hawes Green, Shotesham St Mary and whether a worse-case assessment has been produced on glint and glare impacts.	The Applicant notes the concerns raised. Effects from both fixed and tracking panel configurations are assessed in the **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025** to **AS-029]** for the relevant receptors. Detailed design must remain within the envelope secured through the Development Parameters and Principles document and implement any mitigation relied upon in that assessment. The Applicant notes that the assessed mitigation forms part of the wider Scheme design and must be delivered alongside the landscape and ecological mitigation measures secured through the application documents.

3.27 Human Health and Equalities

Table 3.27 Human Health and Equalities

ID	Summary of Representation	Applicant's Response
WR-HUM-001	Concerns were raised regarding the impact of the Scheme on mental and physical health. Some comments referred to how the Scheme will impact quality of life for residents. Comments stated that there has been increased stress and anxiety because of the Scheme.	Human health has been assessed in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** which considers human health in relation to transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects. Mental health has also been considered, as presented in the **Equality Impact Assessment [APP-214]**. The **Outline CEMP [REP1-058], Outline CTMP [REP1-068], Outline OEMP [REP1-060], Outline OTMP [APP-202], Outline LEMP [REP1-064], Outline PRoWPPMP [APP-203]** and **Outline ESSC [REP1-070]** outline measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** The **Mental Health and Wellbeing Addendum [REP1-107]** prepared by the Applicant, provides further consideration of the evidence and representations submitted during the Examination in relation to potential mental health and wellbeing effects. Having reviewed this additional information, the Addendum does not alter the overall conclusions of the Human Health Summary Statement within Chapter 18 or the Equality Impact Assessment. This conclusion does not seek to discount the concern or distress reported by individual resident.

ID	Summary of Representation	Applicant's Response
		With specific regard to community liaison, this is directly secured through Requirement 4 of the **Draft DCO [REP1-014]** through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
WR-HUM-002	Comments referred to the potential impact the Scheme could have on neurodivergent people.	The **Equality Impact Assessment [APP-214]** recognises that construction noise and vibration may be experienced differently by some individuals, including those who are more sensitive to sensory stimuli. The **Outline CEMP [REP1-058], Outline OEMP [REP1-060] and Outline DEMP [REP1-062]** outline measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014]**. Following implementation of these mitigation measures, **Equality Impact Assessment [APP-214]** concludes that the impact would be neutral overall. The Mental Health and Wellbeing **[REP1-107]** prepared by the Applicant, provides further consideration of the evidence and representations submitted during the Examination in relation to potential mental health and wellbeing effects. Having reviewed this additional information, the Addendum does not alter the overall conclusions of the Human Health This conclusion does not seek to discount the concern or distress reported by individual resident The Applicant recognises the seriousness of the experiences reported. These accounts have been treated as relevant qualitative

ID	Summary of Representation	Applicant's Response
		evidence in the **Mental Health and Wellbeing Addendum [REP1-107]** (see the Applicant's response to ISH1 Action Point 44), alongside the environmental assessment, consultation evidence and available population-health information. The Addendum consolidates and provides further detail on the assessment of pathways including uncertainty, perceived environmental change, place attachment, access to nature, social participation and cumulative wellbeing effects. It is intended to supplement, rather than replace, the assessments submitted with the Application. Its findings have been reported and, where necessary, additional mitigation or monitoring commitments have been identified for consideration through the Examination. The Applicant acknowledges the concerns raised regarding stress, anxiety and the potential effects of the Scheme on community wellbeing. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that large infrastructure projects can affect wellbeing through pathways such as perceived environmental change, disruption, uncertainty and concern about potential risks. It also recognises that older people and those with existing health conditions may be more sensitive to environmental change and temporary disturbance. In response to consultation feedback on these matters, an assessment of mental wellbeing and equality-related impacts was undertaken and is presented within the **Equality Impact Assessment [APP-214]**. On the basis of the Human Health Summary Statement and **Equality Impact Assessment [APP-214]** currently available, the Applicant has not identified a likely significant population-level health effect. The **Mental Health and Wellbeing Addendum [REP1-107]** further

ID	Summary of Representation	Applicant's Response
		tests and documents that conclusion in light of the evidence submitted during the Examination With specific regard to community liaison, this is directly secured through Requirement 4 of the **Draft DCO [REP1-014]** through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
WR-HUM-003	Concerns were raised about the unknown health impacts the Scheme could produce, particularly on children.	Potential health effects have been assessed within the Human Health Statement in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**. The assessment considers pathways particularly relevant to human health, including air quality, access to outdoor routes and recreational spaces, visual changes, disturbance and impacts on wellbeing. The Human Health Statement concludes that, with embedded mitigation and additional noise mitigation measures in place, the Scheme is not expected to result in likely significant adverse residual effects on human health. While some residual landscape and visual effects remain in limited locations, these are not anticipated to result in significant long-term effects on health or wellbeing, including for children and young people. The protected characteristics are considered in the **Equality Impact Assessment [APP-214]**.
WR-HUM-004	Comments referred to medical conditions becoming worse, particularly from air pollution.	An assessment of the air quality effects of road traffic emissions associated with the Scheme is provided in **ES Volume 1, Chapter 13 – Air Quality [APP-049].** The assessment concludes that the

ID	Summary of Representation	Applicant's Response
		Scheme would not result in any significant adverse air quality effects. Dust emissions during construction, operation and decommissioning are assessed in **ES Volume 3, Appendix 13.1- Construction and Decommissioning Dust Risk Assessment [APP-180]**. The dust risk assessment presented in **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment** determines appropriate mitigation measures for inclusion in the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. The outline management plans outline the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].**

3.28 Aviation

Table 3.28 Aviation

ID	Summary of Representation	Applicant's Response
WR-AVI-001	Concerns were raised regarding the impact to Tibenham Airfield.	The Applicant has engaged with Tibenham Airfield to inform the assessments of the Scheme upon aviation. Engagement with Norfolk Gliding Club is listed in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**. The Applicant has assessed the glint and glare impacts in **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 to AS-029]** and other aviation concerns including Engine Failure After Take-Off (EFATO), Glider Launch Failure (GLF), turbulence, wind shear and electromagnetic interference in the **High Level Investigative Report [APP-222]**. The Scheme, in the context of the specific circuits and approaches operated by Norfolk Gliding Club, was not judged to significantly cause a significant scenario, due to reflecting panels being behind a pilot travelling in the direction of a circuit, or views of reflecting panels coinciding with the sun. The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best practice and no significant effect on thermal updrafts, turbulence or wind shear was predicted.

ID	Summary of Representation	Applicant's Response
		Notwithstanding, the Applicant continues to engage with Norfolk Gliding Club (NGC), who operate from Tibenham Airfield, regarding the impact upon their safeguarding concerns. Further comments and issues were discussed at a meeting with Norfolk Gliding Club on 14/10/26. There is continued dialogue with NGC and the parties are working towards a Statement of Common Ground the first draft of which was submitted at **Deadline 1 [REP1-096]**. An updated Statement of Common Ground reflecting the progress of the discussions will be submitted at Deadline 3.
WR-AVI-002	Concerns were raised regarding the impact to Seething Airfield.	The Applicant has engaged with Seething Airfield to inform the glint and glare assessments of the Scheme upon aviation activity in **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 to AS-029]**. The Scheme is not predicted to significantly impact operations associated with Seething Airfield, as presented in **Potential Impact on Seething Aerodrome Forced Landing Options [APP-223]**.

3.29 Battery Safety

Table 3.29 Battery Safety

ID	Summary of Representation	Applicant's Response
WR-BAT-001	Concerns were raised regarding the safety of the BESS and the impact this could have to nearby properties, recreational routes, businesses and schools. Comments referred to fire risk, toxic gases and thermal runway, as well as the use of lithium batteries.	The **Outline BSMP [REP1-066]** outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The **Outline BSMP [REP1-066]** identifies how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the **Outline BSMP [REP1-066]**. Section 1.4.2 of the **Outline BSMP [REP1-066]** stipulates: "*Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);* • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and*

ID	Summary of Representation	Applicant's Response
		• *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite*." A BESS Fire Emissions to Air Risk Assessment (Plume Study) has been undertaken to understand the potential air quality impacts of emissions released during a BESS fire on human receptors. This assessment is presented in Appendix B of the **Outline BSMP [REP1-066]** and has been used to inform emergency response mitigation measures presented in the Outline BSMP **REP1-066.** The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound in the event of a BESS fire. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail. The **Outline BSMP [REP1-066]** includes mitigation measures, including the preparation of an Emergency Response Plan (ERP) at detailed design stage that will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. The ERP could also contain measures such as notification of potentially affected residents and temporary closure of PRoW. A detailed BSMP must be approved after consultation with Norfolk Fire and Rescue Service and the Environment Agency; emergency access informed the design. The Applicant confirms that the Environment Agency is a named consultee for the Battery Safety Management Plan requirement and that the detailed plan is subject to the secured consultation and approval process in the Draft DCO. By way of a Requirement 6 of the **Draft DCO [REP1-014]** prior to the commencement of construction of the BESS, the

ID	Summary of Representation	Applicant's Response
		Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the EA. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.
WR-BAT-002	Comments referred to BESS mitigation in the event of a BESS fire, explosion or toxic plume. Some comments included requests for an evacuation zone, detailed evacuation plans and a safe buffer around the BESS.	A BESS Fire Emissions to Air Risk Assessment (plume modelling) has been undertaken to understand the potential air quality impacts of emissions released during a BESS fire. This assessment is presented in Appendix B of the **Outline BSMP [REP1-066]** and has been used to inform mitigation measures presented in the **Outline BSMP [REP1-066]**. The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound in the event of a BESS fire. Effects beyond this distance would be even lower, and therefore the Applicant confirms there will be no requirement for a 6km radius evacuation zone. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail. As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site

ID	Summary of Representation	Applicant's Response
		operations and emergency response safety audit. This is stipulated in the **Outline BSMP [REP1-066]** and will ensure that there is clear evidence that the impacts of credible BESS fire scenarios are safely contained within the BESS site, and there is no fire risk to any residential receptor's property. By way of a Requirement 6 of the **Draft DCO [REP1-014]** prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the EA. This means that NFRS and the EA must approve the BSMP before it can be submitted to the local planning authority. The Applicant's **Outline BSMP [REP1-066]** stipulates specific risk assessments or test data analysis that must be conducted and signed off by an independent fire protection engineer. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.
WR-BAT-003	Concerns were raised regarding the availability of water supply for the fire service in the event of a BESS fire.	The **Outline BSMP [REP1-066]** includes an illustrative BESS layout, including the potential location for water storage tanks. The BESS area will be designed for firefighting to integrate into pressure fed (pump driven) fire hydrants fed from water tanks. Hydrant locations and the volume of water storage will be established in consultation with Norfolk Fire and Rescue Service, as described in the **Outline BSMP [REP1-066]**. The firefighting water requirement will be fully assessed at the detailed design stage based upon based upon analysis of Large-

ID	Summary of Representation	Applicant's Response
		Scale Fire Testing of the BESS design, plus any additional fire and explosion test data provided by an independent Fire Protection Engineer. Section 5.1.8 of the Applicant's **Outline BSMP [REP1-066]** stipulates that**:** "*ERPs covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.*" The **Outline BSMP [REP1-066]** documents the Applicant's consultation with Norfolk Fire and Rescue Service. Engagement with NFRS will continue across the project lifecycle; this is secured through the DCO and NFRS is a statutory consultee for the Scheme. The **Outline BSMP [REP1-066]** includes mitigation measures, including the preparation of an Emergency Response Plan (ERP) at detailed design stage that will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. By way of a Requirement 6 of the **Draft DCO [REP1-014]** prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with the with Norfolk Fire and Rescue Service and the EA. This means that NFRS and the EA must approve the BSMP before it can be submitted to the relevant

ID	Summary of Representation	Applicant's Response
		planning authority. The Applicant's **Outline BSMP [REP1-066]** stipulates specific risk assessments or test data analysis that must be conducted and signed off by an independent fire protection engineer. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.

3.30 Cumulative and In-Combination Effects

Table 3.30 Cumulative and In-Combination Effects

ID	Summary of Representation	Applicant's Response
WR-COMB-001	Comments referred to the cumulative impact of the Scheme with other solar and BESS projects in Norfolk, including Norwich to Tilbury and Tasway Energy Park.	The Applicant is aware of other projects in the region. The **ES [APP-036** to **APP-195]** presents an assessment of the cumulative effects of multiple existing and/or approved developments on the receptors presented in the ES. This includes **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** that presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. The **Statement of Need [APP-206]** explains that the Scheme's proposed location is appropriate for large-scale solar because of the existence of available and suitable land, suitable levels of solar irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. The Clean Power 2030 Action Plan paves the way for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero.

ID	Summary of Representation	Applicant's Response
		The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination. The **ES [APP-036** to **APP-195]** has been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]**.
WR-COMB-002	Comments referred to the cumulative impact of the Project Substations and National Grid Substation in Site 1.	The Applicant has assessed the likely significant effects of the Scheme, including the Project Substations and National Grid Substation, in the **ES [APP-036 to APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans, which will ensure that the impacts are kept to a minimum, are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].**
WR-COMB-002	Comments were raised regarding the in-combination effects of the Scheme, including the combined visual impacts with Scheme traffic, noise, and disruption to recreational routes.	The Applicant notes the concerns raised. The ES includes a cumulative and in-combination assessment of qualifying schemes within topic chapters and **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]**, which the Applicant considers captures overlapping local effects on residents and PRoW users. The Applicant's SoCG position is that cumulative schemes have been identified and assessed in accordance with

ID	Summary of Representation	Applicant's Response
		the EIA Regulations and Planning Inspectorate advice, with cumulative effects considered within the relevant topic assessments. The Environmental Statement also assesses effects on individual receptor groups, including nearby residents and users of PRoW, taking account of the interaction of effects where relevant to the conclusions reached. In addition, the framework for managing environmental effects during the operational phase of the Scheme is set out in the **Outline OEMP [REP1-060]**, the **Outline OTMP [APP-202]**, the **Outline LEMP [REP1-064]** and **the Outline PRoWPPMP [APP-203]**.
WR-COMB-003	Comments referred to how multiple effects have been assessed in terms of impacts to local people who both work and live close to the construction areas.	The Applicant notes the concerns raised. Cumulative and in-combination effects are assessed by receptor in the relevant ES topic chapters and brought together in **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]**. Traffic, noise, landscape, PRoW and construction mitigation is secured through the relevant outline management plans and DCO requirements. The Applicant's position is that cumulative and in-combination effects have been assessed in accordance with the EIA Regulations and Planning Inspectorate advice, including topic-specific consideration of relevant receptors and mitigation. The assessment therefore considers effects on identified receptors, including those who may experience more than one type of effect during construction and operation, where relevant to the assessment conclusions.

3.31 Community Benefits

Table 3.31 Community Benefits

ID	Summary of Relevant Representation	Applicant's Response
WR-BEN-001	Comments referred to the Scheme has having no meaningful benefits for local people. Concerns were raised regarding the proposed community benefit scheme.	Efforts to provide specific benefits in locally impacted communities are set out in the **Outline ESSCS [REP1-070]** for employment and economy and in the **Outline LEMP [REP1-064]** in relation to landscape and through the provision of community benefits such as new permissive access routes and community accessible spaces. Mitigation measures set out within the **ES [APP-036** to **APP-195]** are designed to reduce and minimise significant effects where possible. The electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements. The need and benefits of the Scheme are set out in the **Planning Statement [REP1-074]** and in the **Statement of Need [APP-206]**. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).

ID	Summary of Relevant Representation	Applicant's Response
		There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme, however, the Applicant notes that guidance published in May 2025 by the Department for Energy Security and Net Zero (DESNZ) 'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which provides expected and minimum thresholds and revisions community-led governance through local Fund Administrators and includes benefits such as bill discounts for households near Transmission infrastructure.