East Pye Solar

Applicant's Response to Block East Pye Solar's Deadline 1 Submissions

Revision 1

October 2026

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The Infrastructure Planning (Examination Procedure) Rules 2010

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides the Applicant's response to relevant documents submitted by Block East Pye Solar (BEPS) and BEPS-Great Moulton (BEPSG) at Deadline 1.

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

- **The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies [EN0110014/EXAM/9.29]**
- **The Applicant's Response to the Local Impact Report [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 – Parish Councils and Non-Statutory Organisations [EN0110014/EXAM/9.33]**
- **The Applicant's Response to Submissions Received at Deadline 1 – Members of the Public [EN0110014/EXAM/9.34]**

1.1.3 The Applicant has considered all suggested locations for the Accompanied Site Inspection submitted at Deadline 1 in revision 2 of the **Applicant's Draft Itinerary for the Accompanied Site Visit [REP1-082]**, which has been 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 the Deadline 1 Submissions received from Block East Pye Solar and BEPS-Great Moulton and sets out the Applicant's approach to responding to these submissions.
- **Section 2** of this document presents the Applicant's response to BEPS Deadline 1 Submissions the Applicant has responded to at Deadline 2. This includes the Applicant's response to BEPS' Consolidated Summary,

set out in **Table 2.1** and the Applicant's response to BEPS' comments on Design, The Works Plan and the Draft DCO in **Table 2.2** and **Table 2.3**.

- **Section 3** of this document presents the Applicant's response to Deadline BEPS-Great Moulton's Deadline 1 submissions that the Applicant is responding to at Deadline 2. This includes the Applicant's Response to BEPS-Great Moulton's Written Summary on the BESS, Project Substations and Associated Site 1 Grid Infrastructure, set out in **Table 3.1**, the Applicant's Response to BEPS-Great Moulton's Written Summary of Representation – Site 1 / Great Moulton Grid Infrastructure in **Table 3.2**, and the Applicant's response to the Noise Impact Assessment Report submitted by Oakridge Taylor on behalf of BEPS in **Table 3.3**.

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 Assessment
Outline CEMP	Outline Construction Environmental Management Plan
Outline OEMP	Outline Operational Environmental Management Plan
Outline DEMP	Outline Decommissioning Environmental Management Plan
Outline SRMP	Outline Soil Resources Management Plan
Outline PRoWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
Outline LEMP	Outline Landscape and Ecology Management Plan
Outline ESSCS	Outline Employment, Skills and Supply Chain Strategy
Outline BSMP	Outline Battery Safety Management Plan
Outline CTMP	Outline Construction Traffic Management Plan
Outline OTMP	Outline Operational Traffic Management Plan

1.3 Applicant's Approach

1.3.1 At Deadline 1, both BEPS and BEPSG submitted extensive representations, including a number of detailed topic-specific and site-specific reports, supporting technical appendices and accompanying written summaries. The Applicant has set out its full approach to responding to these submissions in

1.3.2 **Table** 1.2.

1.3.3 Deadline 1 submissions from BEPS and BEPSG were published on 14 and 15 October for responses by Deadline 2 (27 October). The Applicant has sought to approach the submissions as efficiently and rapidly as possible in this period to provide the ExA as comprehensive responses as possible. Given the volume of material submitted, and the substantial overlap between many of the issues raised previously, the Applicant has adopted a proportionate and pragmatic approach to its response. This section is intended to set out the approach taken and any further activity that the Applicant intends to undertake relating to the Deadline 1 BEPS and BEPSG submissions.

1.3.4 The Applicant has principally responded to the written summary documents of larger Written Representations and other Deadline 1 submissions by BEPS and BEPSG where those documents were expressly presented as summaries of longer reports. The Applicant notes that the purpose of the summary documents is to identify and present the principal objections, concerns and examination requests arising from the Written Representation reports, thereby assisting the Examining Authority and Interested Parties in understanding the key issues being raised.

1.3.5 In addition, given the substantial volume of material received at Deadline 1, the Applicant's specialist technical teams have, where reasonably practicable, undertaken proportionate reviews of the relevant chapters and sections of the underlying reports in order to satisfy themselves that the responses provided substantially address the matters raised. Where specific issues have previously been addressed in application documents, such as Statements of Common Ground (available under **[REP1-085 to REP1-096]**), responses to Relevant Representations (available under **[PDA-009 to PDA-012]**), responses to the Examining Authority's questions **[REP1-083]** or other examination submissions (available under **[REP1-098] [REP1-099], [REP1-100], [REP1-102] and [REP1-103]**), the Applicant has sought to avoid unnecessary repetition and has cross-referred to those existing responses where appropriate.

1.3.6 The Applicant acknowledges that BEPS and BEPSG submitted a number of supporting technical reports and specialist appendices at Deadline 1. Given the volume and technical nature of this material, the Applicant has undertaken a proportionate review of those reports through its specialist technical teams. Responses to these reports and accompanying appendices have been provided within this document where possible, or will be provided at Deadline 3.

1.3.7 The Applicant also notes the significant degree of overlap between the various BEPS and BEPSG submissions. Many of the objections raised in the topic-specific reports repeat, expand upon or reframe issues previously raised in Relevant Representations, Written Representations, summary reports and other examination submissions, including matters relating to alternatives, site selection, ecology, water environment, transport, landscape, noise, cumulative effects, development flexibility, DCO drafting and post-consent controls.

1.3.8 The Applicant therefore considers that the approach adopted provides a proportionate means of responding to the principal issues raised by BEPS and

BEPSG identified within the summary documents, and where relevant the supporting material contained within the full reports, whilst avoiding duplication resulting from multiple submissions which raise materially similar concerns.

1.3.9 Nevertheless, recognising the breadth of the material submitted at Deadline 1, the Applicant may provide further responses at Deadline 3 where necessary, or where further review by the Applicant identifies a need for a supplementary response.

Table 1.2 List of Block East Pye Solar (BEPS) and BEPS-Great Moulton's Deadline 1 Submissions and the Applicant's Approach

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
REP1-323	Consolidated Summary of BEPS Written Representations	Block East Pye Solar (BEPS)	Summary of Written Representations	The Applicant has responded in detail to the Consolidated Summary of BEPS Written Representations [REP1-323] within Table 2.1 of this document. The Applicant's understanding is that this consolidated summary sets out the key issues raised by BEPS across [REP1-386], [REP1-394] and [REP1-387].
REP1-386	Written Representations submitted in response to East Pye Solar Volume 1: Chapters 1-7	Block East Pye Solar (BEPS)	• Overarching objection; • Compulsory acquisition and DCO powers; • Need case; • Alternatives; • Scheme definition; • Climate change; • Landscape.	
REP1-394	Written Representations Submitted in response to East Pye Solar –	Block East Pye Solar (BEPS)	• Ecology and biodiversity; • Water environment; • Cultural heritage.	

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
	Volume 2: Chapters 8 to 10			
REP1-387	Written Representations Submitted in response to East Pye Solar – Volume 3: Chapters 11-20	Block East Pye Solar (BEPS)	• Transport; • Noise; • Air quality; • Socio-economics; • Soils; • Ground conditions • EMF • Other environmental matters, • Cumulative effects and residual effects.	
REP1-396	Appendix: A-Q	Block East Pye Solar (BEPS)	Appendix A – Norfolk Barbastelle Study Group Survey Report - January 2025	The Applicant notes this report and has referenced data provided within this in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix - 8.6 Bat Activity Survey Report [APP-157]** in addition to data purchased directly from Norfolk Barbastelle Study Group.

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
			Appendix B – Botanist Letter to East Pye Solar, 2025	The Applicant notes this report and will provide a response separately at Deadline 3.
			Appendix C – Norfolk Rivers Trust, Crayfish River Tas Crayfish evidence email	The Applicant notes the additional records provided by Norfolk Rivers Trust in Appendix C. Since the initial submission, the Applicant has independently engaged with Norfolk Rivers Trust and received the same information, confirming an extant population at a site within the wider River Tas catchment. The Applicant will update the relevant sections of **ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP-160]** at Deadline 3 to reflect this additional baseline information. However, the information does not alter the identified impact pathways, receptor assessment or conclusions of the Environmental Statement.
			Appendix D – Hannah Fraser Consulting Ltd. (HFCL), Independent Review of East Pye Solar Environmental Statement: Water Environment, Report 31375R1 (also submitted separately as [REP1-370])	The Applicant notes this report and will provide a response separately at Deadline 3.

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
			Appendix E – Independent Heritage Impact Assessment Report, October 2026	The Applicant notes the *Heritage Impact Assessment of the Proposed East Pye Solar Farm* produced by David Edleston, which has been submitted on behalf of BEPS. The Applicant considers that the assessments of heritage assets provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]** has been undertaken in accordance with the appropriate legislation, policies and guidelines, and best practice, and are robust and appropriate for the assessment of the Scheme. Likewise, the scope, methodology and baseline assessment utilised within the above documents have been supported by both Historic England, as stated within **Statement of Common Ground with Historic England [REP1-089]** and the South Norfolk District Council Senior Heritage & Design Officer, as stated within the **Statement of Common Ground with South Norfolk District Council [REP1-086]**. The Applicant acknowledges the disagreements in levels of harm to heritage

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
				assets between the Heritage Impact Assessment provided by the Interested Party and the Applicant, and notes that these disagreements are primarily down to differences in professional judgement (see **ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]**).
			Appendix F Transmission Solar Developers lobbying DESNZ for Tx+Dx	The Applicant refers to the response provided at WR-BEPS-007 of this document, and BEPS-010 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
			Appendix G – Macquarie/DESNZ FOI Bundle	The Applicant refers to the response provided at WR-BEPS-007 of this document, and BEPS-010 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
			Appendix H – Macquarie / DESNZ Lobbying timeline	The Applicant refers to the response provided at WR-BEPS-007 of this document, and BEPS-010 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies,**

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
				Undertakers and Notable Parties [PDA-010].
			Appendix I – NESO Methodology FOI	The Applicant has no further comments on Appendix I.
			Appendix J – NESO, Gate 2 Criteria Methodology, 12 June 2026	The Applicant notes that in their 17 September 2026 consultation proposal, Ofgem stated that "the scale of the [connections] queue makes it difficult to know which projects are genuinely likely to be built." For that reason, Ofgem are consulting on introducing financial commitments pre connection to incentivise "projects that may never connect" to leave the queue. Section 5.3 of the Statement of Need describes development pipelines and the attrition of projects from those pipelines. The Applicant considers attrition in development timelines to be an important justification for the optionality government seeks to retain in aiming for a clean power system, the policy support for which is described in the Applicant's summary response to Appendix F above. Government has retained optionality in setting the Clean Power capacity ranges and the success or otherwise of prioritised projects to enter commercial operation will

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
				inform subsequent revisions of those ranges, and therefore future queue prioritisation events. Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future reprioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS.
			Appendix K – Natural England, Definition of Favourable Conservation Status for Barbastelle Bat, RP2974, Edition 1	The Applicant notes this report (which addresses Barbastelle Bat favourable conservation status (FCS)) and has provided further information regarding FCS within NCC-035 & SNC-073 in **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]** and additional information provided within NCC-035 within **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]**.
			Appendix L - Tinsley et al. (2023), 'Renewable energies and biodiversity: Impact of ground mounted solar photovoltaic sites on bat activity', Journal of Applied Ecology	The Applicant notes this report and will provide a response separately at Deadline 3.

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
			Appendix M – Barré et al. (2023), 'Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms', Journal of Applied Ecology	The Applicant notes this report and will provide a response separately at Deadline 3.
			Appendix N – Carvalho et al. (2025), 'Plant and soil responses to ground-mounted solar panels in temperate agricultural systems', Environmental Research Letters 20024003	The Applicant has provided a response to this under WR-BEPS-134 in Table 2.1 of this document.
			Appendix O – ADAS/Welsh Government, The Impact of Solar Photovoltaic Sites on Agricultural Soils and Land	The Applicant has provided a response to this under WR-BEPS-132 in Table 2.1 of this document.
			Appendix P – ISEP, Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports, 12 January 2025	The Applicant notes this report. The document is industry guidance on what to cover in an ES. The document is referenced at 15.3.7 and reference 15-28 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The contents have been considered in the ES and, as confirmed at 15.5.3 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** in the checklists from that document have been reviewed and the points raised have been covered in the assessment.

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			Appendix Q – Personal Impact Statements by BEPS Members (appears to have been submitted separately as REP1-391]	The Applicant has reviewed and considered all personal impact statements appended to BEPS' Deadline 1 submissions. The Applicant refers to responses provided in **The Applicant's Response to Relevant Representations Part 5 – By Theme [PDA-012]** and **The Applicant's Response to Deadline 1 Submissions – Members of the Public [EXAM/9.34]**.
REP1-391	Appendix R: Personal Impact Statements received by Block East Pye Solar	Block East Pye Solar (BEPS)		This submission is understood to be Appendix Q referred to above.
REP1-390	Written representations (WR) and summaries of any WR which exceed 1500 words	BEPS-Great Moulton	The submission states that 'written representations have been compiled with residents of the village with BEPS-Great Moulton, who are part of BEPS'.	The Applicant notes this comment.
REP1-329	Written Summary Of Representation	BEPS-Great Moulton	The main points set out as headers within the summary document are listed as follows:	The Applicant has responded in full to the Written summary of representation – Battery Energy Storage System, Project Substation,

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
	Battery Energy Storage System, Project Substation And Associated Site 1 Grid Infrastructure		• Need, deliverability and alternatives of the BESS; • Definition of the development and design certainty; • BESS safety, firewater, and emergency response; • Groundwater and private water supplies • Noise and the very quiet rural environment; • Landscape, ecology, agricultural land, and rural character • Access, PRoWs and Hundred Lane/RB19 • Cumulative effects, permanence and post-year-60 position.	and Associated Site 1 Grid Infrastructure **[REP1-329]** within Table 3.1 of this document. The Applicant's understanding is that the Written summary of representation – Battery Energy Storage System, Project Substation, and Associated Site 1 Grid Infrastructure **[REP1-329]** sets out the key issues raised within the 'East Pye Solar – Battery Energy Storage System Tivetshall / Great Moulton borders' **[REP1-385]**. The Applicant notes that the summaries consolidate the principal objections in the underlying representation. The Applicant has therefore structured its response by reference to the summaries, while also having regard to the supporting evidence, examples and location-specific matters contained in the fuller submission. Where detailed passages in the underlying representation support an issue identified in the summaries, those matters are addressed through the Applicant's response to the corresponding summarised issue. Appendix 2 comprises an 'Independent Noise Impact Assessment Review' submitted by Oakridge Environmental; Services 'on behalf of the village of Great Moulton and the
REP1-385	Objection submitted in response to East Pye Solar – Battery Energy Storage System	BEPS-Great Moulton	The full report is supported by the following Appendices: • Appendix 1 – External BESS Safety Comparator;	

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
	Tivetshall / Great Moulton borders		• Appendix 2 – Independent Noise Impact Assessment Review • Appendix 3 – Professional Article on Solar / Bess Noise	Tivetshalls.' The Applicant has addressed the principal issues raised by this report within Table 3.3 of this document.
REP1-328	Written summary of representation – Site 1 / Great Moulton Grid Infrastructure	BEPS-Great Moulton	The main points set out as headers within the summary document are listed as follows: • Site selection, alternatives and grid deliverability; • Permanence, design flexibility, and DCO controls; • Landscape, residential amenity and noise; • Agricultural land, water and ecology; • Access, Public Rights of Way, safety and whole-life effects; • Cumulative Effects and requested Examination approach.	The Applicant has responded in full to the 'Written summary of representation – Site 1 / Great Moulton Grid Infrastructure' **[REP1-328]** within Table 3.2 of this document. The Applicant's understanding is that the 'Written summary of representation – Site 1 / Great Moulton Grid Infrastructure' **[REP1-328]**' sets out the key issues raised within Site 1 – Great Moulton: Assessing the Full Extent of the 1A-1D Development Footprint **[REP1-389]**. The Applicant notes that the summaries consolidate the principal objections in the underlying representation. The Applicant has therefore structured its response by reference to the summaries, while also having regard to the supporting evidence, examples and location-specific matters contained in the fuller submission. Where detailed passages in the underlying representation support an issue identified in the summaries, those matters are addressed
REP1-389	Site 1 – Great Moulton: Assessing the Full Extent of the 1A-1D Development Footprint	BEPS-Great Moulton		

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
				through the Applicant's response to the corresponding summarised issue.
REP1-395	N/A	Block East Pye Solar (BEPS)	Sets out that the land parcel objections for Sites 3, 6, and 7 are part of 11 land parcel objection documents covering the entire scheme to be read in conjunction with the LVIA report compiled and submitted by Hempnall Parish Council, and the specialist reports on Barbastelles, Hydrology/Hydrogeology and Cultural Heritage submitted in the BEPS WR appendix. The submission states that objections to other Land Parcels are being submitted by individual Parish Councils.	The Applicant notes the three objections to Site 3, 6, and 7. The Applicant is considering whether there are any specific issues raised through these documents which have not been substantially addressed in previous response and will provide a response to any such matters identified at Deadline 3, if necessary.
REP1-393	Objection to Land Parcel 3	Block East Pye Solar (BEPS)	Objection to Site 3.	
REP1-392	Objection to Land Parcel 6	Block East Pye Solar (BEPS)	The document states that Site 6 is 'undeliverable in principle' because it is proposed to serve a construction compound and a biodiversity and	

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
			landscape mitigation area, which are incompatible functions.	
REP1-388	Objection to Land Parcel 7	Block East Pye Solar (BEPS)	The document requests the removal of Site 7 from the Order Limits.	
REP1-192	BEPS Response on Design, the Work Plans, and the Draft Development Consent Order	Block East Pye Solar (BEPS)	This document focuses on the Works Plans, Draft DCO, and Design Principles, Parameters and Commitments.	This submission has been responded to in full by the Applicant within Table 2.2 and Table 2.3 of this document.
REP1-113	Answers to Selected ExQ1 Questions	Block East Pye Solar (BEPS)	Responses provided by BEPS in relation to ExQ1.1.2, Q1.2.2(d), Q1.2.10, Q1.2.15, Q1.3.2, Q1.4.1, Q1.6.4, Q1.9.1, Q1.10.1, Q1.10.7, Q1.8.2, Q1.15 and Q1.16	The Applicant's position is that the key issues raised within this response document have principally been addressed through the responses to other BEPS submissions at Deadline 1 and therefore has not responded to this document individually.
REP1-197	BEPS response to the Applicant's responses to Relevant Representation	Block East Pye Solar (BEPS)	Response provided by BEPS to the '**Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties' [PDA-010].**	It is understood by the Applicant that this document does not raise new objections; but rather argues that the Applicant has failed to meaningfully answer a number of concerns raised in BEPS's Relevant Representations and that many issues remain unresolved. The Applicant's position is that the key issues raised within this response document have principally been addressed through the

Examination Library Reference	Name of Document	Submission Received From	Summary of the Content of the Submission	Applicant's Position
				responses to other BEPS submissions at Deadline 1 and therefore has not responded to this document individually.
REP1-249	N/A	Block East Pye Solar Great Moulton	Post-hearing submission.	The Applicant has considered these submissions and refers to its response provided to Interested Parties at Open Floor Hearing 1 and Open Floor Hearing 2 in the following submission documents: • **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]** and • **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP1-100]**.
REP1-384	N/A	Block East Pye Solar (BEPS)	Request to speak at open floor hearing 1 on 15 September 2026.	

2 The Applicant's Response to Block East Pye Solar

2.1 The Applicant's Response to the Consolidated Summary of BEPS's Written Representations

Table 2.1 The Applicant's Response to Block East Pye Solar [REP1-323]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-001	Sentiment Need for the Scheme	BEPS objects to East Pye Solar as a whole. The objection is not to solar generation in principle. It is that the Application has not demonstrated that this particular 500 MW-scale transmission-connected development, dispersed across approximately 1,212 hectares of South Norfolk, is environmentally acceptable, appropriately configured, physically deliverable and sufficiently defined and controlled to justify development consent or the extensive compulsory powers sought.	The Applicant notes this comment. The **Statement of Need [APP-206]** describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse effects of the Scheme are demonstrably outweighed by the Scheme's benefits and needs case. The Application contains a comprehensive assessment of the likely environmental effects of the Scheme in the **ES Chapters [APP-036 to APP-056]** and includes extensive mitigation, control and monitoring measures where appropriate. The Scheme has been subject to Environmental Impact Assessment and consultation with relevant statutory bodies and stakeholders. The Applicant considers that the

ID	Theme	Comments/Issues Raised	Applicant's Response
			likely significant effects have been robustly assessed and that the Scheme is environmentally acceptable. The Applicant further considers that the Scheme has been appropriately designed and sufficiently defined for the purposes of the DCO Application. The assessment has been undertaken on the basis of the Scheme as applied for, taking account of the parameters and controls secured through the **Draft DCO [REP1-014]**.
WR-BEPS-002	Policy Compliance	Since BEPS prepared its Written Representations, a new National Planning Policy Framework was published on 17 August 2026. The NPPF does not contain the specific policy framework for nationally significant infrastructure projects: it expressly confirms that NSIPs remain determined in accordance with the Planning Act 2008 and the relevant National Policy Statements, together with any other relevant matters, which may include the NPPF. The Energy NPSs therefore remain the primary policy framework for East Pye Solar. The new NPPF is nevertheless materially relevant because several of its national decision-making policies directly reinforce	The NPPF does not contain specific policies for NSIPs such as the Scheme. The Scheme will be determined in accordance with the National Policy Statements (namely NPSs EN-1, EN-3 and EN-5) pursuant to s104 of the Planning Act 2008. However, the NPPF may still be considered by the Secretary of State to the extent it is important and relevant to the decision. The new NPPF now no longer refers to 'valued landscapes' and 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. An update of the implications of the new NPPF on the Scheme were provided in the updated **Planning Statement [REP1-074]** submitted at Deadline 1. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		issues already before this Examination. Those include the need for development to respond to the history, character and features of its site and setting; for design quality to be considered throughout the evolution, assessment and delivery of a proposal; for significant biodiversity harm first to be avoided through location on an alternative site with less harmful effects; for agricultural land quality and grade to be taken into account and poorer-quality agricultural land used where possible; for ecological networks extending beyond the site to be strengthened; for PRoWs to be protected and enhanced; for tranquillity, intrinsically dark landscapes and chalk streams to be protected from relevant pollution effects; for development to be steered towards areas at lowest flood risk; and for heritage harm and effects on setting to receive the weight specified by the new heritage policies.	

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-003	Need for the Scheme Policy Compliance	Those policies do not create a new test requiring the Applicant to prove a generic national need for renewable energy. Policy W3 states that substantial weight should be given to relevant renewable-energy and energy-security benefits and that applicants should not generally be required to demonstrate the need for renewable or low-carbon energy development. The issue raised by BEPS is different: what benefits are actually demonstrated and deliverable from this Scheme, in this configuration and location, and whether those benefits outweigh the particular harms identified through the Examination.	The Applicant notes that BEPS accepts that the Applicant does not need to demonstrate a national need for renewable energy generation. Rather, the question for the Examination is what weight should properly be given to the specific benefits arising from the Scheme. Policy W3 does not preclude that assessment. Indeed, the use of the word "generally" acknowledges that the weight attributed to a Scheme's benefits remains a matter for the decision-maker in the circumstances of the particular case. The relevant issue is therefore whether the benefits of the Scheme that have been identified in the **Planning Statement [REP1-074]** are sufficiently evidenced and deliverable, and whether they outweigh the harms arising from the Scheme. NPS EN-1 states that the government has established that there is an urgent need for low-carbon generation infrastructure, including large-scale solar developments, and that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. (Paragraphs 3.2.8 and 3.2.9). Paragraph 3.2.10 goes on to explain that "The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS." Paragraph 3.2.22 of the **Statement of Need [APP-206]** explain that the Scheme meets the definition of CNP Infrastructure because it is for the development of solar generation capacity. As CNP infrastructure, the urgent need for the Scheme to assist in achieving the UK's energy objectives, together with the national security, economic,

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			commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy (see also NPS EN-1 Paragraph 3.3.63). It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse effects of the Scheme are demonstrably outweighed by the Scheme's benefits and needs case.
WR-BEPS-004	Draft DCO Compulsory Acquisition	The preliminary objection concerns the statutory powers sought for a Scheme whose final implementation remains materially uncertain. The Order Limits extend to approximately 1,212.3 ha. The draft DCO seeks power under Article 21 to acquire interests in land, including freehold, together with permanent rights, restrictions and temporary-possession powers. Compulsory freehold powers extend to parts of Work No. 1, the solar generating station itself, as well as the BESS, substations and other Works. Yet the Applicant's Statement of Reasons confirms that Option Agreements have already been entered into for the Solar PV Sites, BESS and substations and expressly refers to the possibility	The Applicant's preference is to enter into voluntary agreements for the land and rights required for the Scheme. However, as is standard in Nationally Significant Infrastructure Project (NSIP) solar schemes the **Draft DCO [REP1-014]** includes provision for compulsory acquisition of land and rights. These powers are sought to ensure the deliverability of the Scheme if voluntary agreements cannot be completed, are not complied with, or subsequently fall away. The powers are, as such, necessary and proportionate to ensure the deliverability of the Scheme. The Applicant confirms that negotiations for the voluntary agreements are tracked in the **Land and Negotiations Tracker [REP1-020]**. The Applicant confirms that land identified as being required for the solar array, BESS & substations is secured by existing voluntary option agreements. The **Draft DCO [REP1-014]** includes powers to compulsorily acquire the freehold of these plots because it is not possible to acquire a new leasehold interest using compulsory acquisition powers The Applicant has adopted a proportionate approach to the type of interest sought. Compulsory acquisition of rights has

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		of a landowner failing to grant the Applicant the lease contemplated by an Option Agreement. The Applicant therefore appears to contemplate leasehold occupation voluntarily while seeking a statutory power capable of permanently acquiring the freehold compulsorily. That distinction engages the separate statutory test in section 122 of the Planning Act 2008. A need to control land for 60 years does not, without further justification, establish a need to own the freehold permanently. Nor does compensation answer that prior question of necessity. The Applicant must demonstrate why the particular interest sought is required and why a lesser interest – leasehold, permanent rights, restrictions or temporary possession – would not suffice. The problem is intensified by uncertainty over the development for which those powers are sought. The Solar generation element has Gate 2 Phase 2	been preferred to freehold acquisition wherever practicable, and temporary possession has been preferred where a permanent interest is not required. In respect of the underground cabling, the Applicant intends to carry out the works using the temporary possession powers and only acquire permanent new rights in respect of the as laid cable. This approach ensures that no more land or rights is acquired than is reasonably required. With regard to grid connection, section 2.7 of the **Statement of Need [APP-206]** sets out the connection process. The solar element of the Scheme has a Gate 2 Phase 2 prioritisation with an indicative connection period of 2031–2035; the BESS currently has Gate 1 prioritisation and no confirmed indicative connection date. The Applicant relies on established policy that consent need not be refused because a firm grid connection date is not yet available, and the connection risk is a commercial one for the Applicant to manage. To the extent that any individual Work is not ultimately constructed, the associated compulsory powers would not be exercised. The BESS has a direct functional relationship with the solar scheme (it stores surplus solar output, supports grid flexibility and operates at a scale proportionate to the array) and the land associated with it is accordingly required for the authorised development as a whole.

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		prioritisation, whereas the BESS remains at Gate 1, with no confirmed indicative connection date and no clear mechanism to get one. The DCO may permit solar without BESS, delayed or reduced BESS, partial build-out and unused cable or substation infrastructure. Compulsory powers should not continue over land required only for an optional or ultimately omitted Work.	
WR-BEPS-005	Need for the Scheme Point of Connection	The National Grid position is more fundamental. NGET states that the replacement connection agreement is not expected to require East Pye to secure the land or consent for the proposed National Grid Substation; that DCO consent would not oblige NGET to use that substation; and that the final point-of-connection solution cannot yet be confirmed. The land requirement therefore remains contingent upon an unresolved transmission solution. Permanent compulsory acquisition cannot properly be justified merely	As explained in section 2 of the **Grid Connection Statement [REP1-072]**, the Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. Consent is being sought for the National Grid Substation in a location that the Applicant considers suitable based on National Grid Electricity Transmission's criteria. Compliance with the Horlock Rules is set out within the **Site Selection Assessment [APP-215]**. The Applicant therefore considers that the suitability of the proposed location for the National Grid Substation has been demonstrated within the Application documents. As set out at paragraph 4.1.2 of the **Grid Connection Statement [REP1-072]**, NGET has confirmed that there is sufficient space in the proposed area for the new National Grid Substation. Under this DCO Application, all necessary land and rights will be established for NGET to undertake

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		to preserve one possible future connection option. The preliminary chapter consequently establishes a legal-control problem which persists throughout the WR: the Applicant seeks broad statutory powers before the Scheme, land requirement, connection solution and mitigation package have been resolved with corresponding precision.	works to build the new National Grid Substation either via voluntary agreement or by use of compulsory acquisition and temporary use powers in the DCO. The Applicant also refers to National Grid Electricity Transmission Plc's Relevant Rep [RR-1408] and the Applicant's response at NGET-006 and NGET-007 in **The Applicant's Response to Relevant Representations Part 2 [PDA-009]** which sets out information regarding the Applicant's grid connection for the generating station and the BESS.
WR-BEPS-006	Need for the Scheme Policy Compliance	Chapter 1 accepts the strong national policy support for renewable generation and the substantial weight which national policy attaches to relevant energy-security and net-zero benefits. The issue is not whether the Applicant must prove a generic national need for solar generation: the August 2026 NPPF expressly states that applicants should not generally be required to demonstrate such need. The material distinction is instead between that generic national policy position and the project-specific benefits, deliverability, configuration and environmental	The Applicant refers to its response to WR-BEPS-003.

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		consequences of East Pye Solar itself. Gate status, regional pipeline evidence and national renewable-energy objectives do not determine whether every component of this particular Scheme will be delivered as assessed, whether the particular dispersed configuration is environmentally justified, or what weight can properly be given to benefits that remain contingent or unquantified.	
WR-BEPS-007	Need for the Scheme	BEPS's evidence records approximately 4,015 MW of renewable generation already within the T7 long-term planning pipeline by January 2026, around 96% of it solar, against the 3,300 MW CP2035 T7 Tx+Dx solar modelling envelope. BEPS does not contend that 3,300 MW is a statutory cap. The material point is that NESO's FOI response records that its Gate 2 'at/over CP2035' assessment used only operational capacity—552.84 MW at the Gate 2 window close—rather than the wider consented and in-planning pipeline. Gate 2 allocation	The Applicant notes that BEPS have provided an assessment of NESO's analysis of regional capacity. Paragraph 3.2.5 of NPS EN-1 explains that the Clean Power 2030 Action Plan should be used to inform developments of new energy infrastructure projects. Page 31 of the Clean Power 2030 Action Plan explains that government considers that it is right that optionality is retained by government in relation to the setting of the clean power capacity ranges. Paragraph 3.2.6 of NPS EN-1 is therefore consistent with this approach and explains that "it is not the government's intention that any figures or targets [including the clean power 2030 capacity ranges] in this NPS should propose limits on any new infrastructure that can be consented in accordance with the energy NPSs". Paragraph 2.9.15 of the **Statement of Need [APP-206]** explains that in Planning for New Energy Infrastructure Consultation Response (the consultation on the new NPSs), the Government states that: 'Clean Power 2030

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		therefore does not, without more, establish an unmet T7 need which East Pye Solar is required to satisfy.	... is not a fixed ceiling on technology deployment or project approvals.' Therefore, whether there are Tx or Dx capacity ranges and what those are, do not detract from paragraphs 3.2.8 to 3.2.9 of NPS EN-1 which explain that there is an urgent need for low-carbon infrastructure, and that substantial weight should be given to that need.
WR-BEPS-008	Need for the Scheme	The connection case is also less certain than a simple statement of Gate 2 status suggests. The WR records that formal revised transmission offers are subject to further engineering review, while the associated BESS remains Gate 1. The Scheme therefore cannot derive firm project-specific balancing, congestion or flexibility benefits from a storage component whose equivalent connection position has not been demonstrated. The significance of East Pye's Gate 2 status must be understood in the context of the material change made to the regional solar targets immediately before Ofgem approved connections reform. NESO's original Clean Power 2030 'independent' advice did not envisage a system dominated by transmission-connected solar. Its	The Applicant refers to its response to WR-BEPS-007.

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		pathways assumed that approximately 90% of solar capacity would be connected to the distribution network, expressly noting that the connections queue already contained more solar capacity than was required. The December 2024 Connections Reform framework reflected that approach by applying separate transmission and distribution regional allocations. In T7 East Anglia zone the original transmission-solar allocation was only 100 MW for 2030 and approximately 900 MW for 2031–35. NESO's own December 2024 assessment showed a transmission-solar queue in T7 many times larger than that 2035 allocation.	
WR-BEPS-009	Need for the Scheme	In 'Connections Reform Results', NESO writes: 'Each zone has its own limits on how much new energy can be connected, and these limits are set separately for different types of technology—batteries (which store electricity), solar (which generates power from	The Applicant refers to its response to WR-BEPS-007.

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		sunlight), and onshore wind (which uses wind turbines on land). Zones are important because they help make sure the electricity grid isn't overloaded in any one area, and that the right types of energy projects are built where they're most useful. This careful system planning helps deliver a secure energy system, drive consumer value and pave the way to a sustainable energy future.' The subsequent change by DESNZ to the regional solar targets was not prompted by a finding that the overall national solar requirement had increased. Or that there was additional need or capacity in zone T7. It arose because the volume of large transmission-connected projects already being promoted did not fit the transmission allocations in specific regional zones. On 7 April 2025 DESNZ stated expressly that there was a 'misalignment' because the increased transmission solar pipeline had not been reflected in the modelling underlying the original Clean	

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		Power 2030 advice. Following what DESNZ described as 'extensive' engagement with Ofgem, NESO and stakeholders, it decided to amalgamate the transmission and distribution solar allocations for 2031–35. The total national solar allocation was not increased; the distinction between the two network levels was removed, enabling the most advanced projects to compete for one combined regional allowance. For T7, the resulting 2035 Tx+Dx solar capacity became 3,300 MW. That policy change occurred against documented engagement with transmission-scale solar developers. BEPS's documentary record obtained through EIR and FOI includes the 3 December 2024 letter from Island Green Power and other solar developers seeking changes to the regional connections methodology. More significantly, NESO's subsequent EIR disclosure confirms a January 2025 email thread and meeting involving Macquarie, DESNZ and NESO. Macquarie proposed a	

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		'deep dive' into '6-7' case studies which were 'assets of Island Green Power', and sought to 'sense-check' NESO/DESNZ thinking. The disclosed list of projects to be walked through expressly included the 500 MW 'Long Stratton PV & Bess Station (East Pye)' in T7. The disclosed slides reveal that T7 was the first of the project-specific case studies discussed at the 27 January 2025 meeting between DESNZ Macquarie at the latter's London offices. The FOI documents demonstrate that East Pye Solar itself was expressly before DESNZ as part of Macquarie/IGP's project-specific discussion of the consequences of connections reform. East Pye Solar Ltd is a subsidiary of Island Green Power, which is wholly owned by Macquarie Asset Management. DESNZ is in a quasi-judicial capacity as decision-maker on granting development consent to this project	
WR-BEPS-010	Need for the Scheme	The Ofgem evidence makes the consequence of that change to	The Applicant refers to its response to WR-BEPS-007.

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		combine distribution and transmission targets particularly important. Its 15 April 2025 TM04+ Impact Assessment records a T7 combined 2035 solar allowance of 3.3 GW. Against that allowance, Ofgem identified 660 MW already built, 122 MW under construction, 380 MW with planning consent and 3,418 MW with planning submitted. Thus, projects already built or at least in the planning system totalled approximately 4.58 GW, around 1.28 GW above the new 3.3 GW T7 regional allowance, before adding a further 2,180 MW recorded as having land rights and 4,531 MW whose land-rights status was unknown. Ofgem's own Gate 2 modelling went further: its medium scenario filled the entire 3,300 MW T7 allowance with 660 MW built, 122 MW under construction, 380 MW consented and 2,139 MW of planning-submitted projects, with no capacity required from the land-rights-only category. Ofgem itself described the wider queue as	Ultimately, this representation is questioning the data and analysis provided by others. However, the Applicant notes its analysis on development pipelines and historical attrition at Section 5.3 of the **Statement of Need [APP-206]** which provides evidence as to why retaining optionality within capacity ranges is important for the delivery of clean power, and that schemes which have not yet delivered, may not deliver at all (and therefore cannot be counted upon as delivered), at all stages of development.

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		showing 'significant over-supply' of solar and batteries. That chronology materially limits what can properly be inferred from East Pye subsequently obtaining Gate 2 status. It does not establish that the project itself is required to meet an unmet regional generation requirement. Indeed, Ofgem expressly recognised that amalgamating Tx and Dx allocations made substantially more well-advanced solar projects eligible for Gate 2 and increased the solar capacity expected to receive Gate 2 terms from approximately 39 GW to 65 GW nationally. In T7, Ofgem's April 2025 evidence showed that the revised regional allowance could already be filled by projects at planning-submitted stage or beyond. Gate 2 status should therefore not be treated as independent proof that East Pye Solar is necessary: it is an outcome of a methodology which was itself changed because the transmission-project pipeline exceeded the assumptions on	

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		which the original Tx/Dx allocations had been based.	
WR-BEPS-011	Need for the Scheme	This does not require the ExA to find impropriety in the Government's engagement with industry. The narrower and stronger planning point is evidential. The original system analysis anticipated overwhelmingly distribution-connected solar; transmission developers then pressed for changes to a methodology under which large parts of their pipeline risked falling outside the relevant capacity allocations; Government amalgamated the Tx and Dx allocations without increasing the overall national solar requirement; and Ofgem's contemporaneous analysis showed that East Anglia already had more advanced solar capacity in the pipeline than the enlarged combined regional allowance. In those circumstances, **East Pye's Gate 2 status cannot reasonably carry significant weight as evidence of project-specific or locational necessity**. The environmental	The Applicant refers to its response to WR-BEPS-007. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse effects of the Scheme are demonstrably outweighed by the Scheme's benefits and needs case.

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		harms identified throughout this Written Representation must therefore be weighed against the demonstrated benefits of East Pye Solar itself, not against an assumption that Gate 2 proves that this particular 500 MW development is required in South Norfolk.	
WR-BEPS-012	Need for the Scheme	The BESS remains at Gate 1 and, on the evidence presently available, the Applicant has not demonstrated which Gate 2 Strategic Alignment route it is capable of satisfying under NESO's June 2026 Gate 2 Criteria Methodology. Its deliverability is materially uncertain in circumstances where NESO identifies substantial battery oversupply nationally and within T7, and where East Pye does not appear to qualify for the principal planning-based protection routes available to earlier projects. On 18 September 2026, Ofgem announced that the national BESS Gate 2 queue (with confirmed grid connections) is now 61.7GW above the 29GW required by	The Applicant notes this comment and refers to its response to the Great Moulton Action Group's comments under GMAG-015 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The Applicant notes the values presented by BEPS in this written representation. The Applicant notes that in its announcement dated 17th September 2026, Ofgem state that "battery storage has a vital role to play in a clean, flexible energy system." They are therefore consulting on ways "to ensure grid capacity is held by projects that are serious about progressing" because "it is currently difficult to know which projects are genuinely likely to be built". The Applicant recognises that attrition from project development queues may materially impact progress to achieving a clean power system and supports moves to reduce uncertainty in queue delivery. Section 5.3 of the **Statement of Need [APP-206]** provides more information on pipeline attrition in the UK.

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		2035. Ofgem already halved the queue at the beginning of this year in its connections reform process, but is now trying to cull further as so many BESS received Gate 2 due to protections. This oversupply of BESS is particularly extreme in the T7 East Anglia region. East Pye Solar proposes a 500MW BESS. Government's current connections-reform allocation for transmission-connected batteries in the whole of T7 East Anglia is only 200 MW for 2030 and 200 MW for 2035. NESO's February 2026 EIR response disclosed that T7 already has 784 MW of 2030 Gate 2 batteries and 927.6 MW of 2031-35 Gate 2 batteries — 1,711.6 MW in total. It expressly says there is 'significant oversupply of batteries' in T7 relative to the Clean Power 2030 capacity figures. It also records another 4,283.1 MW of Gate 1 batteries in the T7 pipeline (including East Pye Solar's BESS) which did not meet the Gate 2 strategic-alignment or protection	The Applicant reiterates the national policy position that the Capacity Ranges included in the Clean Power 2030 Action Plan are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, paragraph 3.2.6. Therefore, the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS. The Applicant notes that its approach is consistent with NPS EN-1 paragraph 4.11.6 which states that: "Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible." This is demonstrated by the Applicant's assessment of the suitability of the proposed connection point as set out is set out within the **Site Selection Assessment [APP-215]**.

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		requirements and have not been given confirmed grid connections. This means that currently in T7, Gate 2 battery capacity is already approximately 4.28 times the 400 MW regional capacity figure, because protected projects had to be allowed through notwithstanding the zonal limit. The BESS remains at Gate 1 and has no demonstrated route to Gate 2 on the evidence presently available. NESO now says battery permitted capacity for future windows is effectively exhausted unless a project qualifies for one of the remaining protection routes, very large amounts of existing Gate 2 battery capacity leave, or future strategic plans materially increase the permitted capacity (Connection Reform Results)	
WR-BEPS-013	Need for the Scheme	Under NESO's June 2026 Gate 2 Criteria Methodology, the remaining routes relevant to a conventional battery project are: (i) Protection Clause 2b; (ii) Protection Clause 3a; (iii)	The Applicant notes this representation and refers to its response to WR_BEPS-012. Accordingly, the Applicant considers that the absence of a current Gate 2 offer for the BESS does not prevent development consent being granted, having regard to NPS EN-1 paragraphs 3.2.6 and 4.11.6, for the reasons set out in response WR-BEPS-012.

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		Protection Clause 3b; (iv) ordinary alignment with available CP30 battery capacity; or (v) Project Designation. Batteries are expressly within the CP30 framework, so the separate route for technologies outside CP30 is unavailable. Clause 2b applies only where the project holds one of a tightly defined set of qualifying arrangements, including a live CfD, Capacity Market contract, qualifying cap-and-floor or merchant-interconnector approval, or a live NESO Network Services contract. BEPS has identified no evidence that East Pye's BESS holds any such arrangement. Clause 3a requires a planning application submitted on or before 20 December 2024; Clause 3b requires a validated planning application on or before 26 August 2025. East Pye's DCO application post-dates both cut-offs. The ordinary CP30 route is also problematic because T7 is already	

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		substantially oversupplied for batteries. NESO's methodology expressly provides that where a project applies under ordinary CP30 alignment in a technology zone oversupplied both zonally and nationally, the relevant technology stage may be treated as having failed Strategic Alignment before detailed checks or queue formation. That does not apply where a project benefits from protection or designation. BEPS has identified no evidence that East Pye's BESS has been designated or that the Applicant has identified designation as its intended route. NESO's methodology also expressly provides that, for a staged or hybrid project, if one technology meets the Strategic Alignment Criteria and another does not, only the qualifying technology receives a Gate 2 offer. The solar element therefore cannot simply carry the BESS into Gate 2. The BESS needs its own	

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		basis for strategic alignment/protection.	
WR-BEPS-014	Need for the Scheme	The current battery position is especially stark. NESO's own reform-results page says there is presently no permitted capacity for new batteries to enter the pipeline unless: • the project qualifies under Protection Clause 2b or 3a; • more than 55 GW of existing Gate 2 battery projects leave the pipeline; or • future strategic-energy plans increase permitted battery capacity by more than 55 GW. Because East Pye cannot meet 3a on dates, that leaves, in practical terms: 1. obtaining a qualifying 2b support contract before the relevant future CMP434 window closes; 2. more than 55 GW of existing Gate 2 batteries exiting;	The Applicant notes this representation and refers to its response to WR-BEPS-012.

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		3. a future SSEP or other strategic plan increasing battery permitted capacity by more than 55 GW; 4. potentially project designation. Project designation exists, but NESO describes it as 'very rare', expecting only a handful of projects out of thousands to qualify. The current designation criteria are aimed principally at genuinely innovative/new technologies or projects with very long lead times needed beyond 2035. NESO is not currently accepting designation applications under the 'critical to security of supply', 'critical to system operability' or 'materially reduce constraint costs' criteria. A conventional co-located lithium-ion BESS does not obviously fit the presently open designation categories.	
WR-BEPS-015	Need for the Scheme	East Pye Solar's BESS remains Gate 1. The Applicant should therefore identify whether it qualifies for Protection Clause 2b. If it does not, NESO's current published position is that there is	The Applicant notes this representation and refers to its response to WR-BEPS-012.

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		no ordinary permitted battery capacity available in future windows unless more than 55 GW of existing Gate 2 battery capacity exits the pipeline or future strategic planning increases permitted battery capacity by more than 55 GW. The Applicant's reliance on Cottam and West Burton does not demonstrate a pathway for East Pye. Those projects were already substantially progressed through the DCO and connection process before the present connections-reform regime took effect: Cottam obtained development consent in September 2024 and West Burton in January 2025. Their BESS connection positions were 'protected' because they already had DCO consent before the connections reform cut off dates.	
WR-BEPS-016	Need for the Scheme	The Applicant is presenting East Pye Solar as an integrated solar-plus-storage project and claiming the benefits of co-location, while the evidence does not presently show that the storage element can be connected, commissioned or	The Applicant does not agree that the benefits of the Scheme should be discounted on the basis of speculative alternative implementation scenarios. The DCO application seeks development consent for a large-scale solar PV generation station with BESS proposed as associated development to the main solar scheme, together with the associated

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		operated on the same timetable as the solar element — or, on the current connections framework, whether it will be connected at all. The Examination should therefore distinguish between **physical co-location in the DCO application and electrical and temporal co-deliverability**. The fact that the solar arrays and BESS are proposed within the same Order Limits does not establish that they will become operational together, share the same connection timetable or deliver the system benefits attributed to a co-located generation-and-storage project. The Applicant should therefore demonstrate the reasonable implementation scenarios for the authorised Scheme, including: • solar becoming operational substantially before the BESS; • a reduced-capacity, export only, or differently configured BESS; • and solar proceeding for all or a substantial part of its	infrastructure required for its operation. The planning assessment, including consideration of need and benefits, is appropriately undertaken on the basis of the Scheme for which consent is sought. The Applicant therefore considers that the benefits of the Scheme are appropriately described and assessed within the Environmental Statement. The parameters of the Scheme as assessed are contained in **ES Volume 1, Chapter 4 -The Scheme [REP1-022]**.

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		operational life without the BESS. For each scenario, the Applicant should identify which claimed benefits remain, which disappear or are deferred, whether the connection and electrical design remains as assessed, and whether the EIA, construction phasing, replacement assumptions and DCO controls remain robust.	
WR-BEPS-017	Need for the Scheme Draft DCO	The possibility of materially asynchronous implementation also bears upon the Applicant's associated-development case. If Work No. 2 can remain unbuilt while the generating station is constructed and operated, the Applicant should explain the operational and functional relationship which nevertheless justifies consenting the entire 500 MW BESS as associated development to this NSIP. Physical proximity and use of common infrastructure should not substitute for an explanation of the actual operational relationship relied upon.	As explained in response to Norfolk County Council under NCC-081 in **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008]** the scope of the associated development is set out in Schedule 1 of the **Draft DCO [REP1-014]**. The operational and functional relationship between the Scheme and the BESS is set out in the **Statement of Need [APP-206]**, notably in sections 5.11 and 6.9. Finally, the justification for the BESS being associated development is set out in Section 3 of the **Explanatory Memorandum [REP1-016]**. From this it is clear that the BESS is associated development, that it falls within the guidance (DCLG 'Guidance on Associated Development applications for major infrastructure projects' (April 2013)) and is clearly capable of being granted development consent by the Secretary of State pursuant to section 115 of the PA 2008.

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WR-BEPS-018	Need for the Scheme	The Applicant's consumer-benefit case is similarly unproven. The Applicant asserts that East Pye Solar will not cause grid constraints or experience excessive curtailment, but BEPS identifies no disclosed Scheme-specific modelling showing generation profile, competing Gate 2 generation, relevant network constraints, reinforcement dates, BESS operating strategy or expected annual curtailment. Those are material omissions where the Scheme seeks positive weight for affordability and efficient system operation under EN-1. This is a particular concern given the BESS gate 1 status. The benefits attributed to East Pye should therefore be disaggregated rather than treated as arising automatically from a single integrated solar-and-storage scheme. The solar-generation benefit is available if the solar element proceeds, but the flexibility and balancing benefits attributed to the BESS depend upon that storage component	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 benefits of the Scheme have been assessed on the basis of the DCO application as submitted. The need for the Scheme is established within national energy policy. NPS EN-1 states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (NPS EN-1, Paras. 3.2.8 – 3.2.10). The Applicant notes that solar and storage schemes, both separately and co-located, are supported in national policy. For example: • NPS EN-1, paragraph 3.3.23 explains that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar. • NPS EN-3, paragraph 2.10.2 explains that Solar energy is at the heart of the government's Clean Power Mission • NPS EN-1, paragraph 3.3.5 explains the need for increased flexibility

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		obtaining a connection and becoming operational. Any claimed benefit from co-location likewise depends upon the solar and BESS elements being operational on compatible timescales. Claimed reductions in curtailment require evidence that the proposed BESS will actually be connected when needed and is capable of operating in the manner assumed, while any wider system-cost or consumer benefit attributed to storage cannot simply be inferred from the inclusion of a BESS within the DCO. The weight given to those benefits should therefore reflect the demonstrated deliverability of the BESS, rather than the physical co-location of Work No. 2 with the solar generating station.	• NPS EN-1, paragraph 3.3.25 explains that storage has a key role to play in achieving net zero when providing flexibility to energy systems. The assessment of the Scheme is therefore undertaken on the basis of the Scheme as a whole rather than its individual components in isolation. The Applicant considers that the Secretary of State can place substantial weight on the contribution the Scheme would make towards the delivery of renewable energy generation and the wider objectives of decarbonisation and energy security. Further, Section 8.5 of the **Statement of Need [APP-206]** illustrates how solar and wind generation profiles are generally complementary to each other, therefore supporting one conclusion of Section 8.4 of the **Statement of Need [APP-206]**, which describes current curtailment on the GB energy network and explains that the Scheme is geographically distant from areas of the network which currently are constrained. Section 8.4 of the **Statement of Need [APP-206]** states that the Scheme is unlikely to receive consumer-funded compensatory curtailment payments. Early support contracts such as early CfD contracts and the Renewable Obligation scheme, which do not disincentivise low carbon generators from turning off or down when power prices are low or negative (contributing to curtailment and increasing curtailment costs for consumers) are no longer available to new generators.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Section 9.2 of the Statement of Need provides an explanation of how increasing the capacity of renewable assets in GB reduces the traded price of power and reduces the UK's dependency on volatile international energy markets, both providing benefits to electricity consumers. The Applicant notes that the Environmental Statement and supporting application documents assess the likely effects of the Scheme as applied for. The DCO application includes battery storage as part of the Scheme and the associated benefits of the Scheme have been presented on that basis. The Applicant does not agree that the inclusion of battery storage within the Scheme's benefits case is inappropriate simply because concerns are raised regarding future implementation or operation. The planning balance should be undertaken on the basis of the Scheme before the Examining Authority.
WR-BEPS-019	Need for the Scheme	Chapter 1 then applies those weaknesses to good design. The Scheme repeatedly deals with environmental constraints after the development envelope has been established: planting is used to screen landscape harm; habitat creation to address ecological disruption; later drainage to manage hydrological risk; revised haul routes to address highway objections; and later equipment	The Applicant refers to its response to WR-BEPS-029 and WR-BEPS-230. The Applicant also refers to the responses previously provided in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** at Q1.1.1 in relation to the application of the mitigation hierarchy.

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		selection or barriers to resolve noise. Those responses are not necessarily mutually compatible. A woodland screen may itself harm openness, heritage setting or ground-nesting-bird habitat; an internal haul route may avoid a highway problem while creating new ecological, soil, drainage or PRoW effects.	
WR-BEPS-020	Need for the Scheme Policy Compliance	The August 2026 NPPF materially reinforces that design issue. Policy DP3 requires development to respond to the history, character and features of its site and setting so that it integrates with and enhances its surroundings, and includes principles concerning nature, movement, compact built form and strong sense of place. Policy DP4 states that design quality should be considered throughout the evolution, assessment and delivery of development and that approved design quality should not subsequently be materially diminished.	The Applicant's position is that the environmentally-led approach to the design of the Scheme, as set out within the **Design Approach Document [APP-212]** is consistent with Policies DP3 and DP4 of the NPPF (2026), as set out within the **Planning Statement [REP1-074]** and **Policy Compliance Document [REP1-076]**.

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WR-BEPS-021	Need for the Scheme Scheme Description	ISH1 exposed why those principles are material at East Pye. The Applicant confirmed that the Illustrative Masterplan does not secure the final disposition of infrastructure; the precise number and location of significant 33 kV switchrooms/conversion units remain for detailed design; O&M buildings may be distributed across the Sites; fencing design remains capable of further revision; and the ExA requested further information about how major components would actually appear and whether additional parameters could be secured. The ExA was particularly concerned about the potential visual accumulation or "clutter" of ancillary infrastructure. The design question is therefore not simply whether each component has a maximum dimension. It is whether the spatial combination, number and positioning of all components permitted by the DCO have been assessed and whether the design quality relied upon by the	The reasonable 'worst-case' effects arising from the Scheme are identified and reported in the **ES [APP-036 to APP-056]**. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. The **Indicative Masterplan [REP1-025]** sets out the indicative spatial extent of the Scheme components identified in **ES Chapter 4 [REP1-022]**, where these Rochdale envelope parameters are set out. Each technical chapter of the **ES [APP-036 to APP-056]** has assessed the design of the Scheme based on the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified. The spatial extent of each Work Number is secured by the **Works Plans [REP1-005 and REP1-006]** and the **Draft DCO [REP1-014]**. The mitigation measures are included in the relevant outline management plans, such as the Outline CEMP, the Outline LEMP and others, of which the

ID	Theme	Comments/Issues Raised	Applicant's Response
		Applicant is secured rather than illustrative.	corresponding detailed management plans must be substantially in accordance with and approved by the relevant planning authority. Further, the management plans are control documents and so are secured via Requirements in the **Draft DCO [REP1-014]** and as such, being in breach of them would be an offence.
WR-BEPS-022	Need for the Scheme	The chapter therefore establishes the governing question for the whole Examination: whether the Applicant has demonstrated one environmentally coherent and deliverable scheme designed for this particular place, rather than a predetermined 500 MW project whose separate environmental conflicts are expected to be reconciled later. The subsequent chapters demonstrate why that question has not yet been answered satisfactorily.	The Scheme has been brought forward as a single, integrated proposal and has been subject to extensive environmental assessment through the Environmental Statement. The likely significant effects, mitigation measures and residual effects have been assessed on the basis of the Scheme as proposed, with controls secured through the **Draft DCO [REP1-014]** and associated documents. The Applicant considers that the Examination has been provided with sufficient information to conclude that the Scheme is environmentally acceptable, appropriately designed and deliverable and that the benefits of the Scheme outweigh any potential harms.
WR-BEPS-023	EIA Methodology Construction and Decommissioning	Chapter 2 identifies a structural weakness in the Environmental Statement: environmental systems are divided into technical chapters before their interactions are adequately assessed. The receiving environment does not operate in those compartments. Hedgerows are	The Applicant does not agree that the Environmental Statement assesses environmental topics in isolation. In accordance with established EIA practice, **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]** provides the overarching methodology for the assessment, while the individual topic chapters set out the relevant topic-specific methods, standards and significance criteria. Hedgerows are considered where relevant across topics within the ES including within **ES Volume 1, Chapter 7 – Landscape and**

ID	Theme	Comments/Issues Raised	Applicant's Response
		simultaneously landscape structure, ecological corridors, historic boundaries and elements affected by highway works. Heavy clay soil controls agricultural productivity, runoff, drainage and groundwater recharge. Piling is simultaneously a construction, noise, archaeological, groundwater and contamination issue. Lighting affects landscape, residential amenity, tranquillity, aviation and light-sensitive species. Those pathways require receptor-led reconciliation.	**Visual**, **ES Volume 1, Chapter 8 – Ecology and Biodiversity**, and **ES Volume 1, Chapter 10 - Cultural Heritage.** Baseline ground conditions are considered appropriately across **ES Volume 1, Chapter 9 – Water Resources, ES Chapter 15 – Soils and Agricultural Land**, and **ES Volume 1, Chapter 16 – Ground Conditions,** and suitable mitigation and control measures identified. The impacts of piling are considered across **ES Volume 1, Chapter 12 – Noise and Vibration, ES Volume 1, Chapter 10 - Cultural Heritage,** and **ES Volume 1, Chapter 16 – Ground Conditions.** A lighting strategy is provided within **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151]** which establishes the ecological, human, landscape and visual receptors which have the potential to be affected by new artificial lighting and establishes principles to reduce potential effects on key receptors. The lighting strategy has informed the assessment of lighting effects on ecological receptors within **ES Volume 1, Chapter 8 – Ecology and Biodiversity.** **ES Volume 1, Chapter 19 – In-Combination Effects Assessment** presents the potential likely in-combination effects between topics and assesses the interrelationship between individual development effects on the same receptor. The assessment identifies where receptors are subject to effects from more than one environmental topic and considers these during the construction, operation and decommissioning phases. The Applicant therefore considers that the Environmental Statement provides a comprehensive and proportionate assessment of interrelationships and receptor

ID	Theme	Comments/Issues Raised	Applicant's Response
			effects, consistent with the EIA Regulations and established EIA practice.
WR-BEPS-024	EIA Methodology Ecology and Biodiversity	The baseline also remains incomplete in matters capable of affecting design. Chapter 2 identifies unresolved or late evidence concerning white-clawed crayfish, the functional extent of barbastelle maternity-colony habitat, botany and aquatic ecology. Generic significance matrices and professional judgment cannot cure an incompletely defined receptor. The same problem arises from deferred mitigation. Protected-species surveys, licences, detailed lighting, drainage, foundation risk assessments, construction arrangements and other controls are repeatedly left to post-consent stages. Later information is legitimate where it refines an already demonstrated acceptable solution. It is materially different where the later work will determine whether an acceptable solution exists at all.	The Applicant refers to its response to BEPS under BEPS-110, BEPS-112, BEPS-119 within **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers, and Notable Parties [PDA-010]** regarding the adequacy of Chapter 2, the use of outline management plans, and the Rochdale Envelope approach. Furthermore, the Applicant refers to its response to BEPS-087 BEPS-215, BEPS-217 within **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers, and Notable Parties [PDA-010]** regarding ecological surveys.

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WR-BEPS-025	EIA Methodology Policy Compliance Ecology and Biodiversity Cultural Heritage	That concern has now been independently reflected in ExQ1 across multiple disciplines. The ExA asks why material matters concerning drainage and infiltration testing, soils, ground investigation, health mitigation, fire assessment, transport measures and design remain dependent upon later work while present conclusions of acceptability have already been reached. The new NPPF provides additional context: Policy P2 expects adequate site-assessment information to be available when ground-condition suitability is considered; F4–F8 require an adequate flood-risk and drainage basis; N2 requires sufficient information to demonstrate the natural-environment policy tests; and HE5 requires the decision-maker to be satisfied that the assessment accurately reflects effects on heritage significance.	The Applicant does not agree that conclusions of acceptability have been reached in advance of the necessary assessment. The Environmental Statement assesses the Scheme on a reasonable worst-case basis using maximum parameters secured through the **Draft DCO [REP1-014]** and associated documents. Where detailed design information is appropriately reserved for later approval, the relevant controls, management plans and DCO Requirements ensure that the final design remains within the parameters assessed and does not give rise to materially new or materially different environmental effects. The Applicant therefore considers that sufficient information has been provided to assess the likely significant effects of the Scheme and conclude on its environmental acceptability. The Applicant's response to ExQ1 can be found in **The Applicant' s Response to the Examining Authority's First Written Questions [REP1-083]**.
WR-BEPS-026	EIA Methodology	The recurring issue is therefore not that every detailed engineering decision must precede consent. It is whether post-consent	The Applicant refers to its response to WR-BEPS-025 above, and the responses provided to BEPS on this matter within **The Applicant's Response to Relevant Representations**

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		information merely refines an already assessed acceptable solution, or will determine whether such a solution exists at all. The consequence is that Chapters 6–18 cannot safely be treated as independent conclusions where they rely on inconsistent assumptions or unresolved inputs. Chapter 19 cannot repair an interaction which was omitted or understated in the chapter from which it should have originated.	**Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under BEPS-038, and BEPS-059.
WR-BEPS-027	The Order Limits Ecology and Biodiversity Scheme Description	Chapter 3 demonstrates that East Pye Solar is not proposed across generic agricultural land. The Order Limits encompass ten dispersed principal Sites, major electrical compounds, highway works and approximately 24 km of cable corridor within a landscape containing historic settlements, medieval churches, Listed farmsteads, PRoWs, ancient woodland, veteran trees, hedges, ponds, chalk-stream tributaries, private water supplies and productive agricultural land.	The Applicant notes this comment. In regard to the ecology related comments, the scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in **ES Volume 3, Appendices 8.1 – 8.9 [APP-152 – APP-160]**. An assessment of potential effects of the Scheme on habitats during construction, operation, and decommissioning is set out within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The scope of assessment has also been agreed through the scoping and consultation process, as described in **Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**.

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		The ecological evidence is particularly important. The Applicant's own bat evidence later establishes a nationally important assemblage. Ancient woodland, County Wildlife Sites, Roadside Nature Reserves and hydrologically sensitive habitats occur throughout or immediately beside the development area. Norfolk Wildlife Trust's evidence characterises the area as 'dense with nature'. These characteristics are not conveyed adequately by describing receptors principally by distance from separate numbered Sites.	
WR-BEPS-028	The Order Limits Scheme Description Landscape and Visual	The same is true of water. Ditches, field drains, tributaries, Principal Aquifers and private water supplies form connected source–pathway–receptor systems which cross the artificial boundaries between Sites and ES chapters. Historic landscape character is similarly carried by the relationship between fields, lanes, churches, farmsteads, greens and settlements rather than by designation polygons alone.	The Applicant notes the importance of connections between landscape and historical features. The Applicant is committed to retaining field boundaries and preserve existing landscape features 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]**.

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			Historical buildings and their settings are being considered as part of the scheme design, for example fields are left undeveloped around Grade I listed Church of St Michael south of Site 4 and Grade I listed Church of St Catherine South of Site 5. These are presented within the **Design Approach Document [APP-212]**. The Applicant recognises the importance of understanding the hydrogeological and hydrological regimes at the site, and where interconnectivity between these regimes may occur. The assessments presented in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** have been undertaken in accordance with the methodology agreed with the Environment Agency, with further assessment to be undertaken post-consent (including ground investigation and interpretative assessment, Foundation Works Risk Assessment etc.) as further agreed with the Environment agency and described in the **Outline CEMP [REP1-058]**. Hydrological connectivity between the Order Limits and identified water/ecological receptors is acknowledged within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**.
WR-BEPS-029	The Order Limits Site Selection and Alternatives	The significance of Chapter 3 is therefore one of site selection and avoidance. The density of constraints is itself evidence. The August 2026 NPPF now requires development proposals to consider the environmental qualities of the land itself, including	The Scheme has been subject to an environmentally-led design approach that ensures that all relevant and appropriate steps have been taken to achieve good design with the hierarchical mitigation approach adopted being to avoid where practicable, effects through the overall design and layout of the Scheme; reduce effects as far as practicable through the **Green Infrastructure Strategy [REP1-013]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		habitats, landscape character and countryside; to take account of agricultural land quality and grade; to connect to and strengthen ecological networks extending beyond the site; and to conserve established natural features where possible. Policy N2 further states that significant biodiversity harm should first be avoided through location on an alternative site with less harmful impacts before reliance is placed upon mitigation or compensation. A Scheme requiring repeated buffers, route changes, habitat corridors, crossing methodologies, further surveys, licences, planting, screening and management controls across its extent is not development inserted into an environmentally simple location. Those constraints should have informed the fundamental scale, location and configuration of the Scheme before mitigation became necessary.	The site selection process, as set out in the **Site Selection Assessment [APP-215]**, considered planning, environmental and operational factors, including consideration of BMV land, and avoidance of Flood Zones 2 and 3, nationally designated landscapes, designated international and national ecological and geological sites (including ancient woodland), and designated national and local archaeological and built heritage assets. The Scheme will deliver a minimum of 30% Biodiversity Net Gain in habitat units, 25% Biodiversity Net Gain in hedgerow units and 10% Biodiversity Net Gain in watercourse units, as secured through Requirement 9 of the **Draft DCO [REP1-014]**, with the **Biodiversity Net Gain Report [REP1-104]** demonstrating a potential net gain of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses. The design evolution of the Scheme is set out in the **Design Approach Document [APP-212]** and **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**. As described in Section 5.7 of **[APP-041]**, the iterative design process has been informed by environmental surveys, the environmental assessment process and consultation feedback, with the design progressing through three stages focused primarily on avoiding environmental constraints as far as practicable in accordance with the mitigation hierarchy.
WR-BEPS-030	Scheme Description	Chapter 4 demonstrates that material uncertainty remains over what will actually be constructed.	The Scheme has been assessed on the basis of a clearly defined maximum design parameters established and assessed through the Environmental Statement. These are

ID	Theme	Comments/Issues Raised	Applicant's Response
	Landscape and Visual	The DCO envelope permits up to three 132 kV Project Substations and three 400 kV Project Substations, a BESS, a new National Grid Substation, extensive 33–400 kV cabling and overhead-line works. At Site 1B, the Project Substation evolved from the approximately 7 m-high 132 kV installation presented during consultation, to a 400 kV installation initially described at approximately 13 m, and finally to an application envelope permitting a compound of up to 1.1 ha and structures reaching 15 m. The grid works may include up to four new pylons reaching approximately 61 m. Those are material physical changes, not minor equipment refinements. They affect landscape, heritage, aviation, noise, drainage, groundwater, construction and abnormal-load requirements. Yet several associated maximum parameters remain unresolved or insufficiently reconciled across the ES.	provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]** and include all components of the Scheme. Where flexibility remains within the envelope, the assessment has considered the reasonable worst-case scenario in accordance with established EIA practice. Matters such as landscape and visual effects, heritage impacts, aviation considerations, noise, drainage, groundwater, construction effects and abnormal loads have been assessed against the parameters presented in the DCO application, ensuring that potential effects are not understated.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-031	Scheme Description	The BESS is also not fixed by an equivalent confirmed connection status, capacity-duration relationship or long-term technology. The DCO must therefore be tested against solar-only operation, delayed BESS, reduced BESS and future replacement technologies rather than only against the promoted integrated case.	The Applicant refers to its response to WR-BEPS-016.
WR-BEPS-032	Scheme Description Point of Connection	Most importantly, the Site 1B National Grid solution is not confirmed by NGET. The final size, design and location remain affected by wider connection reform and potentially by other projects. NGET does not expect the revised connection agreement to require East Pye Solar to secure the land or consent and expressly states that consent would not oblige it to use the proposed substation. The emergence of North Anglia Node A on the proposed Norwich–Tilbury transmission reinforcement further strengthens the need to test whether separate permanent transmission infrastructure at	The Applicant refers to its response to WR_BEPS-005.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Great Moulton remains strategically justified.	
WR-BEPS-033	Scheme Description	The ExA has also required the Applicant to explain the National Grid substation's capacity to accommodate other projects, the certainty and timing of its delivery as East Pye's point of connection and how that timing would be secured, together with any cumulative or downstream consequences of future third-party use. The proposed substation therefore cannot yet be treated merely as a fixed East Pye component whose wider network consequences are already exhausted by the present ES. Whole-life uncertainty is substantial. The Scheme permits complete panel replacement over a period of up to 24 months, up to five BESS replacement cycles, major transformer and electrical replacement, and a 60-year operating period. Some infrastructure, including the National Grid Substation and grid connection works, is intended or	The National Grid Substation and grid connection works have been assessed as part of the Scheme, with relevant cumulative effects considered through the **ES [APP-042 to APP-054]**. The approach to cumulative effects is set out in **ES Volume 1, Chapter 2 – EIA Methodology [APP-038]**, with a summary of cumulative effects provided in Table 20.4 of **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]**. Future third-party projects that may connect into the substation would be subject to their own consents and assessments. As confirmed by the Applicant in its **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**, should future projects connect into the National Grid Substation, the cumulative effects with East Pye Solar would need to be assessed as part of those future DCO applications. The Scheme has been assessed on a reasonable worst-case with the final design required to remain within those parameters so that its effects are no worse than those assessed. Operational maintenance and replacement activities have also been assessed, including replacement of Solar PV Panels and BESS equipment, with operational environmental measures controlled through the **Outline OEMP [REP1-60]**. The detailed OEMP is secured through **Requirement 14 of the Draft DCO [REP1-014]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		capable of remaining beyond solar decommissioning.	
WR-BEPS-034	Construction and Decommissioning	The Applicant's recent Examination material also changes the decommissioning position. It now states that private landowner agreements contain decommissioning securities intended to protect against default or insolvency and capable of periodic revaluation or top-up. The unresolved issue is whether a series of private, landowner-specific securities can secure the coordinated decommissioning and restoration of East Pye as one NSIP. It remains unclear who would organise Scheme-wide removal and restoration if the undertaker failed; whether every landholding benefits from equivalent protection; whether the securities cover soil, drainage and contamination remediation as well as equipment removal; whether they remain adequate where restoration costs materially exceed present estimates; and whether the public authority enforcing the DCO can access them. The	In terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 21 of the **Draft DCO [REP1-014]**. Sections 160 and 161 of the Planning Act 2008 make it an offence to carry out development for which development consent is required without a DCO, or to breach the terms of a DCO. This includes breach of the obligations in a management plan secured via the DCO. Part 8 of the Planning Act 2008 provides the relevant planning authority with powers of entry (with and without a warrant) and powers to require information is provided to it in respect of a potential breach of sections 160 or 161. Failure to comply with an information notice is an offence. Where a breach is identified, the relevant planning authority may serve a notice under section 169 requiring the removal of unauthorised development, or that steps are taken to resolve a breach of the terms of the DCO. In the event this notice is not complied with, the relevant planning authority may enter the land and remove the development, or carry out the steps required, itself under section 170. The relevant planning authority may then recover its expenses in carrying out the works required by the notice under section 170(1)(b), "from the person who is then the owner of the land". Section 170(2) then provides a

ID	Theme	Comments/Issues Raised	Applicant's Response
		Applicant should also clarify reported development-uplift or overage provisions in land agreements. Such provisions would not determine future planning use, but if they contemplate a non-agricultural future for the land, they must be reconciled with the DCO and ES case that the Scheme is temporary and that land not required permanently will be restored to agricultural use. The present arrangements therefore do not yet demonstrate a coherent, insolvency-resilient and enforceable whole-Scheme restoration mechanism.	mechanism for the landowner to recover those costs in turn from the party responsible for the breach of section 160 and/or section 161 (s170(2)). In respect of the decommissioning of the Scheme specifically, in the event the Applicant became insolvent or was otherwise not able to comply with Requirement 21, this would constitute a breach of the terms of the DCO, and therefore an offence under section 161 of the Planning Act 2008. The enforcement process would then be followed, with the relevant planning authority issuing a notice under section 169 requiring steps be taken to decommission the Scheme. The landowner could choose to comply with the notice and recover its costs from the Applicant under s170(2) or, if the Applicant was insolvent, via the security put in place under the terms of the lease. If this notice were not complied with, the relevant planning authority would then arrange for decommissioning to be carried out under section 170. The relevant planning authority would then exercise its statutory right to recover its full costs from the landowner under section 170(1)(b). In circumstance where the Applicant was insolvent, the landowner would recover the costs under the security put in place pursuant to the terms of the lease, with the same effect as if the landowner had recovered the costs from the Applicant directly under section 170(2). In circumstances where the relevant planning authority has a statutory right to recover its costs from the landowner, it is appropriate that decommissioning security is provided by the Applicant directly to the landowners. If the security was for the benefit of the relevant planning authority, a landowner could

ID	Theme	Comments/Issues Raised	Applicant's Response
			find themselves liable under the Planning Act 2008 for decommissioning costs and unable to make a claim as they are not the beneficiary of the security. The Applicant is therefore confident that provision of decommissioning security directly to landowners is the appropriate mechanism for protecting all parties, including the relevant planning authority and landowners, from a breach of the DCO by the Applicant.
WR-BEPS-035	EIA Methodology	The Rochdale Envelope cannot cure uncertainty over either the essential identity of the project or the environmental consequences of the range authorised. It can accommodate genuine detailed-design flexibility only where the range of permissible outcomes has been defined and adequately assessed.	The Applicant refers to its response to BEPS under BEPS-058. BEPS-059, and BEPS-115 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-036	Scheme Description	ISH1 confirmed that material choices remain open, including AIS/GIS technology for the project substations, the detailed positioning and number of conversion units and switchrooms, ancillary operational buildings and substantial aspects of final layout. The Applicant nevertheless maintains that any final design within its parameters would	The Applicant refers to its response under WR-BEPS-021.

ID	Theme	Comments/Issues Raised	Applicant's Response
		necessarily result in effects no worse than those reported in the ES.	
WR-BEPS-037	Need for the Scheme	ISH1 identified further uncertainty concerning the scale of the generating development itself. The ExA required the Applicant to explain the proposed overplanting ratio and panel ratings, provide hectares-per-MW comparisons, clarify why panel type and location cannot yet be fixed, identify minimum panel separation distances and explain whether the absence of an express maximum generating-capacity cap could permit a materially greater installed capacity within the authorised envelope. The Applicant was also required to explain why East Pye relies upon a minimum 50 m residential stand-off where the Applicant's related Droves Solar Farm uses 250 m. These questions go directly to whether the DCO defines the development sufficiently to demonstrate that the ES has assessed the full authorised range.	In relation to overplanting and land use calculations, the Applicant refers Block East Pye Solar to its responses to Action Points 21 and 22 of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-038	Scheme Description	ExQ1 now independently tests that proposition, including whether stronger parameters are required and whether numerous Requirements should require development to be **in accordance with**, rather than merely **substantially in accordance with**, approved control documents. BEPS therefore seeks a consolidated Environmental Envelope and DCO Security Schedule identifying, for each materially flexible component, the permitted alternatives, maximum number and spatial envelope, discipline-specific reasonable worst case, ES assessment relied upon and DCO provision which prevents a worse outcome.	The Applicant refers to its response to ExQ1.9.1 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]**.
WR-BEPS-039	Scheme Description	The ExA has also required the Applicant to correct inconsistencies between the Indicative Masterplan and the Works Plans, including areas variously shown as retained agricultural land, mitigation land, biodiversity land and cabling works, demonstrating that some of the spatial relationships relied	The Applicant refers Block East Pye Solar to its responses to Action Points 30 of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		upon in the ES and mitigation case are not yet internally reconciled. The mapping generally must be updated throughout the application so that it is all showing the most up-to-date landscape including the Long Stratton Bypass. The cable corridor CRC4 currently runs right through newly developed biodiversity mitigation land for the new Bypass, including newly planted woodland blocks and multiple wildlife ponds. This cannot be seen on the Works Plan because it is using an out-dated base map. None of this land has been surveyed.	
WR-BEPS-040	Site Selection and Alternatives	Chapter 5 has become more important following ISH1 because the Applicant's oral evidence clarified the chronology of site selection. The Applicant confirmed that Norwich Main initially provided the geographical basis for the search and that the solar-site exercise proceeded in parallel with continuing discussions about connection availability. Crucially,	The Applicant has previously addressed substantially similar issues in The Applicant's **Written Summary of Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098],** in **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers and Non-Statutory Parties [PDA-010]** under comment IDs BEPS-022, BEPS-163, BEPS-164, BEPS-167, BEPS-168 and BEPSG-003, and in **The Applicant's Response to Procedural Deadline A and Additional Submissions [REP1-103]** under comment IDs BEPS-PDA-003, BEPS-PDA-004, and BEPS-PDA-012.

ID	Theme	Comments/Issues Raised	Applicant's Response
		when Norwich Main ceased to be the viable connection strategy, **four of the six stages of the Applicant's site-selection exercise had already been completed**. The Applicant did not then restart the exercise through a fresh unconstrained search centred on Great Moulton. Its case is that the previously identified land remained within approximately 20 km of Great Moulton and that the same Sites would ultimately have emerged. That admission sharpens rather than resolves the alternatives issue. Continued inclusion inside a 20 km radius establishes geographical eligibility under the Applicant's methodology; it does not demonstrate comparative environmental suitability. A Great Moulton-centred exercise potentially changes the relative distance of candidate land from the connection point, cable requirements, number and voltage of collection substations, construction access, BMV impacts, landscape and heritage	

ID	Theme	Comments/Issues Raised	Applicant's Response
		effects, ecology, hydrology and proximity to settlements.	
WR-BEPS-041	Site Selection and Alternatives	The documentary basis for that chronology remains to be completed. The ExA has required the Applicant at Deadline 1 to provide the early desktop planning review, clarify when landowner engagement began and how landowner agreement fed into site selection, respond on the treatment of Countryside Stewardship land and explain the options taken forward at PEIR stage. Those documents will be important in testing the Applicant's assertion that environmental screening, rather than land availability or the inherited Norwich Main geography, ultimately drove the selected configuration.	The Applicant has provided a response to the Action Points arising from Issue Specific Hearing 1 in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]** relating to site selection chronology, landowner engagement, Countryside Stewardship land and the options taken forward at PEIR stage. The Applicant has provided the 'Desktop Planning Assessment' Report at Appendix A within that response document.
WR-BEPS-042	Site Selection and Alternatives	The issue is particularly material because the Applicant also confirmed during ISH1 that the number and distribution of project substations and interconnecting electrical infrastructure are driven in part by the geographical spread of the Scheme. The environmental burden of those substations,	The Applicant refers to the responses provided in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]** at agenda item 3(d).

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		cables, compounds, tracks and accesses is therefore not simply an unavoidable consequence of generating approximately 500 MW: it is partly a consequence of the particular dispersed configuration selected.	
WR-BEPS-043	Site Selection and Alternatives	ExQ1 has now formalised the same issue by requiring the Applicant to explain why a fresh site-selection exercise centred on Great Moulton would not have produced a materially different Scheme, extent or configuration, and to explain the relative influence of environmental suitability, engineering/grid considerations, willing-landowner availability and other deliverability considerations.	The Applicant refers to its responses to Q1.3.1 and Q1.3.2 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** detailing why the change in point of connection location from Norwich to Great Moulton did not require repeating the site selection exercise, and the relative influence environmental constraints, grid requirements and landowner availability had on site selection, respectively. Additionally, Agenda Item 2(a) of the **Written Summary of the Applicant's Oral Submission and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-098]** explains the six-stage selection process and why the selected sites remained suitable after the point of connection moved. Further, response BEPS-163 in **The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** addresses the importance of willing landowner availability on site selection.

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WR-BEPS-044	Site Selection and Alternatives	The August 2026 NPPF adds material policy context. N2 requires the quality and grade of agricultural land to be considered and, where significant agricultural development is necessary, poorer-quality land to be used where possible. It also requires significant biodiversity harm first to be avoided through location on an alternative site with less harmful impacts. The question is therefore not whether willing-landowner availability was an illegitimate consideration. It was a legitimate deliverability consideration. The question is whether it prematurely narrowed the reasonable environmental alternatives, and whether constraints capable of excluding alternative land were applied with equivalent force once land was inside the preferred Scheme. That question cannot be completed at Deadline 1. BEPS will review the Local Impact Reports, statutory-consultee Written Representations,	The Applicant draws attention to the fact that the National Policy Statements are the primary decision-making framework for the Scheme. As set out in response to BEPS-400 in **[PDA-010]**, NPS EN-3 recognises that, at scale, ground mounted solar developments may use some agricultural land. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**, the **Site Selection Assessment [APP-215]**, the **Design Approach Document [APP-212]** and the **Planning Statement [REP1-074]** demonstrate compliance with the relevant provisions of NPS EN-3 (paragraphs 2.10.20 to 2.10.26 and 2.10.137), including the preference for poorer quality agricultural land where agricultural land is necessary and the expectation that BMV land should be avoided where possible. The Applicant refers to its responses to Q1.3.2 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** detailing the relative influence environmental constraints, grid requirements and landowner availability had on site selection, respectively.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Statements of Common Ground and further impact evidence and expects to raise further questions concerning site selection where that material shows that environmental constraints characterised by the Applicant as mitigable are in fact unresolved, more severe than assumed or capable of requiring avoidance.	
WR-BEPS-045	Climate Change	The principal claimed benefit of East Pye is climate mitigation. That benefit must therefore be capable of independent verification. On the figures reproduced and tested in BEPS Chapter 6, it is not. The Applicant's headline greenhouse-gas calculations are internally inconsistent, contain material arithmetic or unit discrepancies, omit relevant emissions and rely upon a lifetime counterfactual which assumes that the electricity displaced by East Pye Solar retains the carbon intensity of the 2031 grid for the following 60 years.	The Applicant refers to its response under WR-BEPS-047 and WR-BEPS-048. The Applicant provides a response (see below) to rectify arithmetic or unit discrepancies within **ES Volume 1, Chapter 6 – Climate Change [APP-042]**. The Applicant does not agree that the existence of identified calculation errors invalidates the assessment methodology or the overall conclusions of the assessment. 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 (60 years). 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.

ID	Theme	Comments/Issues Raised	Applicant's Response
			Thus, the Applicant's assessment provides a comparison against the projected grid at the point at which the Scheme becomes operational. The assessment has been undertaken in accordance with ISEP guidance and considers the Scheme's contribution to net zero objectives, carbon budgets and decarbonisation of the electricity sector. The significance conclusion is not based solely upon a single carbon saving figure but on the wider context of the Scheme's role in providing low-carbon electricity generation consistent with national policy objectives.
WR-BEPS-046	Climate Change	The first problem is basic reconciliation. The Applicant gives construction emissions of 347,673 tCO_2e, operational emissions of 1,104,918 tCO_2e and decommissioning emissions of 6,390 tCO_2e. Those figures total 1,458,981 tCO_2e. Against the Applicant's stated lifetime generation of 36.33 TWh, that equates to approximately 40.16 gCO_2e/kWh. The Applicant, however, reports a lifecycle intensity of 39.67 gCO_2e/kWh. The operational emissions alone equate to approximately 30.41 gCO_2e/kWh, not the 29.74	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. • 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)

ID	Theme	Comments/Issues Raised	Applicant's Response
		gCO_2e/kWh reported. The principal intensity figures therefore cannot be reproduced from the Applicant's own stated emissions and generation totals. The discrepancy becomes more serious in the claimed lifetime carbon saving. The Applicant applies a comparator of 65 gCO_2e/kWh to 36.33 TWh of lifetime generation. On those inputs, gross avoided emissions are: 36.33 billion kWh × 65 gCO_2e/kWh = 2,361,450 tCO_2e. Deducting the Applicant's stated whole-life emissions of 1,458,981 tCO_2e leaves a net saving of only 902,469 tCO_2e. The Applicant nevertheless reports a lifetime saving of 1,294,630 tCO_2e. The difference is approximately 392,000 tCO_2e. Even if only the stated operational emissions of 1,104,918 tCO_2e were deducted—which would itself be an incomplete whole-life calculation—the result would be 1,256,532	• 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.

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		tCO_2e, still approximately 38,000 tCO_2e below the Applicant's reported figure. BEPS has therefore been unable to identify a reproducible route from the Applicant's own headline inputs to its claimed principal climate benefit.	
WR-BEPS-047	Climate Change	The underlying component calculations contain further discrepancies. The Applicant records **26,393 tonnes of glass** with an emissions factor of **1.4028 $kgCO_2e/kg$**, but reports only **1,371 tCO_2e**. Direct multiplication gives approximately **37,024 tCO_2e**. It records **9,973 mounting structures**, each weighing **800 kg**, with an emissions factor of **2.71 $kgCO_2e/kg$**, but reports **37,845 tCO_2e**; direct multiplication gives approximately **21,621 tCO_2e**. BEPS also identifies an apparent transposition in construction-worker journey distances, giving approximately **2,479 tCO_2e** when recalculated rather than the reported **2,192 tCO_2e**.	The Applicant refers to its response to WR-BEPS-045. The Applicant acknowledges the arithmetic error identified **in ES Volume 1, Chapter 6 – Climate Change [APP-042]** Section 6.9.16 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: • The total glass weight of all panels has been estimated as 26,393 tonnes. An embodied carbon value of 1.4028 $kgCO_2e/kg$ 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

ID	Theme	Comments/Issues Raised	Applicant's Response
			36x2 panel tables require an additional factors 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 Chapter.
WR-BEPS-048	Climate Change	Other inputs are internally implausible or insufficiently explained. Chapter 6 records approximately **5,632 km of electrical cable** with a combined mass of only **569 tonnes**, while elsewhere giving principal cable material weights of **21 kg/m for copper and 10.7 kg/m for aluminium**. Those figures cannot all describe the same cable inventory without further explanation. The BESS calculation also refers to '80% degradation per year', which, read literally, is not credible and appears to	The Applicant identifies in **ES Volume 1, Chapter 6 – Climate Change [APP-042]** Section 6.9.31 that 5,632 km is an indicative electrical cable length value with an estimated weight of 569 tonnes for the Grid Connection Cables, on-site cables, and interconnecting cables for the whole Scheme. The Applicant acknowledges Section 6.9.32 contains a unit discrepancy. As such it should read: • Total weight per kilometre was provided by project Waste consultants, Lanpro, for the two main materials based on cables used for similar schemes. These are copper (21 kg/km) and aluminium (10.7 kg/km). The remaining weight is assumed to be polyethylene. As the value presented in Section 6.9.34 is correctly reported as tCO_2e, the grammatical and unit error in Section 6.9.32

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		confuse annual degradation with retained capacity. These are not immaterial typographical issues where they occur within the calculation used to establish the Scheme's principal environmental benefit.	have no bearing on the reported total embodied carbon from all electrical cables used by the Scheme. Thus, Section 6.9.34 remains valid and unchanged. The Applicant acknowledges the BESS degradation language used in **ES Volume 1, Chapter 6 – Climate Change [APP-042]** Section 6.9.89 has caused confusion and does not clearly convey the intended assumption. The assessment does not assume battery degradation of 80% per year. Rather, the assessment is based upon an assumed battery performance profile over the operational life of the facility, as described within ES Chapter 6. The Applicant does not consider that these matters materially affect the conclusions of the greenhouse gas assessment.
WR-BEPS-049	Climate Change	There is then a separate methodological problem. The Applicant acknowledges that grid carbon intensity is expected to fall rapidly but applies the **2031 factor of 65 gCO_2e/kWh across the entire 60-year generation period**. Electricity generated in 2050, 2070 or 2090 is therefore treated as though it displaces electricity with the carbon intensity of the 2031 grid. BEPS's sensitivity testing, using the methodology relied on by campaigners at the Great North Road NSIP examination,	The Applicant acknowledges the alternative calculation presented by BEPS, which uses the methodology relied on by objectors at the Great North Road NSIP examination and applies the DESNZ projected grid carbon intensity pathway on a year-by-year basis over the operational lifetime of the Scheme (60 years). This provides a useful sensitivity illustrating the effect of an assumed future decarbonisation trajectory for the UK electricity grid. 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		demonstrates how decisive that assumption is: using the Applicant's stated generation and emissions but allowing the grid factor to decline to 20 gCO_2e/kWh by 2050 produces an illustrative net adverse balance of approximately **447,000 tCO_2e**; a decline to 10 gCO_2e/kWh produces an illustrative adverse balance of approximately **747,000 tCO_2e**. Those sensitivity results are not advanced as the only correct forecasts. Their significance is that the Applicant's claimed beneficial outcome is highly dependent upon freezing the grid counterfactual at the opening-year value.	Scheme can be considered, without making the assessment dependent upon a particular long-term projection of the future electricity generation mix. The two approaches therefore address the comparison on different bases. The BEPS calculation 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 results of the alternative calculation but does not consider that they invalidate the approach adopted within the ES or alter the lifecycle GHG emissions associated with the Scheme through this methodological approach.
WR-BEPS-050	Climate Change	The sensitivity analysis demonstrates that the sign and magnitude of the claimed whole-life climate benefit are highly dependent upon the assumed future grid counterfactual. On the illustrative declining-grid scenarios tested by BEPS, the calculated balance becomes adverse. That does not establish that those particular scenarios are the correct	The Applicant refers to its response to WR-BEPS-045 and WR-BEPS-049. 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.

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		forecast, but it demonstrates that the Applicant's claimed lifetime benefit cannot safely be treated as robust without a transparent declining-grid sensitivity analysis.	
WR-BEPS-051	Climate Change	The Applicant's assessment is incomplete in other material respects. The BESS dominates the stated lifecycle emissions and is assumed to undergo repeated replacement, yet its future chemistry, charging source, cycling regime and parasitic cooling demand are not fixed. Full panel replacement, up to five BESS replacements and transformer replacement are included without a transparent activity and logistics schedule for each replacement cycle. Land-use change and soil carbon are not properly quantified despite EN-1 requiring whole-life GHG assessment to include land-use effects. Extensive ancillary infrastructure and operational loads are omitted on assumptions of individual immateriality without demonstrating that the aggregate exclusions remain below the	The Applicant refers to its response to WR-BEPS-045, WR-BEPS-047, WR-BEPS-048, and WR-BEPS-049. The Applicant notes the concerns raised regarding the scope of the greenhouse gas assessment but does not agree that the greenhouse gas assessment is materially incomplete. With regard to battery replacement assumptions, the Applicant acknowledges in **ES Volume 1, Chapter 6 – Climate Change [APP-042]** Section 6.9.75 that the 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. The **Outline OTMP [APP-202]** provides a framework for the management of vehicle movements to and from the Scheme

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		stated threshold. The water assessment identifies 16,871 m³ of construction water and 309,196 m³ of operational water, but the climate calculation does not include the foreseeable transport emissions if an off-site tankered supply is required. These defects are material because climate benefit is one of the principal matters relied upon to outweigh East Pye Solar's admitted environmental harms. The Examination should not assign substantial positive weight to a carbon saving which cannot be reproduced from the Applicant's own figures. At minimum, the Applicant must disclose the complete calculation workbook, formulas, source data and quality-assurance record; reconcile every headline total; correct the identified arithmetic and unit discrepancies; undertake year-by-year declining-grid sensitivity analysis; and recalculate whole-life emissions including land-use change, replacement, parasitic demand,	during periods of scheduled replacement, repair activities and maintenance activities associated with the Scheme to be carried out during the operational phase. Section 4 of the Outline OTMP provides a forecast of vehicle trips associated with panel and BESS replacement, noting that these will be refined and updated in the detailed OTMP prior to replacement activities taking place. The Applicant notes the comment regarding potential emissions associated with tankered water supply. The greenhouse gas assessment was undertaken using the construction and operational traffic assumptions available at the time of assessment. The Applicant notes that tankering movements are considered to be inherent within the trip generation and distribution forecasts as detailed and assessed within ES Volume 1 Chapter 11: Transport and Access [APP-047]. Tankering movements are therefore subject to the management and mitigation measures detailed within the **Outline CTMP [REP1-068]** and **Outline OTMP [APP-202]** to be secured by Requirement of the **Draft DCO [REP1-018]**.

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		excluded infrastructure, water supply and realistic curtailment.	
WR-BEPS-052	Climate Change	The August 2026 NPPF does not reduce the importance of demonstrating the actual magnitude of the claimed climate benefit. Policy W3 provides for substantial weight to relevant energy-security, economic-development and net-zero benefits. That makes accurate quantification more, rather than less, important where climate benefit is advanced as a major counterweight to admitted environmental harm. BEPS does not ask the ExA to discount the generic climate benefit of renewable generation. It asks that the particular weight attached to East Pye's quantified whole-life carbon benefit should correspond to the robustness of the Scheme-specific calculation from which that claim is derived. **Until that exercise is completed, the Applicant has not established the magnitude– or even the robustness of the**	The Applicant refers to CLI-008 and CLI-009 of **The Applicant's Response to Relevant Representations Part 5 - By Theme [PDA-012]**.

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		direction – of the whole-life climate benefit relied upon in the planning balance. Where the principal claimed benefit cannot be reconciled mathematically from the Applicant's own stated inputs, it cannot safely be treated as a counterweight to the substantial and demonstrable harms identified elsewhere in the Environmental Statement and in this Written Representation.	
WR-BEPS-053	Landscape and Visual	Landscape harm is not hypothetical; it is admitted by the Applicant. The LVIA identifies Major Significant construction effects at, among other receptors, Site 1, the BESS, Site 7, Site 8 and important Landscape Character Areas. At Site 1 the Applicant identifies Major Significant effects during construction, at Year 1 and still at Year 15. It expressly describes a 'total change' to key landscape characteristics. The BESS remains Moderate Significant at Year 15; Sites 7 and 8 and B1 Tas Tributary Farmland and E2 Great Moulton	NPS EN-1 states at para 5.10.5 that 'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape', and at para 5.10.13 that 'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'. The Applicant acknowledges that the Scheme would introduce changes to the landscape and visual amenity, and that significant effects are identified and would remain at Year 15. These are reported transparently in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].** The Applicant has however 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

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		Plateau Farmland also retain significant effects.	support landscape integration and visual screening of the Scheme. 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].** Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A **Green Infrastructure Strategy [REP1-013]** has also 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 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].**

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WR-BEPS-054	Landscape and Visual	Individual receptors confirm the severity. • Views south-east of Great Moulton remain Major to Substantial and Significant at Year 1. • Significant effects remain from Great Moulton and surrounding PRoWs at Year 15 because the National Grid and Project Substations continue to influence the view. • At 22 Hillcrest Court, upper-floor effects are Major to Substantial Adverse and Significant at Year 1 and remain Moderate Adverse and Significant at Year 15. • Oakdene Cottage experiences a Major Adverse and Significant first-floor effect at Year 1.	The Applicant notes the effects on visual receptors highlighted by the respondent. In addition to the response at WR-BEPS-053, the applicant has provided the following mitigation measures for the receptors identified, detailed in the **Green Infrastructure Strategy [REP1-013]** and **Design Approach Document [APP-212].** • Great Moulton (VL3/Site 1): Proposed linear tree planting along the northern perimeter of Site 1B would reinforce the existing hedgerow and increase the density of vegetation along this boundary. Once established, the planting would provide a denser and more continuous landscape feature, increasing the effectiveness of visual screening and reducing views towards the Scheme during both in-leaf and out-of-leaf conditions. • Significant effect remains the PRoW within Site 1. Mitigation includes offsets from the PRoW network and introduction of hedgerow with trees along the PRoW network. This will help filter views of the infrastructure from these routes. • 22 Hillcrest Court: Broadleaf woodland planting along the eastern boundary of Sub-Site 2A would reinforce the existing hedgerow / tree belt and increase the density of vegetation along this boundary. Once established, the planting would provide a more continuous landscape feature, increasing the effectiveness of visual screening and reducing views towards the Scheme during both in-leaf and out-of-leaf conditions.

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			• Oakdene cottage: A ~100m offset to the property is provided around Oakdene Cottage and broadleaf woodland planting along the eastern boundary of Sub-Site 7L is proposed. This would reinforce the existing hedgerow / tree belt around the property and increase the density of vegetation. Once established, the planting would increase the effectiveness of visual screening and reduce views towards the Scheme during both in-leaf and out-of-leaf conditions.
WR-BEPS-055	Landscape and Visual	The development consists of moving tracker arrays up to 4.5 m high, together with substations, BESS, fencing, CCTV, tracks and transmission infrastructure. Chapter 7 itself acknowledges the transformation from agricultural land to an 'energy production landscape'.	The Applicant agrees that the Scheme would introduce a new form of land use and that **Chapter 7 Landscape and Visual [APP-043]** describes the operational landscape as an "energy production landscape". However, this does not mean that the existing agricultural character would be wholly lost.
WR-BEPS-056	Landscape and Visual	The mitigation case does not remove that conflict. In the Great Moulton Plateau, openness and expansive sky are defining landscape characteristics. New woodland may conceal industrial infrastructure, but it does so by removing the openness which defines the landscape. At several receptors the Applicant itself identifies continuing effects	The Applicant agree that there will be some effect on the open rural outlook at some receptors. Where the proposed mitigation will have an effect on the openness of the landscape, these are assessed and reported transparently within **Chapter 7 Landscape and Visual [APP-043].** However, the baseline demonstrates that the landscape within which the Scheme is located contains a varied pattern and structure with fields, hedgerows, hedgerow trees, tree belts and woodland blocks component features. These features create local enclosure and framed or wooded views. Therefore, the landscape mitigation could reasonably be

ID	Theme	Comments/Issues Raised	Applicant's Response
		because mitigation planting changes the character of open views. Screening and preservation are therefore not equivalent.	considered to reinforce landscape elements that are already present within the receiving landscape, albeit with their influence varying locally.
WR-BEPS-057	Landscape and Visual	That distinction is reinforced by the August 2026 NPPF. DP3 requires development to respond to the history, character and features of its site and setting and to maintain or establish a strong sense of place; DP4 requires design quality to be considered throughout project evolution and delivery. P3 expressly protects the character of tranquil areas and requires adverse artificial-light effects on intrinsically dark landscapes and nature to be limited. TR8 requires PRoWs to be protected and enhanced and expressly recognises the value of direct and circular walking, cycling and bridleway routes.	In relation to DP3 and DP4, the Scheme has been developed through an iterative, landscape-led design process that has taken account of landscape character, visual amenity, heritage, ecology and public access constraints. The **Design Approach Document [APP-212]** states that the design has evolved in response to environmental assessments and consultation feedback, including reductions in solar array extent, increased setbacks, landscape planting and mitigation areas intended to respond to local context and minimise adverse effects. With regard to P3 and TR8 the Applicant considers that **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** recognises the landscape as a complex and interconnected environment comprising physical, cultural, historic and perceptual characteristics. As described in the baseline and landscape character assessment, consideration has been given to landscape character, settlement pattern, heritage features, public rights of way, vegetation structure, tranquillity and other characteristics that contribute to the experience and perception of the receiving landscape. Furthermore**, Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** sets out the approach to lighting for the Scheme, including embedded design measures to minimise light spill and glare. Construction lighting will be limited to areas where specific tasks are being undertaken, with luminaires

ID	Theme	Comments/Issues Raised	Applicant's Response
			orientated towards the task area and away from the night sky. Operational lighting will remain off throughout the night unless the Site is occupied and lighting is required. All luminaires will be directed downwards and will have a negligible or zero upward light ratio to minimise upward light and the potential for sky glow. In addition for Public Rights of Way, the Applicant has expressly considered the PRoW network, including the Boudicca Way and Via Beata recreational routes, within both the design process and the **Landscape and Visual Impact Assessment [APP-043].** Further, a visual amenity assessment of **Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149]**.
WR-BEPS-058	Landscape and Visual	Those provisions are particularly relevant following ISH1 and ExQ1. The Applicant could not identify a fixed number or precise location for potentially substantial conversion units/switchrooms and confirmed that important layout details remain for detailed design. The ExA has also questioned the effective 100 m threshold used for detailed residential visual-amenity assessment and has requested consideration of the sequential experience of people using networks of PRoWs rather than treating each path or viewpoint in isolation. The landscape	The Applicant refers to its response to Q1.11.1 and Q1.11.4 in the **Applicant response to ExA Examination First Written Questions [REP1-083]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		assessment must therefore address the development that can actually be authorised, the route experience as a whole and the landscape effects of the screening itself—not merely whether infrastructure can eventually be hidden from individual viewpoints.	
WR-BEPS-059	Lighting	The night-time assessment is also incomplete. The Lighting Strategy confirms operational lighting at major compounds and column-mounted lighting around the BESS, yet Chapter 7 contains no substantive assessment of the significance of night-time landscape effects despite the Inspectorate having required consideration of intermittent and motion-activated lighting.	Lighting have been considered through the development of **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151].** Operational lighting will remain switched off by default and will only be activated when the Site is occupied, which is anticipated to occur infrequently and primarily in emergency situations. Lighting will be controlled by motion sensors focused on the Site entrances and areas immediately adjacent to the Site boundaries, with sensors appropriately calibrated to minimise unnecessary activation by minor heat signatures. Given the limited extent, infrequent use and controlled nature of the proposed lighting, significant effects on night-time landscape character are not considered likely. Therefore operational lighting is not considered to require further assessment.
WR-BEPS-060	Landscape and Visual	The photomontage evidence requires similar caution where summer foliage provides maximum screening. That is particularly important around	The extent of the development envelope in context with Grade 1 St Catherine's Church is shown on VL6 / Site 5 in the winter view in ES **Volume 3, Appendix 7.6 - Figure 7.6.6 Visualisations – Site 5 [APP-142].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Grade I St Catherine's Church at Fritton. The existence of a separate winter baseline photograph does not show how the development itself appears in leaf-off conditions.	The methodology for visualisation production is set out in **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**. The visualisations have been prepared in accordance with industry-standard guidance, specifically the Landscape Institute [2019] Visual Representation of Development Proposals Technical Guidance Note 06/19 [TGN 06/19]. The types of visualisations produced include, Photowires, Photomontages / Photowires for Winter Year 1 with no landscape measures shown, and Photomontages Summer Year 15 with established landscape measures shown.
WR-BEPS-061	Landscape and Visual	Independent professional LVIAs commissioned on behalf of the South Norfolk community will be submitted by Hempnall Parish Council and Shotesham Parish Council and together cover the complete Scheme. BEPS supports their conclusions. They are deliberately not duplicated within this Written Representation. The Chapter 7 evidence therefore establishes a substantial and enduring adverse effect which exists even before the wider methodological objections are applied.	The Applicant notes that separate independent LVIAs are to be submitted on behalf of Hempnall Parish Council and Shotesham Parish Council and will consider these submissions. The Applicant does not agree with the assertion that **Chapter 7 [APP-043]** itself establishes a "substantial and enduring adverse effect". Chapter 7 identifies significant adverse effects for a number of landscape and visual receptors, including effects that remain significant at Year 15. These effects are clearly reported and have been taken into account in the overall assessment of the Scheme. The identification of significant adverse effects for individual receptors should not be interpreted as demonstrating a substantial and enduring adverse effect across the Scheme as a whole.
WR-BEPS-062	Ecology and Biodiversity	The ecological case is materially more serious than a conventional	The Applicant refers to its responses to Brooke Parish Council under BPC-006 and BPC015, to Hempnall Parish Council

ID	Theme	Comments/Issues Raised	Applicant's Response
		solar-farm habitat assessment. The Applicant's own Bat Activity Survey scores the bat assemblage at 22 out of a possible regional 28, or 78%, above its 70% threshold for national importance. Eleven bat species were recorded. Barbastelle was recorded at every static detector and was the third most frequently recorded species, with 11,699 passes and a reported mean activity index of 23.12 passes per hour. The Order Limits therefore form part of a landscape used extensively by a nationally important bat assemblage rather than merely containing isolated hedgerow flight lines. The maternity-colony evidence is particularly important. Multiple barbastelle Core Sustenance Zones overlap the entire Scheme. Independent 2025 work by the Barbastelle Study Group at Little Wood confirmed a maternity colony through licensed radiotracking, with an emergence count of approximately 36 bats pre-parturition and an estimated larger post-parturition colony.	under HePC-007, to Saxlingham Nethergate Parish Council under SNPC-012, SNPC-013, and SNPC-024, and to Shotesham Parish Council under SPC-068 within **The Applicant's Response to Relevant Representations Part 4 - Parish and Town Councils, and Parish Meetings [PDA-011].** Additional information was provided by the Applicant to Norfolk County Council under NCC-035 within **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Further colonies are predicted or unresolved at additional woods. The Norfolk Barbastelle Study Group calls for further radiotracking and woodland survey because acoustic data alone cannot establish the full commuting, foraging and alternative-roost network.	
WR-BEPS-063	Ecology and Biodiversity	The woodland and tree resource compounds the sensitivity. Six ancient woodlands directly adjoin the Scheme, several of them SSSIs. The South Norfolk Tree Warden evidence identifies approximately 621 trees with potential roost features. Repeated access openings, hedgerow gaps, lighting, fencing, traffic, root disturbance and construction therefore affect a functional network, not simply the area of habitat physically removed.	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]**. As set out in the **Design Principles, Parameters and Commitments [REP1-078]** and **Works Plan [REP1-005 and REP1-006]**, design offsets to Ancient Woodland and SSSI's have been embedded into the design of the Scheme. Further mitigation measures such as tree protection fencing are set out in the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]** that are secured through Requirements 13, 14 and 21 of the **Draft DCO [REP1-014].**
WR-BEPS-064	Ecology and Biodiversity	The ecological baseline remains incomplete elsewhere. There has been no full-season botanical survey even though specialist evidence from a level 6 Botanist familiar with the area identified the	An extended habitat survey using UKHab methodology (the standard adopted habitat survey methodology employed in lowland England) 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

ID	Theme	Comments/Issues Raised	Applicant's Response
		need for one due to vanishingly rare assemblages of important botany within and surrounding the order limits. The least-surveyed habitats – roadside verges, historic lanes, hedgebanks, margins and ditch edges – are precisely those exposed to proposed access and highway works. The aquatic appraisal was habitat-led and affected by unusually dry conditions.	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. An updated **Outline Protected Species Mitigation Strategy [REP1-050]** was provided at Deadline 1, which details additional measures to avoid impacts to road verges of important botanical diversity. The Applicant acknowledges that the aquatic habitat surveys were undertaken during unusually dry conditions, as reported **in ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]**. While these conditions may have reduced the wetted extent and depth observed, they did not materially affect the identification of persistent habitat features relevant to aquatic receptors, such as substrate composition, channel and bank structure, undercut banks, exposed tree roots and other stable refugia. Such features would have remained identifiable even where a watercourse was dry and would have been considered on a precautionary basis had they been present. The assessment also considered whether seasonally wetted features could provide habitat for the temporary or seasonal use of aquatic receptors. Conversely, the dry conditions provided useful evidence of the hydrological permanence and likely seasonality of the surveyed watercourses, including the identification of ephemeral features that are unlikely to support receptors requiring permanent or persistent aquatic conditions to establish and maintain populations.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-065	Ecology and Biodiversity	The white-clawed crayfish evidence illustrates the consequence of that baseline weakness. The Applicant's desk study did not identify records within its selected search area, yet the evidence before the Examination includes an Environment Agency record from 2020, two juveniles recorded by Norfolk Rivers Trust in October 2020, three animals recorded by hand survey/eDNA work in 2021 and further confirmation in 2022 at Saxlingham Thorpe, within 2km of the order limits. That is evidence of an extant breeding River Tas population in a hydrologically connected system.	The Applicant acknowledges the additional white-clawed crayfish records presented in Appendix C. Since the initial submission, the Applicant has independently obtained the same information from Norfolk Rivers Trust, confirming an extant population within the wider River Tas catchment. The relevant baseline sections of **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]** will be updated at deadline 3 to reflect these records. These additional records do not identify the species within the Order Limits, and the habitat surveys undertaken within the Order Limits concluded that the surveyed reaches were unsuitable or of low suitability for white-clawed crayfish. Therefore, the additional records do not alter the identified impact pathways or conclusions of the assessment. The sensitivity of the wider River Tas catchment was already recognised, and secured avoidance, biosecurity, pollution prevention and sediment control measures would avoid or minimise potential effects. Significant effects on white-clawed crayfish therefore remain not anticipated. The Applicant provided further information in the **Applicant's Position Statement on White-Clawed Crayfish [PDA-007]**.
WR-BEPS-066	Ecology and Biodiversity	BNG cannot resolve those issues. Habitat units do not determine whether a European Protected Species licence can satisfy the 'no satisfactory alternative' and favourable-conservation-status tests; they do not reproduce ancient woodland; and they do not	The Applicant acknowledges this comment and agrees that a BNG assessment does not replace the requirement for an Ecological Impact Assessment, this is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		establish that a maternity-colony network, crayfish population or rare botanical assemblage remains functional.	
WR-BEPS-067	Ecology and Biodiversity	The ecological objection is therefore principally an avoidance case. That is now particularly clearly supported by NPPF policy N2. It requires consideration of the environmental qualities of the proposed land, strengthening of ecological networks beyond the site, conservation of established trees and hedgerows where possible and minimisation of biodiversity impacts, expressly identifying bats among the species to be supported. Most importantly, where significant biodiversity harm cannot be avoided through location on an alternative site with less harmful impacts, then adequately mitigated or ultimately compensated, the policy directs refusal. This is directly relevant to East Pye's nationally important bat assemblage, overlapping barbastelle maternity-colony landscape, ancient woodland	The Applicant acknowledges this comment and provides a full Ecological Impact Assessment within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Impacts to Ecology and Biodiversity have been avoided by the inclusion of embedded mitigation as set out in Section 8 of the **Outline Construction Environmental Management Plan [REP1-058]**, and an **Outline Protected Species Mitigation Strategy [REP1-050]** both of which will be adhered to prior to and during construction. Methods include the establishment of buffer zones between protected sites, priority and important habitats and important ecological features, including ancient trees, woodland, hedgerows, watercourses and ponds; pollution controls and refuelling and chemical storage requirements; a surface water management plan, the employment of an ECoW, and the delivery of toolbox talks. Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. A detailed approach is provided within the **Biodiversity Net Gain Report [APP-218]** which discusses the Scheme's adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. On the basis of the above it is considered that the biodiversity gain

ID	Theme	Comments/Issues Raised	Applicant's Response
		relationships, roadside botanical interest, water-connected habitats and other strategic ecological networks. BNG cannot replace that sequential test. Nor should claimed BNG benefits above the level actually secured through the DCO receive the same weight as a legally secured outcome.	hierarchy has been correctly applied in relation to the Scheme and the BNG assessment. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [REP1-064]**.
WR-BEPS-068	Ecology and Biodiversity	ExQ1 now asks Natural England directly whether the Applicant has established an adequate bat baseline, including for barbastelles and woodland adjacent to the Order Limits. BEPS will review Natural England's response at Deadline 2 before finalising its position on that issue.	The Applicant acknowledges this comment.
WR-BEPS-069	Water Environment	The water case is one of the most important unresolved technical constraints. The Scheme crosses the River Tas/Hempnall Beck system, Starston Brook, Broome Beck and an extensive network of ordinary watercourses, field drains and groundwater pathways. These are not isolated surface-water features. They are hydrologically and hydrogeologically connected to the River Tas and River	The submitted documentation for the Water Environment has never implied that water and groundwater receptors are not linked. The Scheme takes into account the linkage between potential movement of contaminants into the ground/aquifers through the use of lined surface water drainage systems for the BESS, National Grid Substation and Project Substations. The BESS will have a contained and isolatable drainage system which is designed for both operational surface water runoff and firewater volume as set out and secured within the **Outline BSMP [REP1-066].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		Waveney chalk-stream systems and to the underlying Principal Aquifer, while the Applicant's own scoping material records groundwater as being in broad continuity with watercourse levels. The relevant receptor is therefore a single interconnected surface-water and groundwater system in which disturbance, sediment, pollution, dewatering or the creation of preferential pathways at one location may be transmitted beyond the immediate development parcel to downstream chalk-stream receptors, groundwater-dependent habitats and private or public abstractions. The assessment cannot safely treat individual ditches, crossings, Sites or aquifer receptors as discrete systems where the evidence demonstrates direct connectivity between them.	
WR-BEPS-070	Water Environment	At scoping, the Environment Agency identified 35 private water supplies within 250 m for which accurate locations and/or abstraction strata were unavailable. It required impacts to	The Applicant refers to its response to BEPS-260 and BEPS-261 within **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
		be assessed according to actual influencing distance rather than an arbitrary buffer and subsequently required a wider search because of Principal Aquifer conditions. Six licensed groundwater abstractions occur within 1 km, including a public-water-supply borehole whose Source Protection Zone extends into the Scheme area.	The 35 Private water supplies referenced in the Environment Agency's scoping opinion are the 35 Supplies that were, at Scoping, identified in the Applicant's Scoping Report. The Environment Agency recommended the Applicant "*Determine the locations (and where possible abstracted strata) of, and assess potential impacts to, private water abstractions and their applicable SPZ1 buffers, within potential influencing distance of the site. In the absence of further information assume a reasonable worst case in terms of spatial influence*". As presented in **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]**, following Scoping the Applicant has undertaken further assessment of groundwater abstractions (including permitted abstractions and private water supplies) in accordance with the methodology agreed with the Environment Agency. This includes the agreement and use of Study Areas (i.e. "*potential influencing distance of the site"*, or otherwise "*reasonable worst case"* distances) for the identification of PWS, of 1km around any structure requiring deep piled foundations (the National Grid Substation, BESS and Project Substations) and 250m around other areas of the Order Limits. Omissions in Table 9.7 of **ES Volume 1, Chapter 9 – Water Environment [APP-045]** will be corrected at a later deadline.
WR-BEPS-071	Water Environment	The independent H Fraser Consulting review ('HFCL') identifies 15 numbered technical deficiencies concerning the	The Applicant notes this comment and will respond to this report separately at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		conceptual hydrogeological model, WFD assessment, water resources, private supplies, GWDTEs, firewater, foundations and other pathways. Its conclusion is a 'significant lack of confidence' that impacts upon the water environment are properly understood or capable of mitigation. That conclusion directly challenges Chapter 9's repeated negligible/minor residual findings.	
WR-BEPS-072	Water Environment	The WFD assessment is also contested. HFCL concludes that screening out three surface-water bodies and one groundwater body is not appropriate where development occurs within their catchments and connecting ditches and water features provide pathways. Broome Beck illustrates the problem: Sites and CRCs lie within its WFD catchment and field drains connect towards it, but the waterbody is screened out principally on the assumption that trenchless crossing avoids direct physical disturbance. That does not address sediment, construction runoff, drainage	The Applicant notes this comment and will respond to this report separately at Deadline 3.

ID	Theme	Comments/Issues Raised	Applicant's Response
		alteration, dewatering, fuel or oil release and other catchment pathways.	
WR-BEPS-073	Water Environment	Site 1 and Site 5 concentrate the risk. Site 1 combines BESS, 400 kV infrastructure, hardstanding, transformers, drainage, firewater and sensitive groundwater within the Starston Brook catchment. Site 5 lies within and is directly connected by ditches and a culvert to the River Tas-connected system, with private water supplies, major electrical infrastructure and the ecological sensitivity evidenced by white-clawed crayfish.	The Applicant refers to its response to WR-BEPS-028. The assessments of Sites 1 and 5 presented in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** have been undertaken in accordance with the methodology agreed with the Environment Agency, with further assessment to be undertaken post-consent (including ground investigation and interpretative assessment, Foundation Works Risk Assessment etc.) as further agreed with the Environment agency and described in the **Outline CEMP [REP1-058]**. The Applicant refers to its response to WR-BEPS-065 regarding white clawed crayfish.
WR-BEPS-074	Water Environment	The August 2026 NPPF adds unusually direct policy relevance to these issues. P3 specifically requires development to assess and mitigate unacceptable effects on water quality, with particular reference to sensitive water bodies such as chalk streams. F5 states that the sequential test is intended to steer development towards areas with the lowest flood risk from any source where that test applies, while the flood-risk and	The Applicant notes this comment. The Sequential and Exception Tests have been applied for the Order Limits as set out in Appendix A of **the Planning Statement [REP1-074]**. The Scheme has applied a sequential approach in locating built infrastructure outside of Flood Zones 2 and 3, and outside of areas of 'low' to 'high' surface water flood risk as far as reasonably practicable. Due to operational requirements and other constraints, limited areas of Solar PV Arrays are located within higher surface water flood risk areas, however their design is such that they are raised on narrow supports at an appropriate freeboard

ID	Theme	Comments/Issues Raised	Applicant's Response
		SuDS policies require the site-specific evidence necessary to demonstrate safety and drainage performance.	above ground level/anticipated surface water flood depths and will therefore not have a significant impact on pluvial floodplain storage or flood flow routes. This flood risk mitigation is secured within the **Design Principles, Parameters and Commitments [REP1-078]**. The infrastructure is designed to remain operational and not increase flood risk elsewhere. **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** provides information in relation to the outline surface water drainage arrangements for the impermeable areas at the Scheme. Ground investigations including infiltration testing at targeted locations across the Order Limits will be undertaken during the Examination Period to confirm ground conditions and whether infiltration drainage is feasible. Additional drainage information was submitted as part of an update to **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** to address LLFA concerns. Dialogue with the LLFA is ongoing and the Applicant is progressing a Statement of Common Ground with them.
WR-BEPS-075	Water Environment	ExQ1 now asks how much infiltration testing remains outstanding, whether infiltration-based drainage can properly be finalised before that work is complete, and how much of the drainage design—including	The Applicant has responded to this matter in under Q1.15.1 and Q1.15.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		discharge locations and hydraulic calculations—remains for post-consent approval. Those questions reinforce BEPS's existing submission that this is not merely a detailed-drainage issue. Where the drainage solution remains dependent upon fundamental site characteristics yet to be established, that uncertainty also feeds back into site selection and the application of avoidance.	
WR-BEPS-076	Water Environment	Before any positive recommendation could properly be made, the Applicant would need to demonstrate, on a revised and technically coherent evidence base, the full surface-water–groundwater connectivity, the complete private-water-supply receptor network, compliant WFD screening and assessment, and the acceptability of piling, foundations, dewatering, firewater and other pollutant pathways. Unless those matters are resolved during Examination, the ExA cannot safely conclude that significant effects on the water	The Applicant has previously provided responses to BEPS in relation to the interactions between land contamination, hydrology and hydrogeology, and has detailed the agreement with the Environment Agency for undertaking ground investigation and interpretative assessment as well as Foundation Works Risk Assessment and Hydrogeological Risk Assessment post-consent. The Applicant refers to its response to BEPS-024, BEPS-078, BEPS-114, and BEPS-261 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
		environment have been identified and can be prevented, or that WFD deterioration and risks to public and private water supplies have been excluded. On the present evidence, the water-environment case is not merely incomplete: it is insufficiently reliable to support development consent.	
WR-BEPS-077	Cultural Heritage	Chapter 10 concludes that the Applicant has materially understated the heritage effects of East Pye Solar, both in the number of designated assets affected and in the degree to which their settings contribute to significance. That conclusion is now supported by BEPS's final independent Heritage Impact Assessment, prepared by conservation architect and historic built-environment specialist David Edleston following site visits to the potentially affected listed buildings and Conservation Areas.	The Applicant disagrees that that the conclusions reached in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165-APP-168]** have materially understated the heritage effects of East Pye Solar, both in the number of designated assets affected and in the degree to which their settings contribute to significance. It is noted that the scope, methodology and baseline assessment utilised within the above documents have been supported by both Historic England, as stated within **Statement of Common Ground with Historic England [REP1-089]** and the South Norfolk District Council Senior Heritage & Design Officer, as stated within the **Statement of Common Ground with South Norfolk District Council [REP1-086]**.
WR-BEPS-078	Cultural Heritage	The Applicant's Heritage Statement identifies less-than-substantial harm to only two designated heritage assets and	The Applicant acknowledges the disagreements in levels of harm to heritage assets between the HIA provided by BEPs and the Applicant, and notes that these disagreements are

ID	Theme	Comments/Issues Raised	Applicant's Response
		otherwise generally concludes that the Scheme would cause no harm. The final BEPS Heritage Impact Assessment reaches a materially different conclusion. It identifies less-than-substantial harm from the principal built development to 36 designated heritage assets and further harm associated with road-widening and abnormal-load works, such that 41 designated heritage assets are identified as adversely affected overall. Those include two Grade I and three Grade II* listed buildings.	primarily down to differences in professional judgement. The Applicant further refers to its response at WR-BEPS-077.
WR-BEPS-079	Cultural Heritage	The disagreement is not simply a difference in professional judgment about the degree of visual change. The independent assessment identifies recurring methodological reasons why the Applicant's conclusions are more benign. In particular, the Applicant's assessment places excessive emphasis on direct visual intervisibility while giving insufficient weight to other attributes of setting identified in Historic England guidance, including openness and enclosure,	The Applicant acknowledges that there are disagreements in levels of harm to heritage assets between the HIA provided by the Interested Party and the Applicant. The Applicant notes that **ES Volume 3, Chapter 10.1 – Heritage Statement [APP-165 – 168]** has included consideration of all setting attributes as detailed within Historic England's *The Setting of Heritage Assets. Historic Environment Good Practice in Planning Note 3 (Second Edition)* including, but not limited to, those listed by the Interested Party. It is further noted that seasonal variations in vegetation cover were also considered within **ES Volume 3, Chapter 10.1 – Heritage Statement [APP-165 – 168],** as well as within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043],** the Heritage Statement further utilised the photosheets

ID	Theme	Comments/Issues Raised	Applicant's Response
		topography, historic and functional relationships, group value, historic land use, tranquillity, remoteness, degree of change over time and the way assets are experienced while moving through the landscape. Seasonal effects are also material: the HIA identifies a number of locations where winter conditions materially increase intervisibility between heritage assets and the proposed development.	presented within **ES Volume 3, Appendix 7.5 – Photosheets [APP-122 – APP-134]** and visualisations presented within **ES Volume 3, Appendix 7.6 – Visualisations [APP-135 – APP-146]** as part of the assessment of setting.
WR-BEPS-080	Cultural Heritage	That distinction is particularly important in the South Norfolk Claylands. The historic environment is not composed of isolated listed buildings surrounded by neutral countryside. The area contains a long-established agricultural landscape of medieval churches, historic farmsteads, greens, commons, ancient lanes, field patterns and vernacular buildings whose significance is partly derived from their continued relationship with open and predominantly undeveloped farmland. The HIA identifies a strong and enduring	The Applicant refers to its response regarding the South Norfolk Claylands provided Block East Pye Solar's relevant representation [RR-0200] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID BEPS-195. The Applicant agrees that the area contains a long-established agricultural landscape of medieval churches, historic farmsteads, greens, commons, ancient lanes, field patterns and vernacular buildings whose significance is partly derived from their continued relationship with open and predominantly undeveloped farmland.

ID	Theme	Comments/Issues Raised	Applicant's Response
		relationship between locally distinctive historic buildings and the surrounding agricultural landscape, including settings which have remained substantially open for centuries.	
WR-BEPS-081	Cultural Heritage	The final HIA therefore identifies a much wider pattern of harm than the Applicant. Of particular concern are effects upon the Grade I Church of St Catherine at Fritton; the Grade I Church of St Michael, Grade II* Old Rectory and Grade II barn at Stratton St Michael; Grade II* Oaks Farmhouse at Woodton; Grade II Moulton Farmhouse; Hill House at Pulham Market; and Barn Cottages at Tivetshall St Margaret. The strongest cases illustrate why the heritage objection cannot be reduced to whether infrastructure is technically visible from a particular window or viewpoint.	The Applicant notes the heritage assets stated by BEPS and refers to the following: <u>Grade I Church of St Catherine:</u> • See response WR-BEPS-083; • See response BEPS-295 in in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** <u>Grade I Church of St Michael, Grade II* Old Rectory, Grade II Barn:</u> • See response WR-BEPS-082; • See response BEPS-294 in in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** <u>Grade II Moulton Farmhouse:</u> • See responses BEPS-292 – BEPS-293 in in **The Applicant's Response to Relevant Representation**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]. <u>Grade II* Oaks Farmhouse:</u> • See response WR-BEPS-084. <u>Grade II Hill House:</u> The setting of Hill House is largely defined by its prominent frontage onto the busy main route of Ipswich Road, which lies between the listed building and Sub-Site 2A. The south-eastern part of Sub-Site 2A already possesses a hedgerow of varying maturity, with the hedgerow west of Hill House fairly established, though it is acknowledged that there are gaps in this coverage which allows for intervisibility between Hill House and this field within Sub-Site 2A. The Applicant has sought, during the design process, to avoid, reduce or mitigate impacts upon heritage assets and their setting, as detailed within both **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and **Planning Statement [REP1-074].** This includes visual screening in the form of linear native tree belts, enhanced hedgerows and infilling of gaps in existing hedgerows, as well as establishment of setbacks within certain areas of the Scheme. Within the field immediately opposite Hill House, a 20m set back has been established along the entire Ipswich Road boundary, with a native broadleaf woodland proposed behind the existing hedgerow, as identified on the **Green Infrastructure Strategy [REP1-013]**. Setbacks incorporated into the design of Scheme, combined with the proposed landscape mitigation,

ID	Theme	Comments/Issues Raised	Applicant's Response
			will ensure that the roadside prominence of the designated heritage asset is preserved and that the presence of Solar PV arrays will not distract from views, and therein appreciation, of the listed building from this main thoroughfare. The significance of Hill House is principally vested in its architectural and historic interests as an early 19th century workhouse and an interesting octagonal, cross-shaped planform designed by a local, and relatively prolific architect, William Thorold. The setting of institutional buildings such as Hill House were deliberately built away from settlements and as such, its isolated location contributes to an understanding of its original, historical positioning here. Views that allow for an appreciation of this significance are largely from the roadside looking eastwards and from the adjacent footpath looking southwards, which would be entirely unaltered by the Scheme. The historic connection between the former workhouse and surrounding fields has effectively been severed by the expansion of the former turnpike road, now Ipswich Road, and the large car parks to the west and south of the listed building serving the adjacent nursery. It is viewed by the Applicant that the key elements of the listed building's setting, specifically its roadside prominence and historic grounds, and its relationship with the village of Pulham Market to the south-east (one of the villages the workhouse served), will remain unaltered by the Scheme, which is not situated between either the listed building and the roadside nor the listed building and village. The presence of Ipswich Road, due to the volume of traffic

ID	Theme	Comments/Issues Raised	Applicant's Response
			and level of noise, negatively dominates the west side of the heritage asset and experience within this portion of the setting. As such, it is considered that the ability to understand its siting from within Site 2A here and the way in Solar PV arrays within Site 2A would result in a change of use and would likely be at least partially visible from Hill House. However, visibility of elements of the Scheme does not automatically equate harm. It is not considered that the implementation of landscape mitigation within this area will result in the enclosure for views from the asset over agricultural land to the west. Hill House is set back c. 25m from Ipswich Road, and this set back will still preserve the sense of openness to the west. **ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139]** shows the visualisations of the site from the north-western corner of the Hill House complex, as well as views towards Hill House from PRoW BR9. It is acknowledged that while the presence of Solar PV Panels within Sub-Site 2A will entirely impede any views of the western elevation of Hill House from BR9, these views already exist at quite a distance and are partially screened by the vegetation west of Ipswich Road, as well as along the intervening fields. It is considered that partial visibility of Solar PV arrays in a small section portion of a listed building's setting, at least partially screened by existing hedgerows and trees, and on

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			the other side of the heavily used Ipswich Road, would not be such that the significance of Hill House would be vitiated. Grade II Barn Cottages: This pair of cottages are situated to the south of Station Road, immediately opposite a row of three cottages, within a wider rural, agricultural setting. Whilst there is little vegetation surrounding the properties, there are mature trees dotage around the surrounding landscape that serve to block longer distance views, particularly to the north. The landform drops off to the south and provides a much wider vista as a backdrop to the cottage, and views from the roadside looking south toward the Barn Cottages best demonstrate its rural setting. The significance of this asset is largely vested in its architectural and historic interest as a 17th century house, and **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]** notes that the surrounding agricultural landscape contributes to its significance in terms of its function as a rural property, in particular in views of this asset from the roadside looking south, where views are largely unimpeded. The Applicant notes views to the north of Barn Cottages are not defined by their openness and are rather limited and channelled by existing vegetation. The Applicant's view is that landscaping proposals along the southern edge of the 400kv Substation will likely be sufficiently dense to effectively screen any visible elements of the Substation once matured.

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			It is noted that the cultural heritage assessments have identified a minor adverse effect to Barn Cottages, at the lowest end of the scale. The Applicant notes that this conclusion has been derived based on potential residual effects upon the significance of Barn Cottages, part of which includes the elements of its setting which contribute to this significance. Having been assessed as 'minor adverse and the lowest end of the scale', it is noted that impacts upon both significance and setting will reduce to no harm as the proposed landscape screening has matured.
WR-BEPS-082	Cultural Heritage	At Site 4B, the Grade I Church of St Michael, Grade II* Old Rectory and Grade II barn form an important historic group. The HIA identifies moderate less-than-substantial harm to all three. Their significance is reinforced by historic, visual and functional relationships with one another and with the open agricultural land to the north. Although the recent Long Stratton bypass has introduced some adverse change to the setting, the associated new footbridge has opened important panoramic views in which the three buildings are experienced together against their surviving rural setting. The proposed solar arrays and 132 kV substation	The Applicant refers to its response provided to Block East Pye Solar's relevant representation [RR-0200] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID BEPS-294. The Applicant further notes that Historic England has provided comments on the Grade I Church of St Michael and Grade II* Old Rectory within Stratton St Michael 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's WR-HE-008 and WR-HE-010, which they support the exclusion of the southern fields of Sub-Site 4B from built development and the resulting substantial setback of the panels to retain the open land to the north. South Norfolk District Council (SNDC), as the relevant local authority, have provided no comments within their relevant representation [RR-1795], local impact report **[REP1-213]** or Statement of Common Ground **[REP1-**

ID	Theme	Comments/Issues Raised	Applicant's Response
		would introduce industrial infrastructure into that historic relationship. Existing harm from the bypass does not extinguish the contribution which the surviving setting continues to make to significance; further industrialisation would compound rather than neutralise that harm.	**086]** on any of the three identified assets within Stratton St Michael.
WR-BEPS-083	Cultural Heritage	At Site 5B, the Grade I Church of St Catherine at Fritton occupies an unusually isolated and tranquil setting. The HIA records the importance of peace, seclusion, historic agricultural association and open views from the churchyard, with significantly greater intervisibility during winter months than is apparent in summer vegetation. It identifies moderate-to-high less-than-substantial harm from the introduction of solar infrastructure and the Site 5 substation into that rural setting and also identifies the potential for operational noise to affect the tranquillity of the churchyard.	The Applicant refers to its response provided to Block East Pye Solar's relevant representation [RR-0200] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID BEPS-210 and BEPS-295. The Applicant further notes that Historic England has provided comments on the Grade I Church of St Catherine within Fritton 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's WR-HE-009 and WR-HE-070, which they support the setback from the Church within the south-eastern fields of Sub-Site 5B and agree with the conclusions reached in the Applicants heritage statement, namely *"the [substantial setback] would retain the prominence of the church and its rural setting, particularly on the approach along The Street."* South Norfolk District Council (SNDC), as the relevant local authority, have provided no comments within their relevant representation [RR-1795], local impact report **[REP1-213]** or

ID	Theme	Comments/Issues Raised	Applicant's Response
			Statement of Common Ground **[REP1-086]** regarding the Church of St Catherine.
WR-BEPS-084	Cultural Heritage	At Site 7L, the Grade II* Oaks Farmhouse remains in an isolated rural setting surrounded by open land which has remained substantially undeveloped for centuries. The HIA identifies moderate less-than-substantial harm because the proposed arrays would introduce large-scale, moving industrial infrastructure into that setting at relatively close range.	The Applicant notes that **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]** acknowledge that the agricultural hinterland does form part of the wider historic setting of this heritage asset, and there is a tenurial link between this asset and much of the surrounding land, including Sub-Site 7L. Oaks Farmhouse is currently set within a small plot which is enclosed by the property's garden's, which are bounded by mature hedgerows and trees to afford the complex a degree of privacy as a residence. A small field separates Oaks Farmhouse and Sub-Site 7L, with the eastern boundary of Sub-Site 7L formed of mature vegetation, though there are some gaps in this hedgerow which provide intervisibility between the heritage asset and the south-eastern corner of Sub-Site 7L. As part of the development of the Scheme, a setback has been established along the eastern boundary of Sub-Site 7L, with this setback resulting in the removal of much of this intervisibility. Visual screening, in the form of infill planting of the existing hedgerow, as well as the introduction of a new native broadleaf woodland at the eastern boundary of Sub-Site 7L, will be carried out to further reduce any visibility from this heritage asset.

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			While it is acknowledged that the introduction of Solar PV Panels within Sub-Site 7L will constitute a minor change to the wider setting of Oaks Farmhouse, the wider vistas are not a key part in demonstrating the setting of this heritage asset, nor is the significance of the property highly influenced by this setting The assessments concluded that the overall significance of this designated heritage asset will not be harmed by the Scheme.
WR-BEPS-085	Cultural Heritage	These examples also expose a fundamental weakness in the Applicant's reliance on landscape screening as heritage mitigation. Screening and preservation are not equivalent. The HIA repeatedly identifies circumstances in which planting may reduce visibility of infrastructure while itself causing harm by enclosing historically open settings, blocking important views or severing long-established visual and functional relationships between heritage assets and the agricultural landscape from which their significance partly derives. It relies on Historic England guidance that screening can mitigate a negative impact but is not a substitute for well-designed	The Applicant notes that 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."* The Applicant also refers to its response provided to the ExA in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** under ExQ ID Q1.1.1.

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		development within the setting of heritage assets.	
WR-BEPS-086	Cultural Heritage	That issue was reinforced at ISH1, where the ExA questioned the amount of material design still left to detailed design, including the position and number of conversion units, ancillary buildings and the appearance of major infrastructure. The ExA also sought further illustrative material for the National Grid substation and overhead-line works and established that proposed pylons may be higher than the existing structures. The heritage assessment must therefore correspond to the development actually capable of being authorised by the DCO. Maximum height alone does not necessarily represent the heritage worst case. Siting, massing, enclosure, technology choice, acoustic barriers, ancillary buildings, fencing and the combined disposition of infrastructure can materially alter the effect on significance. This is particularly important around Great	The Applicant refers to its response provided to the ExA in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** under ExQ ID's Q1.2.1 – Q1.2.15. The Cultural Heritage assessments have assessed the Scheme according to the Rochdale Envelope, assuming a 'worse-case scenario' that the whole of the Scheme (apart from the setbacks) will be covered in Solar PV Panels and associated infrastructure.

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		Moulton, Stratton St Michael, Fritton, Barn Cottages and Beulah House and Barn, where the final HIA identifies uncertainty over the ultimate form and visibility of substations, BESS and associated infrastructure.	
WR-BEPS-087	Cultural Heritage	The August 2026 NPPF reinforces those concerns. Although the Energy NPSs remain the principal policy framework for this NSIP, the current heritage policies are materially relevant. They require harm to significance, including harm arising through setting, to be avoided where possible and otherwise minimised; require clear and convincing justification for harm to designated heritage assets; require the decision-maker to be satisfied that the assessment accurately reflects the effect on significance; and require substantial weight to be given to the conservation of designated heritage assets, with any harm treated as a matter of considerable importance and weight. The ExA has expressly required the Applicant through ExQ1 to explain	The Applicant refers to its response provided to the ExA in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** under ExQ ID Q1.8.1.

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		the implications of the August 2026 NPPF for its heritage case. That is significant because the central dispute is not simply whether individual effects are labelled "low" or "moderate". It is whether the Applicant's assessment accurately captures the contribution which open agricultural setting, historic approaches, tranquillity, group value, landscape relationships and historic land use make to the significance of the affected assets.	
WR-BEPS-088	Cultural Heritage	The HIA also raises a separate concern over the Applicant's EIA sensitivity methodology. Chapter 10 describes Grade II listed buildings as being of "medium" or "regional" sensitivity. Grade II listed buildings are nationally designated heritage assets. Although an EIA matrix may legitimately distinguish between different levels of heritage significance for assessment purposes, that classification must not result in nationally designated assets receiving diminished statutory or policy weight. Each	The methodology adopted within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** is in line with appropriate guidance and has been derived following consultation with relevant stakeholders (i.e. SNDC and Historic England). This methodology of ascribing 'Medium (regional)' significance has been used in similar solar scheme DCO application assessments, some examples being The Droves, Kings Lynn; Lime Down, Wiltshire; Mallard Pass, Lincs; Meridian, Lincs; and Greenhill, Northants.

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		asset and the contribution of its setting must be assessed on its own significance rather than treated as merely regional because of its Grade II status.	
WR-BEPS-089	Cultural Heritage	The transport strategy creates additional heritage effects which are not adequately captured by assessment of the solar arrays alone. The final HIA identifies harm associated with proposed works at Fairstead Lane and through Saxlingham Nethergate. At Fairstead Lane, a narrow historic sunken lane bounded by hedgerows forms part of the setting of Hill Farmhouse, Tramp's Hall and the adjacent listed barn. Road widening, verge alteration and hedgerow loss would change the rural character of that setting. At Saxlingham Nethergate, abnormal-load movements and potential highway works affect a historic Conservation Area containing numerous listed and locally important buildings, including the Grade II* Old Rectory and the War Memorial. The HIA concludes that any removal of the	The Applicant acknowledges the concerns raised regarding potential heritage effects associated with highway works required to facilitate construction of the Scheme, 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. **ES 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 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 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.

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		historic brick-and-flint boundary wall to the Old Rectory could result in harm at the higher end of the less-than-substantial scale. Those effects are important because highway works are not ancillary in heritage terms merely because they are necessary for construction. If the selected Sites require widening of historic lanes, alteration of traditional boundaries, removal of hedges or intervention in Conservation Areas to make the Scheme constructible, those effects form part of the environmental consequences of the chosen configuration.	The Applicant notes that the heritage effects have been assessed within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. In regard to potential impacts to Saxlingham Nethergate Conservation Area, The Grade II* Old Rectory, War Memorial, Hill Farmhouse, Tramps Farmhouse and other listed and locally listed structures within the village, the Applicant refers to their response provided to the ExA in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** under ExQ ID Q1.8.3, as well the responses provided within Annex B: Schedule of Heritage Assets of the same document.
WR-BEPS-090	Cultural Heritage	The cumulative heritage effect is also greater than the sum of individual asset assessments. The HIA identifies a landscape in which churches, farmsteads, lanes, greens, commons and agricultural settings are repeatedly experienced together while travelling through the area. The insertion of solar arrays, substations, BESS, pylons, fencing, access infrastructure and mitigation planting across that	The Applicant notes that cumulative impacts to cultural heritage assets have been addressed in Section 10.11 of **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].**

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		landscape would progressively erode those historic relationships. This is consistent with the wider concern raised throughout the Written Representation that East Pye is assessed too compartmentally. A succession of individual "low" effects does not necessarily capture the landscape-scale heritage consequence of transforming the settings of numerous historic buildings and Conservation Areas across the same historic rural system.	
WR-BEPS-091	Cultural Heritage	Historic England's own Relevant Representation is also important. It does not endorse the Applicant's general "no harm" position. Historic England acknowledges that changes to setting are capable of amounting to policy harm, that residual harm may remain after mitigation and that cumulative effects with other energy infrastructure require examination. The independent HIA materially reinforces those concerns by identifying substantially more affected assets and by explaining the setting	The Applicant note that heritage assets have been considered as part of the site selection process and refers to **Site Selection Assessment [APP-215]** as well as **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041].** The Applicant also refers to its response's provided to Block East Pye Solar's relevant representation [RR-0200] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID's BEPS-161 – BEPS-173.

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		attributes which the Applicant's assessment has undervalued. The heritage evidence must therefore feed back into site selection. Where detailed assessment now identifies harm to high-status designated assets and historically open settings, the examination should ask whether those constraints were capable of being avoided through a different layout, omission of particular parcels or a materially different configuration, rather than treating screening as the default response after the land had already been selected.	
WR-BEPS-092	Cultural Heritage	The policy consequences are significant. EN-1 requires great weight to be given to the conservation of designated heritage assets and clear and convincing justification for harm. The August 2026 NPPF likewise requires substantial weight to be given to conservation and treats harm to designated heritage assets as a matter requiring clear justification. Less-than-substantial harm remains harm and must be	The Applicant considers that the assessments of heritage assets provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** which is supported by **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]** has been undertaken in accordance with the appropriate legislation, policies and guidelines, and best practice, and are robust and appropriate for the assessment of the Scheme. Likewise, the scope, methodology and baseline assessment utilised within the above documents have been supported by both Historic England, as stated within **Statement of Common Ground with Historic England [REP1-089]** and the South Norfolk District Council Senior Heritage & Design

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		weighed against the public benefits of the Scheme. The importance of the final HIA is therefore not that it identifies substantial harm; it expressly does not. Its significance is the **extent, distribution and cumulative weight of the less-than-substantial harm**. The Applicant identifies such harm to only two designated assets. BEPS's independent specialist assessment identifies adverse effects upon 41 designated heritage assets overall, including two Grade I and three Grade II* buildings. That difference is too large to be dismissed as a minor variation in professional judgment. It raises a fundamental question as to whether the Applicant's heritage assessment has adequately characterised the receiving historic environment and the contribution made by its rural setting.	Officer, as stated within the **Statement of Common Ground with South Norfolk District Council [REP1-086]**. The Applicant acknowledges the disagreements in levels of harm to heritage assets between the HIA provided by BEPS and the Applicant, and notes that these disagreements are primarily down to differences in professional judgement.
WR-BEPS-093	Cultural Heritage	The correct Chapter 10 conclusion is therefore that the Applicant has not yet demonstrated that the	The Applicant disagrees that that the conclusions reached in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** has materially understated the heritage effects of East Pye

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		heritage effects of East Pye are as limited as its ES suggests. Before the heritage balance can be completed, the Examination should have: • the heritage schedule requested through ExQ1, reconciling the Applicant's conclusions with Historic England, the local authority and BEPS evidence; • assessment of the August 2026 NPPF heritage policies; • clear worst-case assessment of the BESS, National Grid and project substations, pylons, ancillary infrastructure and acoustic/security structures; • additional representative viewpoints, including winter conditions where material; • full assessment of highway and abnormal-load works affecting historic lanes, listed buildings and Conservation Areas;	Solar, both in the number of designated assets affected and in the degree to which their settings contribute to significance. The Applicant refers to **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]** and also refers to the responses provided at WR-BEPS-86 – WR-BEPS-91 above. The Applicant notes the comments regarding Site 4B, 5B and 7L and note that heritage assets were taken into consideration as part of site selection (see **Site Selection Assessment [APP-215]**) and design stages (see **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** of the Scheme.

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		• a cumulative assessment of historic-landscape effects; • and an explicit explanation of why avoidance of development at Sites 4B, 5B and 7L has not been preferred where the independent assessment identifies particular heritage sensitivity. The Applicant's conclusion of essentially no residual heritage harm is therefore not supported by the evidence now before the Examination. The issue is not whether every identified effect is individually decisive. It is whether the cumulative statutory and policy weight of harm across a large number of nationally designated assets, including several assets of the highest grades, has been properly recognised before being weighed against the Scheme's public benefits.	
WR-BEPS-094	Transport and Access	Chapter 11 presents another gateway issue: East Pye Solar cannot be built unless a physically available, environmentally	The Applicant notes the comments regarding national planning policy, Public Rights of Way and transport access. The relevant legislation, planning policy and guidance considered as part of the transport assessment are set out

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		assessed and highway-authority-acceptable access system exists. The August 2026 NPPF gives further relevant context. The current transport policies require consideration of reasonable future scenarios and cumulative transport impacts, while TR8 requires PRoWs to be protected and enhanced and recognises the importance of direct and circular recreational routes.	within Section 11.3 of **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**. A more detailed summary of the relevant legislation, planning policy and guidance is also provided within **ES Volume 3, Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-128]**. The effects of the Scheme on Public Rights of Way and transport access have been assessed having regard to this policy and guidance framework.
WR-BEPS-095	Transport and Access	ISH1 also clarified an important mitigation trade-off. NCC favours internal haul routes where they can avoid extensive HGV use of unsuitable rural roads, but those routes themselves require construction across open countryside, crossings of ecological and hydrological features and interaction with PRoWs and soils. EPS also confirmed that significant internal haul roads would be removed after initial construction even though later panel and electrical-equipment replacement is anticipated.	The Applicant notes the concerns raised. The proposed access strategy, including the use of internal haul routes and crossing points during both the construction and operational phases of the Scheme, has been assessed within **ES 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 environmental effects associated with these arrangements are assessed within the relevant chapters of the Environmental Statement. Construction access, traffic management and construction sequencing would be managed through the **Outline CTMP [REP1-068]** and detailed Construction Traffic Management Plan, with operational access managed through the **Outline OTMP [APP-202]**. The Applicant considers that the Scheme has a deliverable transport solution and that the necessary management measures are provided within the application documents.

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		The appropriate question is therefore not whether internal haul routes are intrinsically preferable to rural-road use. It is whether the selected Sites have a genuinely deliverable transport solution once the environmental consequences of both alternatives are accounted for. ExQ1 separately requires the Applicant to identify which transport mitigation remains dependent upon future approval, design or agreement.	
WR-BEPS-096	Transport and Access	Norfolk County Council's June 2026 Relevant Representation states expressly that the submitted strategy for Sites 7–10 does not adequately address the highway constraints, does not provide sufficient mitigation and 'cannot be supported'. For Sites 7–9 it requires access through CRC8 west of Hempnall and internal haul roads or cable-corridor connections. For Sites 10A–10D it requires a common Harvey Lane access with internal connections, and Site 10E through CRC14. That is materially different from the public-road	The Applicant notes the concerns raised. The Applicant continues to engage with Norfolk County Council in its role as Local Highway Authority regarding access arrangements and construction traffic management associated with the Scheme. This engagement will continue throughout the Examination process, including in relation to traffic management measures, access arrangements and associated mitigation. The Applicant is also continuing to engage with Norfolk County Council through the Statement of Common Ground (SoCG) process, through which relevant highways and construction traffic matters will continue to be progressed. Another updated SoCG with NCC will be provided at Deadline 3.

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		strategy assessed by the Applicant. The history demonstrates that this is not a minor CTMP matter. NCC rejected construction traffic on Hall Lane and regarded Fairstead Lane as inappropriate, yet Hall Lane remains within later routeing and AIL proposals. Fairstead Lane, The Krons and other routes have repeatedly changed. If the NCC solution requires new internal routes, land, watercourse crossings, PRoW crossings, tree loss or drainage works, those consequences themselves require assessment.	
WR-BEPS-097	Transport and Access	The Applicant identifies 65 construction access and crossing points. Many relevant roads are single-track, constrained by vegetation, bridges, limited passing places, residential frontage or schools. The Transport Assessment records construction traffic increases of 116% on Fairstead Lane, 58% on Shotesham Road, 45% on Bussey's Loke and 48% on Market Lane. Low existing flows do not	The Applicant notes the concerns raised. The proposed traffic management measures can be found in Section 7 of the **Outline Construction Traffic Management Plan [REP1-068] and** have been identified to facilitate the safe and efficient movement of construction traffic whilst minimising impacts on local communities and other road users. The Applicant does not agree that the inclusion of such measures demonstrates that the affected routes are incapable of accommodating construction traffic. Rather, the measures form part of a comprehensive construction traffic management strategy that would be developed further through the detailed

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		establish low sensitivity where the roads are physically narrow and used by pedestrians, cyclists and equestrians. The mitigation package itself demonstrates the constraint: holding areas, call-forward systems, one-HGV-at-a-time release, marshals, signals, passing places, speed restrictions and compressed delivery windows. Those measures may manage a workable route; they do not prove that the route is physically or programmatically capable of delivering the Scheme.	Construction Traffic Management Plan, secured as a Requirement 15 of the **Draft DCO [REP1-014]**. The Applicant agrees that low existing traffic flows do not necessarily indicate low sensitivity. Accordingly, the sensitivity of each assessed road link was determined having regard to the characteristics of the route and its surrounding receptors, in accordance with the ISEP Guidelines for Environmental Assessment of Road Traffic (2023). The sensitivity assigned to each link, together with the justification for that classification, is presented in Table 11.11 of **ES Volume 1, Chapter 11, Transport and Access [APP-047]**.
WR-BEPS-098	Transport and Access	Abnormal indivisible loads remain independently unresolved. There is no final port of entry, final SRN route or final local route for all major equipment. National Highways maintains a formal objection, requiring further work on the A47/A140 junction, cumulative construction traffic, worker travel, traffic caps, AIL routing and Requirement 15, and states that it cannot remove its objection unless	The Applicant can confirm that dialogue is continuing with National Highways, NCC and SCC regarding AIL routeing including potential final port entry options. Abnormal load specialists Wynns have undertaken initial route analysis including Swept Path Assessment (SPA) work. The AIL report is provided in part three of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-176].** The Applicant can also confirm that dialogue continues with National Highways to resolve the outstanding points as noted. The Applicant has environmentally assessed the construction vehicle routes and applied the mitigation hierarchy for traffic

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		the matters are resolved before recommendation. Transport is therefore not merely an adverse effect capable of later management. The Applicant has not yet demonstrated an end-to-end construction system which both highway authorities accept and which has been environmentally assessed.	and transport through the assessment presented in **ES Volume 1 Chapter 11 – Transport and Access [APP-047]** and supported by the **Transport Assessment [APP-174-177], Outline Construction Traffic Management Plan [REP1-068], Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]** and **Outline Operational Traffic Management Plan [APP-202].** Together they set out the assessment methodology and the management and mitigation measures for the Scheme.
WR-BEPS-099	Noise and Vibration	The Applicant's own modelling identifies serious effects which are subsequently downgraded largely by reference to duration or future mitigation. For HDD, 15 night-time receptors are predicted above SOAEL, with effects extending to Major Adverse. Dwellings at Lundy Green, Market Lane Farm, Thetford Farm House, Dawsons Farm and Wash Lane are among those identified. Chapter 12 nevertheless concludes that the effects are not significant because HDD at each location is expected to be short-lived. That confuses EIA duration with the separate policy significance of an effect which the Applicant itself	The Applicant does not consider that the predicted effects have been "downgraded" solely by reference to their duration. The assessment distinguishes between the magnitude of the predicted impact at an individual receptor and the determination of whether that effect is likely to be significant in EIA terms. The reasonable worst-case assessment identifies that night-time HDD could result in noise above the SOAEL at 15 receptors, with effects ranging from moderate to major adverse. The Applicant therefore acknowledges that, while such works are taking place, noise may be "present and disruptive" and may cause material disturbance. The assessment does not seek to disregard that impact. Rather, it concludes that a likely significant environmental effect would not arise because HDD at an individual drilling location is expected to be of short duration, ordinarily up to two days, and because the construction-noise methodology applies duration as one of the factors relevant to EIA significance. **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**

ID	Theme	Comments/Issues Raised	Applicant's Response
		characterises as 'present and disruptive' and capable of sleep disturbance.	also explains that the HDD assessment does not include the potential benefit of screening, which could reduce sound levels by up to 10 dB depending on the circumstances. The Applicant nevertheless accepts that a conclusion of "not significant" in EIA terms does not mean that no adverse effect would occur or that an exceedance of SOAEL requires no further action. Where night-time HDD is necessary, the detailed methodology, predicted receptor-specific noise levels and practicable mitigation would be considered through the Section 61 process. Mitigation would include the selection of quieter practicable plant and working methods, the location and orientation of equipment and the use of localised acoustic screening. The Outline CEMP commits the Applicant to seeking Section 61 consent where works anticipated to generate significant noise effects are required outside standard working hours.
WR-BEPS-100	Noise and Vibration	The rural acoustic baseline is exceptionally low: night and early-morning levels are frequently in the high teens or low 20s dB LA90. Seven operational receptors are initially predicted at approximately +6 to +8 dB above background in the early-morning period. Those effects are removed in the later modelling by applying additional inverter mitigation rather than by demonstrating that the	The Applicant acknowledges that the existing rural acoustic environment is quiet. Typical background sound levels reported in Table 12-17 of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** range down to 18 dB LA90,15min during the night-time period and 20 dB LA90,15min during the early-morning period. Those measured levels were used in the operational assessment. The Applicant also acknowledges that the initial modelling, excluding additional mitigation, identified adverse early-morning effects at some residential receptors. However, the final design is not permitted to operate at these unmitigated levels.

ID	Theme	Comments/Issues Raised	Applicant's Response
		submitted design is inherently quiet.	Operational noise is controlled through the **Outline OEMP [REP1-060]**. Table 3.7 specifies noise-control measures for the solar infrastructure and BESS, including low-noise plant selection, acoustic attenuation or enclosure, control and orientation of BESS cooling fans, mitigation of tonal features and a 4 m-high acoustic fence around the BESS enclosure. It also establishes separate noise requirements for the receptors most likely to be affected by the BESS and for all other receptors. These controls are secured by Requirement 14 of the **Draft DCO [REP1-014]**. Requirement 14 requires an operational environmental management plan for each relevant part of the authorised development to be submitted to and approved by the relevant planning authority before final commissioning of that part. The detailed OEMP must be substantially in accordance with the Outline OEMP. Accordingly, the applicable operational noise limits and mitigation measures must be incorporated into the approved operational controls. The Applicant therefore does not rely on the indicative equipment being inherently quiet. The detailed design, plant selection and mitigation must comply with the operational noise controls contained in the Outline OEMP and secured through Requirement 14.
WR-BEPS-101	Noise and Vibration	Mitigation is extensive and fundamental to the Applicant's case. It includes 4 m acoustic barriers around the BESS, reduced fan duty, quieter equipment selection, plant	The Applicant agrees that operational noise mitigation is integral to the assessed design. The initial modelling using representative plant data identified the acoustic performance required from the final equipment selection, layout and mitigation. The necessary measures, including the separate

ID	Theme	Comments/Issues Raised	Applicant's Response
		orientation, attenuators and acoustic enclosures. Those measures are not precautionary refinements to an inherently acceptable design: they are required because the unmitigated development produces materially worse effects in an exceptionally quiet rural environment. The Applicant's own scoping work acknowledged that final equipment selection would not occur until after the DCO decision and that operational assessment would therefore initially rely on comparable library plant. The environmental acceptability of the BESS and associated electrical infrastructure is consequently dependent upon a future combination of equipment specification, operational restriction and substantial physical screening which has not yet been demonstrated for the final plant.	BESS controls and receptor-specific noise requirements, are set out in **Outline OEMP [REP1-060]**. Operational noise is therefore controlled through the detailed OEMP, which must be substantially in accordance with the Outline OEMP and is secured by Requirement 14 of the **Draft DCO [REP1-014]**. The final plant selection and design must incorporate the measures necessary to comply with those secured operational noise controls.
WR-BEPS-102	Noise and Vibration	That dependence on mitigation is itself relevant to siting. A BESS or substation which requires 4 m acoustic barriers, restricted cooling operation, careful orientation,	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.

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		quieter plant, attenuators and enclosures in order to approach acceptable noise conditions is not infrastructure which the receiving acoustic environment readily accommodates. The baseline here is not an urban or industrial soundscape in which additional plant noise can be readily masked; night and early-morning background levels are frequently only in the high teens or low 20s dB LA90. In that context, the scale of intervention required to suppress operational sound is evidence of an inherent conflict between major continuously operating electrical infrastructure and its chosen rural location. Good design should first avoid creating the conflict; it should not depend upon progressively enclosing and attenuating an intrinsically noisy installation after the location has been selected.	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. The necessary measures, including the separate BESS controls and receptor-specific noise requirements, are set out in the **Outline OEMP [REP1-060]**.
WR-BEPS-103	Noise and Vibration	The construction case is still more serious because mitigation does not remove the admitted effect. Fifteen night-time receptors are predicted above SOAEL during	The Applicant refers to their response to WR-BEPS-099.

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		HDD, with effects extending to Major Adverse and including identified dwellings at Lundy Green, Market Lane Farm, Thetford Farm House, Dawsons Farm and Wash Lane. The Applicant does not demonstrate that those noise levels are rendered acceptable by mitigation; instead, it relies principally upon the anticipated duration of HDD at each location to conclude that the resulting EIA effect is not significant. The physical noise exposure therefore remains: the assessment simply changes its significance classification because it is expected to occur for a limited period. Where the Applicant itself identifies night-time noise above SOAEL—an effect characterised as 'present and disruptive' and capable of causing sleep disturbance—the fact that residents may experience it for a shorter period does not demonstrate that the location or construction methodology is environmentally acceptable.	

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-104	Noise and Vibration	There is also unresolved uncertainty even in the mitigated operational case. South Norfolk Council's independent acoustic review questions source geometry, frequency-dependent modelling, point-source assumptions, barrier performance and whether the complete National Grid plant inventory has been included. The Applicant has not disclosed the source spectra necessary to verify the low-frequency assessment and applies no BS 4142 acoustic-character correction for tonality or distinctiveness. In a rural soundscape of this quietness, those omissions are material because transformer hum, inverter tones and fan noise may be considerably more perceptible than an equivalent level of non-distinctive sound.	The Applicant acknowledges that the operational assessment is based on representative plant data and that the final equipment specification and layout will require verification through the detailed design process. However, it does not agree that the matters raised remain wholly unresolved. The modelling used typical one-third-octave source spectra and frequency-dependent propagation calculations. The use of point sources was considered appropriate because the receptors are at distances significantly greater than the relevant plant dimensions, with BESS containers also represented as area sources. Additional modelling using five rather than two reflection orders produced changes of no more than 1 dB at the assessed BESS receptors and did not alter the conclusions on significance. Four National Grid transformers were included at a sound power level of 85 dBA each as a precautionary assumption, although the final National Grid plant inventory has not yet been confirmed. It is also incorrect to state that BS 4142 acoustic-character corrections were not considered. **ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]**, Section 3.8 and Table 3.16, expressly considers tonality, impulsivity, intermittency and other distinctive characteristics. A 0 dB correction was applied based on the anticipated source characteristics and their predicted perceptibility at receptors. The Applicant accepts, however, that this conclusion must be confirmed using the final plant data, including its frequency spectrum and acoustic character. Operational noise is controlled through the **Outline OEMP [REP1-060]** and secured by Requirement 14 of the **Draft**

ID	Theme	Comments/Issues Raised	Applicant's Response
			DCO [REP1-014]. The final equipment, layout and mitigation must therefore be selected and verified as capable of complying with the secured receptor noise requirements.
WR-BEPS-105	Noise and Vibration	The August 2026 NPPF P3 provides additional relevant context. It requires adverse noise impacts to be mitigated and reduced to a minimum and specifically requires maintenance of the character of tranquil areas valued because they remain relatively undisturbed by human noise.	The Applicant acknowledges that the August 2026 NPPF has restructured and, in some respects, clarified the national decision-making policies concerning living conditions and pollution. However, the Applicant does not consider that it materially changes the established policy approach to the assessment of noise. Policy P3 continues to require adverse noise effects to be mitigated and reduced to a minimum, significant observed adverse effects to be avoided, and the character of tranquil areas to be maintained. For this nationally significant infrastructure project, the relevant National Policy Statements remain the primary policy framework, with the NPPF considered where relevant. The Scheme's operational noise assessment takes account of the quiet rural baseline, and adverse noise effects have been avoided and reduced through the design and mitigation measures identified in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**.
WR-BEPS-106	Noise and Vibration	For East Pye that means the assessment cannot be reduced to whether residential façade values fall below a numerical threshold. Changes to a presently quiet rural acoustic environment, PRoWs, outdoor amenity and ecologically sensitive receptors remain relevant to the character and	The Applicant agrees that the assessment is not confined to compliance with numerical limits at residential façades. The Environmental Statement considers the existing acoustic environment and effects on residential receptors and Public Rights of Way. The Applicant does not, however, agree that the identified effects demonstrate a fundamental incompatibility with the receiving environment. Operational noise has been assessed

ID	Theme	Comments/Issues Raised	Applicant's Response
		quality of the receiving environment. ExQ1 indicates that detailed noise questions will follow, so BEPS reserves further comment until those questions and the Applicant's responses are available. The proper conclusion is therefore stronger than that the Applicant should secure better noise controls. The evidence shows a development which is acoustically dependent upon substantial engineered mitigation simply to reduce operational effects, while construction still produces night-time SOAEL exceedances and Major Adverse effects at numerous homes. That combination is evidence of a fundamental incompatibility between the proposed infrastructure and the acoustic environment in which it has been placed. It is too close to homes and areas of ecological sensitivity.	using representative plant data, and the mitigation necessary to achieve the assessed outcomes forms an integral part of the Scheme. The applicable BESS, other plant and Public Rights of Way noise controls are contained in **Outline OEMP [REP1-060]** and are secured through Requirement 14 of the **Draft DCO [REP1-014]**. For construction, the Applicant acknowledges that the reasonable worst-case assessment predicts temporary night-time HDD effects above the SOAEL at certain receptors, including Major Adverse effects before site-specific mitigation. Those predictions do not establish that such effects would be permanent or incapable of mitigation. Works outside standard hours that are anticipated to generate significant noise effects are subject to the controls in **Outline CTMP [REP1-068]**, including the commitment to seek section 61 consent.
WR-BEPS-107	Noise and Vibration	Where major electrical infrastructure requires extensive barriers, restricted operating regimes and future equipment	The Applicant does not agree that reliance on mitigation demonstrates that the Scheme is fundamentally incompatible with its location. The assessment appropriately considers the Scheme as mitigated: measures such as quieter equipment

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		selection to approach acceptability, and significant disruptive construction noise remains even after mitigation assumptions are applied, the Applicant has not demonstrated that the development can be accommodated at this location without unacceptable effects. Chapter 12 therefore weighs materially against consent and reinforces the wider conclusion that the Scheme has been fitted into a location which lacks the environmental capacity to accommodate it.	selection, operational controls, plant orientation, acoustic enclosures and barriers form integral parts of the proposed design, rather than optional measures applied to an otherwise fixed design. Operational noise is controlled through **Outline OEMP** [**REP1-060]**, including separate requirements for the BESS and other electrical infrastructure. The detailed OEMP must be substantially in accordance with the **Outline OEMP [REP1-060]** and is secured by Requirement 14 of the **Draft DCO [REP1-014]**. Final equipment selection, layout and mitigation must therefore achieve the secured operational noise controls.
WR-BEPS-108	Air Quality	The Applicant has not produced a sufficiently representative or receptor-specific evidential basis for concluding that construction and decommissioning effects will be negligible or not significant across a geographically dispersed rural NSIP.	The Applicant refers to its responses provided under comment ID BEPS-370 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-109	Air Quality	The first weakness is the baseline. The Applicant undertook no Scheme-specific monitoring and states that existing data are sufficient. Yet seven of the eight diffusion-tube locations relied upon	The Applicant refers to its responses provided under comment ID BEPS-369 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

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		are in the traffic-heavy town of Long Stratton on the A140, and the only continuous indicative monitor used for NO2, PM10 and PM2.5 is also beside the A140 in Long Stratton. Most of East Pye would instead be constructed across low-traffic countryside, villages, hamlets and minor rural roads. The Applicant's own figures demonstrate the mismatch: the 2024 annual mean NO2 concentration at the selected A140 roadside monitor was 23.7 µg/m³, while DEFRA-modelled backgrounds across much of the Order Limits are only approximately 5.4–6.3 µg/m³. The measured and modelled environments are therefore materially different.	
WR-BEPS-110	Air Quality	The Long Stratton evidence also has temporal limitations. Much of the diffusion-tube dataset predates completion of the bypass and therefore reflects the town's former A140 through-traffic environment. The Zephyr monitor commenced only in August 2024; its 2024 dataset had 40% capture, and the	The Applicant refers to its responses provided under comment ID BEPS-369 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		2025 data are not separated into pre- and post-bypass periods. The Applicant consequently has no measured validation of the much lower background concentrations assumed at the rural receptors most exposed to new construction traffic.	
WR-BEPS-111	Air Quality	The Applicant consequently has no measured validation of the much lower background concentrations assumed at the rural receptors most exposed to new construction traffic.	The Applicant refers to its responses provided under comment ID BEPS-369 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-112	Air Quality	That deficiency matters because Chapter 13 relies heavily on the EPUK/IAQM traffic screening criteria rather than receptor-specific dispersion modelling. The Applicant's own Appendix describes the thresholds of 500 LDV AADT and 100 HDV AADT outside an AQMA as indicative criteria for deciding whether detailed assessment should be undertaken. Yet where Scheme traffic remains below those thresholds, Chapter 13 simply accepts the resulting pollutant change as less than 0.5% of the	The Applicant refers to its responses provided under comment ID BEPS-370 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		relevant objective and therefore negligible. No receptor-specific NO2, PM10 or PM2.5 concentration is calculated.	
WR-BEPS-113	Air Quality	The cumulative assessment exposes the weakness more clearly. Table 13.12 predicts cumulative construction increases of 1,387 AADT including 806 HDVs on A140 Link 01, 1,313 AADT including 806 HDVs on Link 03, and 1,160 AADT including 806 HDVs on Link 21. Those HDV increases are more than eight times the Applicant's own 100-HDV screening threshold. Chapter 13 expressly acknowledges that the criteria are exceeded on all three links, but still undertakes no quantitative dispersion modelling. Instead, the Applicant concludes that cumulative effects are not significant because East Pye Solar contributes only part of the total traffic, historic Long Stratton monitoring remains below statutory objectives, future vehicle emissions are expected to improve, construction is temporary and traffic will be managed	The Environmental Protection UK (EPUK) & Institute of Air Quality Management (IAQM) guidance states that the screening criteria are not intended to be applied rigidly, that they can be amended based on professional judgement and that their main purpose is to identify situations where there is a possibility of an impact on local air quality. Therefore, an exceedance of the screening criteria does not automatically necessitate dispersion modelling. The overall conclusion of effect resulting from road traffic emissions at human receptors takes into several factors listed in paragraph 13.5.25 of **ES Volume 1, Chapter 13 – Air Quality [APP-049]** including whether or not an air quality objective is likely to be exceeded. These factors have been considered in the conclusion of effects, including cumulative effects in **ES Volume 1, Chapter 13 – Air Quality [APP-049]**.

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		through the CTMP. That creates an internal methodological inconsistency: below the screening thresholds, the effect is declared negligible without modelling; substantially above the thresholds, modelling is still not undertaken and qualitative reasoning is substituted instead. The screening methodology therefore appears incapable of triggering the detailed assessment it was designed to identify.	
WR-BEPS-114	Air Quality	Construction dust is similarly dependent upon mitigation rather than demonstrated low inherent risk. Chapter 13 identifies earthworks, construction and trackout as presenting a 'high risk' of dust impacts—the highest IAQM risk category—but then scopes the pathway out because CEMP, OEMP and DEMP measures are assumed to reduce the effects to not significant. That approach is only as robust as the controls on which it depends. For a Scheme involving numerous Sites, cable routes, compounds, haul roads and extensive soil disturbance, the	The construction, operational and decommissioning dust assessment methodology presented **in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]** is in accordance with Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction. The guidance assumes that effective mitigation is secured by planning conditions, legal requirements or required by regulations. The effects of dust emissions resulting from the Scheme are mitigated through the **Outline CEMP [REP1-058]**, **Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. Detailed versions of these management plans are secured by Requirements 13, 14 and 21 of the **Draft DCO [REP1-014].** The mitigation secured through these management plans is sufficient to ensure that effects resulting from dust emissions

ID	Theme	Comments/Issues Raised	Applicant's Response
		Examination should therefore scrutinise the secured monitoring locations, PM10 and PM2.5 controls, trigger levels, intervention requirements, trackout measures, dry-weather controls and enforcement arrangements rather than treating the existence of an outline management plan as sufficient.	will not be 'significant'. The detailed management plans must substantially be in accordance with the outline management plan and approved by the relevant authorities.
WR-BEPS-115	Air Quality Ecology and Biodiversity	This has an ecological dimension as well as a human-health one. Natural England identified SSSIs including Sexton Wood, Flordon Common, Hedenham Wood and Tindall Wood as potentially sensitive to construction traffic and dust, while Norfolk Wildlife Trust also identified construction-related air-quality effects on habitats and species. Those receptors require the mitigation relied upon to be effective and enforceable.	Road traffic emission impacts on ecological sites, including SSSIs, have been assessed in **ES Volume 1, Chapter 13 – Air Quality [APP-049]**. Construction, operational and decommissioning dust impacts have been assessed in **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]**. The significance of air quality effects on ecological sites is determined to be not significant in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and therefore additional mitigation is not required. However, the following embedded mitigation measures will minimise air quality impacts on ecological sites: • Routing of construction traffic, which will avoid sensitive areas including designated sites, set out in the **Outline CTMP [REP1-068]**. • Measures to minimise vehicle trips associated with the Scheme in the **Outline CTMP [REP1-068]** and **Outline OTMP [APP-202]**.

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			• Dust mitigation measures set out in the **Outline CEMP [REP1-058]**, the **Outline OEMP** [**REP1-060]** and the **Outline DEMP [REP1-062]**. Detailed versions of the above management plans are secured through the **Draft DCO [REP1-014]**.
WR-BEPS-116	Air Quality	PM2.5 requires particular caution. UKHSA advised that particulate matter and nitrogen oxides are non-threshold pollutants and that health benefits arise from reducing exposure even below statutory standards. NCC Public Health likewise advised that vulnerable populations should be considered within the construction-dust assessment. Chapter 13 acknowledges DEFRA's PM2.5 interim target of 10 µg/m³ and its planning guidance, but its assessment remains focused principally on compliance and screening thresholds. In a rural area where modelled background PM2.5 is generally only around 5.6–6.2 µg/m³, the relevant question is not simply whether the statutory limit is exceeded but whether avoidable additional exposure has been minimised.	The Applicant refers to its responses provided under comment ID BEPS-376 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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WR-BEPS-117	Air Quality	Other emission pathways remain similarly conditional or deferred. PINS agreed to scope NRMM emissions out only if the ES supplied sufficient information on machinery type, number, location and operating hours; Chapter 13 does not clearly demonstrate where all four elements have been provided. More significantly, PINS originally allowed operational combustion emissions to be scoped out because the Applicant stated that no combustion plant was proposed. The final Scheme now allows a backup diesel generator of up to 500 kVA at the National Grid substation. Its specification and emissions are not fixed, yet Chapter 13 declares the effect not significant on the basis of expected infrequent operation, distance to receptors and possible later mitigation such as stack-height increase or SCR. The factual premise on which the original scope-out was granted has therefore changed.	The Applicant refers to its responses provided under comment ID BEPS-371 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-118	Air Quality	Replacement activity is also treated largely by assumption.	Effects of operational road traffic emissions have been scoped out of **ES Volume 1, Chapter 13 – Air Quality [APP-**

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		Solar panels may be replaced extensively and BESS components repeatedly during the 60-year operational period, yet traffic and dust from those phases are screened out on the basis that they are expected to remain below generic thresholds. A transparent maximum replacement scenario has not been provided.	**049].** However, forecast vehicle trips during the Solar PV panel and BESS replacement are provided in the **Outline OTMP [APP-202]** and confirm that they do not exceed the EPUK & IAQM guidance screening criteria. The forecast vehicle trips resulting from operational replacement activities are based on a reasonable worst-case scenario assuming replacement activities occur across all sites simultaneously. The maximum level of risk (high risk) in accordance with IAQM guidance has been assigned to dust generating BESS and solar PV panel replacement activities during the operational phase. Mitigation measures to control emissions of dust during replacement activities are provided from the 'high risk' category in the **Outline OTMP [APP-202]**. Therefore, it is considered that a reasonable worst-case assessment has been undertaken for both road traffic and dust impacts during operational BESS and solar PV panel replacement.
WR-BEPS-119	Air Quality	The decommissioning assessment is more assumption-dependent still. PINS expressly refused to allow decommissioning air-quality effects simply to be scoped out. The final ES nevertheless assumes that decommissioning traffic will not exceed construction traffic, that the duration will be similar, that background concentrations will fall, that future	It is considered appropriate to assume that vehicle emissions and background pollutant concentrations will reduce over the 60-year lifetime of the Scheme due to Government policy and legislation, and these assumptions are also built into tools used for quantitative air dispersion modelling assessments. Given the nature of activities involved during decommissioning, it is reasonable to assume that these will be similar in scale to construction given the outline information available at this stage. Requirement 21 of the **Draft DCO [REP1-014]** requires a detailed Decommissioning

ID	Theme	Comments/Issues Raised	Applicant's Response
		vehicles and machinery will be cleaner and that significant below-ground and grid infrastructure will remain in situ. Dust is treated on the basis that because construction already falls within the maximum IAQM 'high risk' category, decommissioning 'can be no worse'. None of that constitutes a quantified decommissioning scenario.	Environmental Management Plan to be prepared, and this will consider detailed decommissioning activities, once known. The decommissioning dust risk assessment presented in **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]** has been undertaken in accordance with best guidance produced by the IAQM. The IAQM guidance adopts a qualitative approach to assessment of dust impacts taking into account the magnitude of the dust source, the effectiveness of the pathway and the sensitivity of receptors. The maximum level of mitigation to minimise dust impacts during decommissioning from the IAQM guidance are included in the **Outline DEMP [REP1-062]**.
WR-BEPS-120	Air Quality	The air-quality objection is therefore not that BEPS has proved exceedance of statutory NO2, PM10 or PM2.5 objectives. It is that Chapter 13 has not demonstrated with sufficient evidential robustness that effects are negligible or not significant at the receptors actually affected. The weaknesses are cumulative: the measured baseline is concentrated in a materially different Long Stratton traffic environment; the rural baseline remains unvalidated; sub-	The Applicant refers to its responses to WR-BEPS-108 - 119.

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		threshold traffic is automatically translated into negligible effects without dispersion modelling; cumulative traffic substantially exceeds the Applicant's own screening thresholds without triggering quantitative assessment; high-risk dust effects depend upon future management; a new diesel generator is assessed without a defined emissions specification; and decommissioning conclusions rest on assumptions extending approximately six decades into the future.	
WR-BEPS-121	Air Quality	The new NPPF P3 supersedes the former paragraph references relied upon when the WR was drafted. It expressly requires cumulative pollution effects on health, living conditions and the natural environment to be considered, requires unacceptable air-pollution effects to be avoided or mitigated, and specifically refers to compliance with PM2.5 objectives. That reinforces BEPS's existing point that formal compliance with national objectives is not the whole assessment where the Applicant's	The Applicant refers to its responses provided under comment ID BEPS-376 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
		own traffic and construction screening criteria indicate circumstances in which receptor-specific effects warrant closer examination. The Applicant's 'not significant' conclusion therefore deserves limited weight unless it is supported during Examination by a representative rural baseline, receptor-specific dispersion modelling where its own screening thresholds are exceeded, clearly secured dust and PM2.5 controls, a defined assessment of the backup generator and a quantified worst-case envelope for replacement and decommissioning.	
WR-BEPS-122	Socio-Economics	Chapter 14 materially overstates the certainty of the Scheme's economic benefits while failing to establish an adequate baseline for the local businesses potentially exposed to adverse effects. This is not a minor omission. South Norfolk Council expressly required the socio-economic assessment to address effects and disruption to local businesses during both	The Applicant refers to its response provided under comment ID BEPS-398 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
		construction and operation, together with cumulative effects arising from other major infrastructure. It specifically identified South Norfolk's market towns, historic churches, the Waveney Valley, Boudicca Way, museums, walking and cycling routes, accommodation and visitor venues as forming a substantial tourism and visitor economy requiring assessment. The final BEPS Written Representation accordingly identifies the narrow tourism assessment, inadequate treatment of local businesses, fragmented rural-economy analysis and absence of adequate cumulative assessment as distinct defects in Chapter 14.	
WR-BEPS-123	Socio-Economics	The most basic deficiency is that the Applicant has not established the local-business receptor. It does not identify and quantify the businesses within the affected villages and rural area which may be exposed to construction traffic, access restrictions, noise, landscape change, PRoW disruption or the long-term	With respect to adverse impacts on local businesses, the Applicant refers to its response provided under comment ID BEPS-398 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. Regarding supply chain benefits to local businesses, 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**

ID	Theme	Comments/Issues Raised	Applicant's Response
		industrialisation of the countryside. There is no sufficiently resolved business baseline showing the number, location, type, dependency or sensitivity of potentially affected enterprises. Without that information, there is no evidential basis for concluding that adverse business effects will be negligible or not significant. Suffolk and Mid Suffolk's scoping evidence specifically required a proper baseline, identification of businesses capable of participating in the local supply chain, phase-specific analysis and evidence-led assessment of both positive and negative socio-economic effects. They considered the Applicant's original methodology insufficient and required 'a complete revision'. This deficiency is particularly serious because the local economy is not confined to conventional retail premises. A substantial part of South Norfolk's economic offer depends upon the qualities of the place itself: rural landscape, tranquillity, historic	**[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 considers that this represents a robust and proportional approach to realising supply chain benefits in local communities.

ID	Theme	Comments/Issues Raised	Applicant's Response
		villages and churches, walking and cycling routes, wildlife, countryside recreation and visitor accommodation. South Norfolk Council expressly identifies this combination as a 'rich tourism/visitor offer'. Businesses whose trade depends directly or indirectly upon those qualities may include accommodation providers, hospitality businesses, rural visitor attractions, leisure and recreational enterprises and other businesses whose customers come to experience the countryside. The Applicant cannot assess their vulnerability merely by counting hotel rooms or considering whether construction workers might spend money in local shops.	
WR-BEPS-124	Socio-Economics	The original scoping approach illustrates the problem. The Applicant assumed that adverse effects on shops would not arise, treated the small operational workforce as producing only a minor benefit, and redirected wider amenity effects to the landscape, transport and noise chapters	The Applicant refers to its response provided under comment ID BEPS-394 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		rather than considering their economic consequences. That fragmentation is precisely what prevents a proper socio-economic assessment. A landscape effect may simultaneously be a tourism effect; a PRoW closure may affect recreational use and the businesses serving it; construction traffic may discourage visitors or impede access; noise may affect accommodation or leisure premises; and the cumulative industrialisation of the countryside may alter the attractiveness of the area over the whole operational life of the Scheme. Those economic consequences do not disappear because their physical causes are assessed in another ES chapter.	
WR-BEPS-125	Socio-Economics	The temporal scope is also too narrow. The potential effect on local businesses is not confined to the construction phase. East Pye is proposed for up to 60 years. The Applicant's own landscape assessment accepts substantial and, in places, continuing Significant landscape change. The	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** considers impacts during the Operation and Maintenance phase of the Scheme, including assessment of a worst-case peak replacement scenario. No significant adverse effects are identified.

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		transport and PRoW chapters identify recurring disruption during construction, replacement and decommissioning. The heritage assessment identifies changes to historic rural settings. The socio-economic assessment should therefore examine whether businesses dependent upon landscape quality, rural recreation, heritage, tranquillity, walking, cycling, nature and the broader visitor economy may suffer a long-term change in demand or competitiveness. South Norfolk Council expressly required business effects to be assessed during operation as well as construction. The failure to quantify the businesses at risk means that this question has never been answered.	
WR-BEPS-126	Socio-Economics	The asymmetry with the Applicant's treatment of benefits is striking. Construction employment is modelled numerically, with an average and peak workforce, indirect employment and claimed net job creation. Yet adverse impacts on existing businesses	The Applicant refers to its response provided under comment ID BEPS-398 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The Applicant considers the approach taken to be proportionate. Benefits relating to construction employment (direct and indirect) are estimates and are referred to as such in **ES Volume 1, Chapter 14 – Socio-Economics [APP-**

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		are not subjected to an equivalent exercise. There is no count of potentially affected enterprises, no estimate of employment supported by them, no assessment of turnover exposure, no visitor-behaviour evidence, no business survey, no analysis of sensitivity to landscape or access change and no quantified estimate of possible displacement. The positive case is therefore expressed in numbers while the negative local-economic case is largely removed by assumption. Even the claimed benefits are uncertain. The Applicant forecasts a substantial temporary construction workforce, but the proportion of jobs actually accessible to South Norfolk residents remains limited and unverified. The Outline Employment, Skills and Supply Chain Strategy contains no binding local-employment percentage or secured local procurement outcome. Suffolk County Council specifically required phase-specific workforce	**050]**, but are more readily quantified than other benefits or adverse effects. Whilst – for example – providing a count of enterprises which may be adversely affected is not possible, adverse consequences are given due consideration in the ES chapter.

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		and supply-chain evidence and probability-based analysis because gross job creation does not establish local net benefit. The result is that the Applicant seeks positive weight for economic benefits that are temporary and incompletely secured while failing to quantify the existing businesses which may bear the adverse consequences.	
WR-BEPS-127	Socio-Economics	Temporary accommodation compounds the problem. A large externally sourced workforce may increase demand for hotels, B&Bs, holiday lets and private rentals, but contractor occupation is not necessarily equivalent to tourism benefit. It may displace leisure visitors during peak periods, alter accommodation availability and change the customer base on which associated hospitality and visitor businesses depend. Earlier BEPS analysis identified the absence of visitor or business surveys, visitor-behaviour analysis, tourism-specific stakeholder evidence and	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 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.

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		assessment of booking displacement or seasonal effects.	
WR-BEPS-128	Socio-Economics	The cumulative position is equally material. South Norfolk Council has expressly warned that the concentration of NSIP solar, grid and other major infrastructure may create economic consequences for local businesses and tourism, with overlapping construction periods worsening the effect. A rural business dependent upon visitors does not experience East Pye, Norwich to Tilbury and other infrastructure projects as separate planning files; it experiences the combined change in traffic, landscape, tranquillity, accessibility and visitor perception.	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** assesses cumulative effects, drawing on the list of cumulative schemes in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]**. This includes consideration of how many of the cumulative schemes are also energy schemes and the extent of overlap in construction periods. No significant adverse effects are identified.
WR-BEPS-129	Socio-Economics	The proper conclusion is therefore substantially stronger than that Chapter 14 merely reduces the weight to be given to claimed economic benefits. The Applicant has not established the adverse side of the socio-economic balance at all. It has not identified the full population of potentially affected local businesses, quantified their economic	The Applicant refers to its response to WR-BEPS-126.

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		contribution, established which depend upon tourism, countryside, heritage, recreation or environmental quality, or assessed how 60 years of landscape industrialisation and recurring construction-related disturbance may affect their viability. In the absence of that baseline, a finding of negligible or non-significant local-business harm is not an assessment conclusion; it is an unsupported assumption. That omission is material to the overall planning balance. The Scheme's claimed employment benefits are temporary, substantially dependent on non-local labour and not secured at the level claimed, while the potential adverse effects fall upon existing South Norfolk businesses embedded in the rural economy and may persist throughout the operational life of the Scheme. The ExA cannot properly weigh speculative construction benefits against adverse economic effects which the Applicant has never quantified. **Until the local-**	

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		business and tourism economy has been identified and assessed as a receptor in its own right—including long-term operational, cumulative and cross-topic effects—the Applicant has not demonstrated that East Pye would produce a net socio-economic benefit or even that its adverse local economic effects are not significant. Chapter 14 therefore represents a substantive gap in the case for consent, not merely a reason to reduce the weight given to one claimed benefit.	
WR-BEPS-130	Soils and Agricultural Land	The agricultural impact is substantially greater than generic references to a 'temporary' solar use imply. The detailed surveys identify 397.4 ha of Grade 2 and 431.7 ha of Grade 3a land: 829.1 ha of surveyed Best and Most Versatile agricultural land. Work No. 1 alone contains approximately 470 ha of BMV land, while approximately 158.9 ha of the Cable Route Corridor remains unsurveyed. The WR also records up to 28.9 ha of	The breakdown of agricultural land to be disturbed is provided in Table 15.14 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. ES Chapter 15 explains that the installation on solar panels across agricultural land does not adversely affect the grading of the land. The Cable Route Corridor (CRC) will be subject to soil surveys to record soil physical characteristics such as horizon depth, texture and ALC grade prior to construction as set out in the **Outline SRMP [APP-204]**. The ALC of the CRC will be undertaken pre-construction, once the cable route has been refined to a specific alignment within the CRC. The deferral of ALC and soil surveys in cable route corridors has been

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		permanent BMV loss, rising to 37.9 ha when relevant mitigation planting is included, with that worst-case loss itself treated as significant.	accepted by Natural England and the Secretary of State on other solar NSIPs. For example: 1. EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the CRC survey can be controlled under the DCO; 2. EN010123 Heckington Fen where the SoS decision letter at 4.23 refers to the final SoCG with NE [REP5-048] in which agreement to a post DCO soil survey including ALC was reached. 3. EN010170 Green Hill where the ExA report at 3.3.5 notes that ALC of the CRC will be completed post-consent. Natural England's initial position was that an ALC of the CRC was required [REP1-182], but the Statements of Common Ground considered that the assessment was appropriate and proportionate, with ALC of the CRC held for post-DCO survey. 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]**.

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			The permanent effects upon agricultural land both with and without including the relevant planting have been assessed within ES Chapter 15 at Section 15.10 as being significant. Temporary effects are of low magnitude and as such have not resulted in a significant effect.
WR-BEPS-131	Soils and Agricultural Land	The central methodological defect is that reversibility is assumed rather than demonstrated. This is particularly serious because the soils are not inherently robust, freely draining soils. The Applicant's own baseline identifies predominantly Beccles 1 soils comprising 'slowly permeable, seasonally waterlogged fine loamy over clayey soils'. Across Sites 1, 2 and 8, topsoils are predominantly clay or clay loam over clay or clay-loam subsoils; across Sites 3, 4, 5, 6 and 7 the subsoils are described as generally poorly structured and slowly permeable. The same scoping material nevertheless asserted that these soils are 'generally resilient to being handled' and that adverse effects at decommissioning would be capable of rectification using 'normal agricultural land	Soils have been mapped historically by the Soil Survey of England and Wales (SSEW). SSEW found that the majority of the soils within the OL belong to the Beccles 1 association, other areas within the OL belong to the Burlingham 1 association. Beccles 1 soils are described as slowly permeable, seasonally waterlogged, fine loamy over clayey soils. Burlingham 1 soils are described as deep coarse and fine loam soils with slowly permeable subsoils and slight seasonal waterlogging. The detailed **Agricultural Land Classification [APP-182]** found that the soils within the Order Limits (OL) largely follow what the SSEW found, except that a lot of the clayey soils were found to be lighter. A general break down of the textures found within the OL is provided in Section 7 of the Agricultural Land Classification. The sensitivity of the soils has been based on the ISEP guide 'A New Perspective on Land and Soil in Environmental Impact Assessment' which takes into account the climate and the sensitivity to damage, the sensitivity of the soils is provided in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. No soils within the OL are considered to be of high sensitivity.

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		management machinery'. That assertion requires evidence. It cannot safely be treated as a soil-science fact.	Restoring the land back to a comparable ALC grade at the decommissioning stage is considered throughout ES Chapter 15 and within the **Outline SRMP [APP-204]**. Soil structure can and is managed through the use of standard agricultural machinery. Removing compaction can be done using subsoilers or tines. Soil structure can be improved through the use of disk cultivators, power harrows or other light tillage methods. Processes involved in restoring the land back to a comparable ALC grade will be refined within the detailed SRMP which is secured by requirement 18 of the **Draft DCO [REP1-014]**.
WR-BEPS-132	Soils and Agricultural Land	The Welsh Government's 2023 Soils Policy Evidence Programme: The Impact of Solar Photovoltaic Sites on Agricultural Soils and Land Quality provides directly relevant technical evidence. Although Welsh planning policy is not determinative in England, the underlying soil-science evidence concerns the same Agricultural Land Classification system and the physical behaviour of agricultural soils under solar development. Its review concludes that soil texture materially affects resilience: light-textured soils have greater resilience to structural damage, whereas heavy soils containing	The Welsh Government research referred to concluded that it is important to carry out good soil management to minimise and avoid adverse effects. The **Outline SRMP [APP-204]** has been developed to help guide good practice and minimise potential effects on soils and agricultural land quality. The SRMP, which is required by DCO requirement 18 of the **Draft DCO [REP1-014]**, will follow the principles of the outline SRMP. The Welsh Government's findings set out that solar sites are reversible and soil management plans mitigate the risk of damages to soils. A detailed SRMP will be completed to incorporate handling techniques, soil suitability tests and decommissioning measures. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** explains that compaction will be ameliorated

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		more than 27% clay have 'low resilience to damage'; trafficking or handling them in unsuitable conditions can readily damage soil structure. That finding is directly relevant to East Pye's clay and clay-loam, slowly permeable and seasonally waterlogged soil resource. More importantly, the Welsh Government evidence demonstrates that restoration to the original BMV grade cannot simply be presumed. It records that knowledge of natural recovery from compaction remains 'partial and incomplete'. It also records the MAFF ALC guidance that significant compaction below 35 cm may be 'difficult or impossible to ameliorate practically or economically' and therefore constitutes a long-term limitation. The Welsh Government's modelling demonstrates the potential agricultural consequence in ALC terms. Where compaction creates an introduced slowly permeable layer, pre-development BMV land can remain downgraded	during the construction phase and during the decommissioning phase. There will be no requirement for heavy machinery to traffic soils during the operation and maintenance phase except during periods of ad hoc replacement of infrastructure. As such there will likely be no compacting of soils and the combination of increasing organic matter levels and lack of machinery activity will allow a natural enhancement of the soil.

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		at decommissioning. Its scenarios include Grade 3a becoming Grade 3b, Grade 2 becoming Grade 3b and, in more severe wetness conditions, Grade 3a becoming Grade 4. The report concludes that unremediated compaction can lead to gleying and a new slowly permeable layer, with consequent loss of BMV land or loss of its versatility; it also finds that compaction can reduce plant-available water and, in severe cases, restrict root penetration sufficiently to cause downgrading by more than one ALC grade. That evidence is particularly important because East Pye is not exposed to a single construction event. The soil resource may be subjected successively to initial construction traffic, piling, trenching, haul roads, compounds and cable installation; operational maintenance and mowing; complete or extensive panel replacement; repeated BESS and electrical-infrastructure replacement; and finally decommissioning and restoration.	

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		The Applicant therefore needs to demonstrate recovery not from one carefully controlled intervention, but from a sequence of disturbance over a whole 60-year period.	
WR-BEPS-133	Soils and Agricultural Land	The Welsh Government evidence expressly identifies machinery trafficking as a key determinant of compaction and warns that remediation success depends on soil strength, moisture content and depth of damage. It also concludes that soil compaction from machinery can have a residual effect on land, and that compaction and soil mixing can create continuing land-management problems after solar infrastructure is removed. That sits uneasily with any assumption that East Pye's soil condition can simply be restored using conventional agricultural machinery at the end of the Scheme, let alone any sense that it might be 'improved' by this infrastructure.	The Applicant notes this comment and refers to its response provided under Comment ID WR-BEPS-132.

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WR-BEPS-134	Soils and Agricultural Land	The empirical evidence cited by BEPS points in the same direction. The 2025 Carvalho et al. UK solar-farm study recorded mean bulk density approximately 14–15% higher beneath panels, soil organic carbon around 9% lower and particulate organic matter approximately 29% lower. That study does not prove the precise outcome at East Pye, but it further demonstrates that long-term soil neutrality beneath operational solar infrastructure cannot safely be assumed.	NPS EN3 2025 sets out that solar farms have the potential to increase biodiversity values of sites which can result in significant wider environmental benefits and enhancements. The paper 2025 Carvalho et al paper compares land under panels to permanent pasture; there is no consideration given to arable land. Soils, in respect of carbon levels within the soil, will benefit from being in long term grassland compared to arable. It is not clear from the research paper whether different height panels were included in the research, many older panel designs are very low to the ground at the lower edge leading to significant areas of shading. Plant growth under newer panel designs is not significantly impeded as is shown in Plate 15.54 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**.
WR-BEPS-135	Soils and Agricultural Land	The existing agricultural function must also be properly characterised. Land within the Order Limits which is currently, or has recently been, managed through the Countryside Stewardship Scheme (many of the solar fields) cannot be treated as 'industrially farmed' land awaiting environmental enhancement. It is productive agricultural land performing deliberately funded ecological functions, including management for ground-nesting	Five of the farm businesses within Sites 1 – 10 and the BESS are involved in Countryside Stewardship, as outlined in **ES Volume 3, Appendix 15.2 – Farm Reports [APP-183]**. As is noted in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** the majority of the land within the Order Limits (OL) is used for large-field arable farming. Parts of the OL are used for agri-environmental farming, biofuels and grassland farming. As shown in the **Biodiversity Net Gain Report [APP-218]** the scheme will provide a net benefit for the biodiversity in

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		and other red-listed farmland birds such as lapwing and skylark and habitat relevant to turtle dove. Conversion to fenced tracker arrays and generic under-panel grassland is not evidence that those existing agricultural and ecological functions will continue.	accordance with NPS Policy EN-1, including an increase of 37.42% for habitat. 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].** NPS Policy EN-3 states that *"Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed"* as explained in ES Chapter 15, the majority of the OL is intensively managed arable land.
WR-BEPS-136	Soils and Agricultural Land	Natural England's concerns reinforce the point. It has required complete ALC coverage, consideration and avoidance of peat, greater avoidance of permanent infrastructure on BMV land and sufficiently robust soil-management controls. PINS likewise required ALC survey evidence to inform final design and micrositing, including the location of BESS infrastructure, and required land take for solar arrays, cable routes, tracks, substations	The results of the detailed ALC survey of the order limits excluding the CRC can be found in Table 15.6 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The full detailed ALC report can be found in **ES Volume 3, Appendix 15.1- Agricultural Land Classification [APP-182]**. Across Sites 1 – 10 and the BESS 829.1 ha of Best and Most Versatile (BMV) land has been found. Under the new Predictive ALC Map for England, approximately 94% of Norfolk's agricultural land is BMV, so the OL is not unusually high in BMV. The Cable Route Corridor (CRC) will be subject to soil surveys to record soil physical characteristics such as horizon

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		and mitigation to be identified separately. South Norfolk Council records that approximately 80% of the surveyed land is Grade 2 or 3 and has expressly raised the immediate and cumulative loss of BMV land over the Scheme's 60-year life as a matter of concern.	depth, texture and ALC grade prior to construction as set out in the **Outline SRMP [APP-204]**. The ALC of the CRC will be undertaken pre-construction, once the cable route has been refined to a specific alignment within the CRC. The deferral of ALC and soil surveys in cable route corridors has been accepted by Natural England and the Secretary of State on other solar NSIPs. For example: 1. EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the CRC survey can be controlled under the DCO; 2. EN010123 Heckington Fen where the SoS decision letter at 4.23 refers to the final SoCG with NE [REP5-048] in which agreement to a post DCO soil survey including ALC was reached. 3. EN010170 Green Hill where the ExA report at 3.3.5 notes that ALC of the CRC will be completed post-consent. Natural England's initial position was that an ALC of the CRC was required [REP1-182], but the Statements of Common Ground considered that the assessment was appropriate and proportionate, with ALC of the CRC held for post-DCO survey. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The micro-siting of elements within the design has in part been

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			driven by the land quality, but that is only one of many considerations. It is not practical to micro-site all elements of the scheme to avoid land of BMV quality. Three developments were assessed for cumulative impacts. These were identified from a long list which was refined following consultation with the relevant Local Planning Authorities. The three assessed developments are: 1. EN0110010 High Grove Solar Farm 2. EN0110013 The Droves Solar Farm 3. EN0110019 EcoPower Suffolk Solar These three cover a total of 3,073 ha of agricultural land. Together with East Pye of the order of 4,100.5 ha of agricultural land is involved. It is concluded from these three developments that there is the potential for permanent land take to exceed 20ha of BMV which would result in a moderate adverse effect which would be significant in EIA terms. The effect on food production and on the wider economy is concluded to be not significant. The area of agricultural land in Norfolk is about 417,633ha (Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**). The three schemes together

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			with the Scheme would involve of the order of 4,100 ha which is 1% (0.98%) of the agricultural area of the County. To put this in context, currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) of Norfolk is not being cropped. The effect on food production and the related rural economy, with or without continued agricultural production from sheep grazing, is not significant on a local, county, regional or national basis.
WR-BEPS-137	Soils and Agricultural Land	The decisive issue is therefore not whether some form of agricultural use might theoretically resume after decommissioning. It is whether this particular Grade 2 and Grade 3a heavy-clay soil resource can be demonstrated to return to its existing Agricultural Land Classification after six decades of repeated disturbance and no agricultural use, or even grazing. The Applicant has not supplied that evidence. There is no East Pye-specific compaction-depth model, no evidence establishing the recovery behaviour of the relevant clay and clay-loam soil series following repeated trafficking and pile removal, no demonstrated recovery timetable, no binding	Decommissioning is outlined in the **Outline SRMP [APP-204]**. The outline SRMP sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014].** The **Outline SRMP [APP-204]** provides the structure and the types of controls to be included within the detailed SRMP. The outline SRMP sets out an outline of the matters that need to be defined or secured. Methodologies for restoration will be provided throughout the detailed SRMP ensuring that no damage is caused to the soils. The restoration will enable the land to be returned back to a comparable ALC grade. Monitoring procedures are outlined in the **Outline SRMP [APP-204]**. The monitoring procedures to be included as a minimum are outlined from paragraphs 4.2.30 to 4.2.35 of the Outline SRMP.

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		requirement that restored land attain its pre-development ALC grade, and no secured long-term monitoring regime capable of requiring further remediation if it does not.	Compaction will be monitored by inspecting the soils following the installation of the piles but prior to the installation of the PV panels, if compaction is found this will be remediated whilst the ground remains accessible. Compaction will be monitored during and after decommissioning works, if compaction is found this will be remediated once ground conditions permit, in line with the detailed SRMP. Any compaction that occurs during the operational phase and decommissioning phase will be remediated following the decommissioning stage. The land will be handed back to the respective landowners following decommissioning. There are no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade.
WR-BEPS-138	Soils and Agricultural Land	That evidential gap is fundamental. The Welsh Government research demonstrates that reversibility depends on soil type, depth of compaction, wetness, handling conditions and the effectiveness of remediation; that heavy clay soils are among the least resilient; and that deep compaction can be practically or economically impossible to reverse. It expressly models circumstances in which BMV land remains downgraded	The Welsh Governments findings set out that solar sites are reversible and soil management plans mitigate the risk of damages to soils. A detailed SRMP will be completed to incorporate handling techniques, soil suitability tests and decommissioning measures, as secured by Requirement 18 of the **Draft DCO [REP1-014].** The **Site Selection Assessment [APP-215]** was undertaken proportionately and in accordance with national planning policy. As set out in the Site Selection Assessment, for the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the search area (not using the new predictive ALC mapping as this was not available at the time). Paragraph 2.10.21 of NPS EN-3 states: '*While land type*

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		after decommissioning. Against that evidence, the Applicant cannot legitimately treat restoration to BMV condition as the default outcome merely because panels and tracks can physically be removed. Chapter 15 therefore presents a site-selection problem as well as a soil-management problem. The August 2026 NPPF N2 now states expressly that development proposals should take into account the quality of agricultural land, including BMV status **and its grade**, and that where significant development of agricultural land is necessary, poorer-quality land should be used where possible.	*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*. Accordingly, the presence of BMV land does not preclude solar development at Stage 2 or thereafter.
WR-BEPS-139	Soils and Agricultural Land	East Pye places one of the largest proposed solar developments in England across extensive Grade 2 and Grade 3a land whose slowly permeable, seasonally wet heavy soils are particularly vulnerable to structural damage. The Applicant then relies upon soil-management measures and eventual restoration over a 60-year period rather than demonstrating why poorer-quality	Under the new Predictive ALC Map for England, approximately 94% of Norfolk's agricultural land is BMV, so the OL is not unusually high in BMV. The **Site Selection Assessment [APP-215]** was undertaken proportionately and in accordance with national planning policy. As set out in the Site Selection Assessment, for the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the search area (not using the new predictive ALC mapping as this was not available at the time).

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		land could not reasonably have been preferred. This is reinforced by the Applicant's own design evolution: agricultural quality was capable of contributing to the exclusion or removal of some land, including Site 6, while extensive BMV land remains within the retained Scheme. The Examination should therefore identify the objective decision rule that determined when BMV quality required avoidance and when equivalent land quality was treated as capable of mitigation.	Paragraph 2.10.21 of NPS EN-3 states: '*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible*. Accordingly, the presence of BMV land does not preclude solar development at Stage 2 or thereafter.
WR-BEPS-140	Soils and Agricultural Land	ExQ1 separately asks whether the outline Soil Resource and Management Plan provides sufficient certainty where further cable-corridor survey, soil characterisation, stockpile arrangements, monitoring and restoration methodologies remain post-consent. The new NPPF therefore strengthens both ends of the argument: poorer-quality land should be preferred where possible at site-selection stage, and the restoration of the high-	The **Outline SRMP [APP-204]** sets out the measures that will be developed in more detail in the detailed SRMP; the production of which is secured through Requirement 18 of the **Draft DCO [REP1-014]**. The outline SRMP provides the structure and the types of controls to be included within the detailed SRMP. The Applicant commits to, ensuring that the works and restoration of any disturbed land does not result in any downgrading of agricultural land quality. All land affected will be kept at, or restored to, a comparable ALC grade either as part of construction or as part of decommissioning.

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		quality land actually selected must not simply be assumed.	The Applicant notes the comment regarding the use of poorer quality land and refers to its response provided under Comment ID: WR-BEPS-139.
WR-BEPS-141	Ground Conditions	Chapter 16 remains fundamentally preliminary. Its technical basis is principally a Phase 1 desk study drawing upon geological mapping, historical records and a limited number of existing boreholes rather than comprehensive intrusive investigation across the Scheme. That is a material deficiency because East Pye would introduce thousands of driven supports, extensive cable trenching, deep BESS and substation foundations, HDD and other trenchless works, dewatering, concrete, grout and drilling fluids across land underlain by sensitive aquifers, heterogeneous superficial deposits, former military sites, private water supplies, peat and buried utilities. The Applicant instead proposes that substantial elements of ground investigation, Phase 2 assessment, Foundation Works Risk Assessments, piling assessments and crossing-specific	*The Applicant will respond in detail to evidence presented in Block East Pye Solar's commissioned hydrology report at Deadline 3. Subsequently, the Applicant has only responded to comments that do not rely on this evidence at this stage.* The assessments presented in **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]**, and its associated Appendices have been undertaken in accordance with the methodology agreed with the Environment Agency. The Applicant has previously provided responses to BEPS in relation to the interactions between geology, land contamination, hydrology and hydrogeology, and has detailed the agreement with the Environment Agency for undertaking ground investigation and interpretative assessment to inform the detailed design of the Scheme, as well as Foundation Works Risk Assessment and Hydrogeological Risk Assessment post-consent. The Applicant refers to its responses to BEPS-024, BEPS-078, BEPS-114, and BEPS-261 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. It is noted that the piled foundations for the PV arrays and any deep piled foundations for the National Grid Substation, BESS and Project Substations (if found to be required following ground investigation and the progression of detailed design) would not form a cut-off to groundwater flow, were a

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		hydrogeological work will follow consent.	laterally extensive shallow groundwater body to be present within the diamicton of the Lowestoft Formation. Similarly, mitigation relating to dewatering has been included at this stage on a precautionary 'reasonable worst-case' basis only. Any requirement for dewatering of trenchless crossing launch and reception pits would be defined following ground investigation and undertaken only in accordance with the mitigation measures specified in the **Outline CEMP [REP1-058]**.
WR-BEPS-142	Ground Conditions	That concern is reinforced by the August 2026 NPPF. Policy P2 requires sites to be suitable for their proposed use having regard to ground conditions, contamination and land-stability risks and states that adequate site-assessment information prepared by a competent person should be available to inform that judgment.	The 2026 NPPF defines "site assessment information" as "*Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate*". The Applicant has provided a Tier 1 land contamination Preliminary Risk Assessment and a ground stability risk assessment within **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]**. The Applicant considers these studies to be appropriate, and notes the agreement with the Environment Agency that ground investigation and further interpretative assessment (including, where required, Foundation Works Risk Assessment and Hydrogeological Risk Assessment) can be undertaken post-consent as described in the **Outline CEMP [REP1-058]**. The risk assessments have informed the impact assessments within **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]**.

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			ES Volume 3, Appendix 1.2 – Statement of Expertise [APP-112] details the competence of the Ground Conditions technical lead.
WR-BEPS-143	Ground Conditions	ExQ1 now puts essentially the same issue to the Applicant: how can an adequate ground, groundwater and contamination baseline be demonstrated without application-stage intrusive investigation, and how can a conclusion of no likely significant effects be reached where foundation risk assessments, hydrogeological assessments, investigations and design refinement remain for after consent? That question should be treated as an application-wide example of the distinction between permissible detailed refinement and information which determines whether the assessed solution is actually feasible. The Environment Agency identified this problem at scoping. It opposed the Applicant's attempt to scope ground conditions and groundwater effects out of the EIA because the hydrogeological setting had not been adequately	The Applicant refers to its response to Q1.16.1 within **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.

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		characterised and the relationship between groundwater and surface water was insufficiently understood. It identified incomplete or inaccurate ground information, uncertainty concerning groundwater abstractions and Source Protection Zones, and insufficient information concerning the depth and nature of foundations and HDD works. The EA considered the evidence insufficient to exclude contaminant migration to the underlying Principal Aquifer and required further investigation and risk assessment.	
WR-BEPS-144	Ground Conditions	That concern is reinforced by the underlying geology. The Applicant cannot safely assume that the Lowestoft Formation provides a continuous impermeable barrier protecting the Chalk and Crag aquifers.	The Applicant refers to its response to BEPS-428 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-145	Ground Conditions	The Environment Agency had already identified an apparent inconsistency in the Applicant's treatment of borehole TM18NE11, where 'blue clay' is recorded only to approximately 17.7 m before	The Applicant refers to its response to BEPS-428 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		'sharp sand', despite the Applicant summarising a greater thickness of Diamicton. That is not a trivial geological discrepancy. If lower-permeability clay is assumed where more permeable granular material actually occurs, the conceptual model may fail to identify a contaminant pathway between construction activity, shallow groundwater and the deeper Principal Aquifer.	
WR-BEPS-146	Ground Conditions	The Applicant's assessment of piling is consequently too narrow. Chapter 16 recognises that foundations may create preferential pathways but assesses risk principally by reference to the presence or absence of existing brownfield contamination. HFCL identifies the fundamental omission: the Scheme itself is capable of becoming the contaminant source. Construction fuels, oils, cementitious materials and spills, and operational sources including transformer oil and contaminated BESS firewater, may enter groundwater through pathways	The Applicant refers to its response to BEPS-423, BEPS-428, and BEPS-434 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. A risk assessment of future contamination would pre-suppose contamination occurring. The Applicant considers that a design that allows for future contamination to occur is not fit for purpose. Mitigation to prevent future contamination occurring is secured via the **Outline CEMP [REP1-058], Outline OEMP [REP1-060]** and **Outline DEMP [REP1-062]**. The assessments presented within **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** and **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** have been undertaken on a 'reasonable worst-case' basis, as is standard practice for EIA in the UK, and are considered by the Applicant to be appropriate. The Applicant

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		created by foundations or other intrusive works. The source–pathway–receptor model therefore cannot be confined to historic contamination. The Environment Agency's requirement for Foundation Works Risk Assessments and Piling Risk Assessments is important for precisely this reason. Similar hydrogeological risk assessment is required for HDD and other trenchless methods where they may interact with Principal or Secondary A aquifers, watercourses or sensitive ecological receptors. These later assessments cannot safely be treated as routine construction detail where their findings may determine whether the proposed foundation system or crossing method is environmentally acceptable at all.	notes the agreement with the Environment Agency that ground investigation and further interpretative assessment (including, where required, Foundation Works Risk Assessment and Hydrogeological Risk Assessment) can be undertaken post-consent as described in the **Outline CEMP [REP1-058]**.
WR-BEPS-147	Ground Conditions	The private-water-supply evidence makes that uncertainty particularly serious. At scoping, 35 private water supplies were identified within 250 m for which accurate	The Applicant refers to its response to WR-BEPS-070 and responses BEPS-260 and BEPS-261 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		locations and/or abstraction strata were unavailable. The Environment Agency required the locations and, where possible, abstraction horizons to be established, and required a wider search around the BESS and substations. Until that work is complete, the receptor side of the source–pathway–receptor model is itself incomplete.	
WR-BEPS-148	Ground Conditions	The former military sites create a separate group of inadequately characterised contamination risks. Site 3 occupies former RAF Hardwick, Site 10 lies within the former RAF Seething landscape, and Site 1/BESS lies close to RAF Tibenham. The Inspectorate identified moderate-to-high UXO potential associated with former airfields and aircraft crashes and required further investigation. The Environment Agency required consideration of historic disposal around RAF Hardwick, including aircraft, ordnance and possible radium-impacted ash. South Norfolk Council separately required further investigation of	The Applicant refers to its response to BEPS-424, BEPS-425 and BEPS-454 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. Tables 5.3 and 5.5 of **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** detail the potential contaminants of concern associated with RAF Hardwick and RAF Seething, and include PFAS, de-icers and radiological hazards associated with ad-hoc aircraft disposal.

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		former airfield contamination and identified PFAS, firefighting-foam residues and de-icing chemicals as plausible contaminants requiring consideration. PFAS is particularly important because it demonstrates why investigation after consent is not a neutral solution. If intrusive investigation subsequently identifies persistent contaminants in hydraulic connection with groundwater, the appropriate response may not be a minor amendment to a method statement. It may require a different foundation system, avoidance of an area, different drainage, relocation of infrastructure or abandonment of a particular construction technique. The environmental acceptability of the development would therefore be being determined after the power to construct it had already been granted.	
WR-BEPS-149	Ground Conditions	The same concern applies to RAF Tibenham. Exclusion principally by geometric distance from identified source areas does not	The Applicant refers to its response to BEPS-424 within **The Applicant's Response to Relevant Representations Part 3**

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		demonstrate absence of a hydrogeological pathway. Where Site 1 and the BESS occupy a sensitive groundwater setting, where superficial deposits are heterogeneous and where private groundwater abstractions occur locally, pathway evidence is more important than an arbitrary distance threshold.	**- Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-150	Ground Conditions	CRC7 illustrates the same problem in relation to peat and trenchless works. HDD is proposed beneath Hempnall Beck in an area involving mapped peat and the Fritton Grange Meadows CWS. Natural England requires clarification and avoidance of peat. A trenchless crossing cannot simply be equated with avoidance: the environmental consequences depend upon actual depth, geological conditions, drilling-fluid pressures, settlement potential, groundwater movement and the hydraulic relationship between the watercourse, peat and underlying strata. Those conditions need to be understood before HDD can be relied upon as mitigation.	As described in the **Outline CEMP [REP1-058]**, further assessment will be undertaken post-consent of the trenchless crossings beneath Hempnall Beck in CRC7. This further assessment will be undertaken as part of the post-consent ground investigation. The investigation will aim to determine the local geological conditions and groundwater flow characteristics at each crossing location. The detailed design of the CRC7 trenchless crossing will be informed by the results of the ground investigation, with the design principle being to provide avoidance of peat deposits.

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WR-BEPS-151	Ground Conditions	Buried utilities increase the constraint further. The development interacts with the National Gas Transmission network, water and sewer infrastructure, electricity systems and other buried services. A strike or failure may create not simply an engineering or health-and-safety issue, but a gas release, flooding event, contaminant pathway or major-accident consequence. Ground conditions therefore interact directly with Chapter 18 rather than forming an isolated technical discipline.	The Applicant refers to its response to WR-BEPS-225.
WR-BEPS-152	Ground Conditions	A Phase 1 desk study cannot establish absence of significant effect where the intrusive investigation required to determine actual ground conditions has not yet occurred; the hydrogeological conceptual model is incomplete; some drinking-water receptors may be unidentified or wrongly characterised; GWDTE connectivity has not been assessed adequately; contaminant sources associated with former airfields remain unresolved; and	The Applicant considers that the assessment presented in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** and **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** is appropriate given that the majority of the land within the Order Limits is previously undeveloped land. As detailed in earlier responses in this document, the assessments have been undertaken on a reasonable worst-case basis in accordance with the methodology agreed with the Environment Agency, with further assessment to be undertaken post-consent to refine the assessments undertaken to date, as agreed with the Environment Agency.

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		the development itself has not been fully incorporated as a potential source of groundwater pollution. Nor can later FWRAs and HDD assessments be treated simply as mitigation of an established acceptable scheme where they may determine whether the proposed foundation or construction method is permissible in the first place.	The post-consent ground investigation, Foundation Works Risk Assessment and Hydrogeological Risk Assessment are not forms of mitigation that simply offset contamination that may occur due to construction or limit its extent. These mitigations inform the design of the Scheme such that it can be designed so that contamination does not occur, e.g., FWRA informs appropriate pile type choice to prevent creation of preferential pathways, ground investigation identifies existing contamination and allows remediation to be specified and undertaken etc. The Applicant refers to its response to WR-BEPS-146 for commentary on contamination introduced as a result of construction, operation or decommissioning of the Scheme.
WR-BEPS-153	Ground Conditions	The conclusion should therefore be stronger than a requirement for further routine investigation. Chapter 16 has not demonstrated that East Pye can be constructed within the authorised envelope without unacceptable ground and groundwater effects. The Applicant seeks consent for extensive intrusive development before establishing the conceptual ground model necessary to determine where that development can safely occur. The outstanding evidence may require different foundation systems, alternative HDD	The Applicant refers to its response to WR-BEPS-152.

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		methods, avoidance of contaminated ground, additional separation from private abstractions or GWDTEs, relocation of infrastructure, or removal of works altogether. Those are matters of scheme acceptability and design, not matters which can safely be left wholesale to post-consent construction control.	
WR-BEPS-154	Ground Conditions	On the present evidence, the Applicant has not shown that the physical ground through which East Pye would be built is capable of accommodating the proposed development without unacceptable risks to Principal Aquifers, drinking-water supplies, connected surface waters, groundwater-dependent ecosystems and human health. Where the missing information may change whether, where and how authorised Works can be constructed, a positive conclusion cannot logically precede that information. Unless the Applicant provides the necessary intrusive investigation, coherent hydrogeological	The Applicant refers to its response to WR-BEPS-152.

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		conceptual model, receptor-specific assessment, contamination characterisation and foundation/HDD evidence during the Examination – and demonstrates that the resulting solution remains within the environmentally assessed DCO envelope – Chapter 16 materially undermines both the adequacy of the environmental case and the physical deliverability of East Pye. It therefore weighs strongly against development consent.	
WR-BEPS-155	Electromagnetic Fields	Chapter 17 does not demonstrate that the electromagnetic-field effects of East Pye are insignificant. BEPS does not contend that harmful human exposure has already been proved. The more fundamental objection is that the Applicant has reached a Minor/Not Significant conclusion without modelling the electrical system for which it actually seeks consent. That distinction is important. The question for the Examination is not whether generic electricity infrastructure can normally comply	The Applicant has assessed the impact of high-voltage transmission, in addition to the proposed electrical infrastructure in **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** which concludes a significant impact is not predicted due to the predicted electric and magnetic field strengths remaining within public exposure limits, field strengths diminishing rapidly within a short distance, and the separation distances between infrastructure and human health receptors.

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		with public-exposure limits, but whether this particular combination of 132 kV and 400 kV infrastructure, operating in this particular configuration and in proximity to these particular human and ecological receptors, has been shown to do so.	
WR-BEPS-156	Electromagnetic Fields	That was precisely the concern identified at scoping. The Applicant originally sought to scope EMF out, relying on generic embedded measures such as undergrounding, locating substations and the BESS away from receptors and maintaining a 15 m offset from PRoWs. It had undertaken no baseline EMF survey and proposed no further baseline work. The Inspectorate expressly refused that request because of the uncertainty surrounding the cabling design, possible 400 kV overhead infrastructure and proximity to receptors. It required the ES to address risks to both human and ecological receptors, having regard to relevant technical guidance, and to identify the	The Applicant refers to its response to WR-BEPS-155.

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		design measures relied upon to prevent significant effects. Chapter 17 therefore needs to be judged against an explicit requirement for a project-specific human and ecological assessment, not merely a generic demonstration that electricity infrastructure is normally capable of compliance. The scale of the electrical system makes that requirement material. East Pye comprises extensive 33–132 kV internal networks; 400 kV underground circuits; existing and diverted 400 kV overhead lines; new pylons; Project Substations; a proposed National Grid Substation; transformers, switchgear, conversion units and inverters; the BESS and its power-conversion equipment; and cable joints, terminations and connection infrastructure. At Site 1B in particular, the Scheme concentrates the proposed National Grid Substation, Project infrastructure, the existing/diverted dual-circuit 400 kV overhead line and new pylons in the Great Moulton area. The relevant	

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		environmental question is therefore the field environment created by the system as a whole, including simultaneous operation of adjacent sources, rather than the behaviour of an isolated generic cable or generic overhead line.	
WR-BEPS-157	Electromagnetic Fields	Appendix 17.1 does not provide that assessment. Its essential function is public-exposure compliance screening using published generic field values and reference levels. It does not contain a source model of East Pye, receptor coordinates, field contours or calculations for the actual electrical layout. There is no modelling based on the proposed conductor configurations, maximum currents, circuit spacing, phasing or bonding arrangements; actual burial depths; number of circuits within particular corridors; joint bays and terminations; final overhead-line geometry, conductor clearance and sag; topography; simultaneous operation of neighbouring electrical sources; or the range of configurations	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (**ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**) to calculate the field strength at locations and determine the impacts upon human health. The assessment shows that field strength is highest at the source (i.e. 0m from the source) and diminishes rapidly as the distance increases. When assessing the cumulative effects of electromagnetic fields, the worst case is based upon the addition of source 'a' and source 'b' (i.e. 'a+b'); however, it is important to note that this is only true for magnetic fields that are exactly in line. When electromagnetic fields are not in line, the sum of these is less than 'a+b'. The typical electromagnetic fields for infrastructure associated with the Scheme is shown to be within and below the acceptable exposure limits.

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		permitted by the DCO envelope. Nor are maximum predicted electric and magnetic fields given for identified homes, workplaces, PRoWs or ecological receptors. That omission is particularly important because the generic numbers relied upon do not provide large margins from the selected reference levels. Chapter 17 cites approximately 95 μT at one metre above the centreline of a generic 400 kV underground cable against a public magnetic-field reference level of 100 μT. That is a margin of only 5 μT, or 5%. Yet the Applicant does not demonstrate that the East Pye configuration corresponds to the generic cable from which the figure is taken. It does not show whether the calculation assumes one circuit or several, what current is flowing, how conductors are arranged, whether parallel circuits reinforce or partly cancel their fields, what occurs at joint bays and terminations, or what tolerances arise from detailed design and later replacement. A	

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		generic result lying only 5% below the selected reference level cannot rationally support a categorical project-wide conclusion of Low magnitude and Minor/Not Significant effect without showing that the authorised East Pye system remains within that result under its maximum design case.	
WR-BEPS-158	Electromagnetic Fields	The overhead-line evidence raises the same issue more clearly. The Applicant itself records generic electric fields immediately beneath a 400 kV overhead line of approximately 10–10.6 kV/m, more than twice the 5 kV/m public reference level on which it relies. The assessment then depends upon the proposition that the electric field falls below the reference level with lateral separation, including reliance on a 15 m distance. But Chapter 17 provides no receptor-specific calculations showing the actual field at the relevant distance from the East Pye conductors; no contours demonstrating where the 5 kV/m line would fall after	The reliance on a 15m separation distance is existing, as 'a typical 400 kV pylon is 45-50 metres tall' (source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022). As such, the predicted electric field strength will be below the public reference level, and not significant. The public reference limits of 100μT (magnetic fields) and 5kV m^{-1} (electric fields) in the UK come from the 1998 ICNIRP guidelines. The assessment **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** presents this in further detail.

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		diversion of the existing circuit; no assessment of conductor height, sag, pylon geometry or topography; and no clear demonstration that the necessary separation is secured throughout the DCO. South Norfolk Council separately identified errors or ambiguities in the presentation of the figures, noting that explanatory text referred to underground-cable drop-off even where the figures related to overhead lines, and requested clarification of the applicable ICNIRP criteria.	
WR-BEPS-159	Electromagnetic Fields	The guidance issue should also be expressed accurately. The relevant later ICNIRP low-frequency guidance is the 2010 guidance for 1 Hz–100 kHz; the 2020 ICNIRP guidance relates principally to radiofrequency exposure and should not simply be substituted as the applicable 50 Hz standard. The important criticism is that the Applicant needs to explain clearly which exposure criteria apply, how the 1998 and 2010 guidance relate to the assessment, and why the	The UK Policy on public exposure limits to EMF radiation is designed to comply with the 1998 International Commission on the Non-Ionizing Radiation Protection (ICNIRP) guidelines in terms of the 1999 EU Recommendation. In 2010, ICNIRP produced new guidelines but these have not yet been incorporated into UK Policy. The *Electromagnetic fields: policies and regulations* published by the UK Health Security Agency specifically states that *that the ICNIRP guidelines are implemented as expressed in the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC), which refers to the 1998 ICNIRP guidelines* (https://www.gov.uk/government/publications/electromagnetic-fields/electromagnetic-fields-policies-and-regulations).

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		chosen criteria are appropriate for each source and receptor. SNC expressly requested that comparison. There is also no measured baseline. That matters because the western part of the Scheme already contains a 400 kV overhead line. Chapter 17 effectively treats that existing field as part of the baseline and therefore not an effect of the Scheme, while the Scheme itself would alter that electrical environment through diversion of the line, construction of new pylons and addition of major 400 kV infrastructure. No measurements establish existing field strengths at nearby dwellings, PRoWs, workplaces or ecological corridors, and there is consequently no empirical baseline against which the change caused by East Pye can be tested. The Applicant's original Scoping Report expressly confirmed that no baseline EMF surveys had been undertaken.	The Applicant recognises that existing sources of EMF exist as part of the baseline environment, as presented in section 2.4 of **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**. Given that EMFs are shown to diminish rapidly, a baseline survey would not yield data to be comparable to.

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WR-BEPS-160	Electromagnetic Fields	The human-receptor assessment is also insufficiently differentiated. Chapter 17 generally assigns human receptors Medium sensitivity because exposure to EMF is an ordinary feature of modern life. That does not explain the sensitivity of individual receptors to this development. Homes represent potentially long-duration exposure; PRoWs may pass through or alongside electrical corridors; agricultural and maintenance workers may spend repeated periods near equipment; and persons with implanted medical devices may require different consideration from the general population. Nor does Chapter 17 provide an exposure schedule showing the predicted maximum field at each identified receptor. The Applicant therefore moves from a generic characterisation of people as Medium sensitivity directly to a project-wide Minor conclusion without the receptor-specific exposure calculation that should sit between them. Norfolk County	Human health receptors have been assigned medium sensitivity, recognising that exposure to electromagnetic fields (EMF) is an established environmental health consideration identified by the World Health Organization (WHO). The assessment **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** presents the typical levels of electromagnetic fields for home electrical equipment, which are below the public reference levels. The maximum predicted levels of EMF at 1m from the centreline of the proposed infrastructure for the Scheme are below the public reference limits. Where the electric field strength associated with 400kV overhead cables is greater than the reference limit, an existing setback distance is maintained due to 'a typical 400 kV pylon is 45-50 metres tall' (source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022).

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		Council had already identified EMF as an issue requiring thorough investigation within the wider health assessment because of its potential significance to local communities.	
WR-BEPS-161	Electromagnetic Fields	The treatment of substations, transformers, inverters and the BESS is weaker still. Their effects are not quantitatively modelled. The assessment relies substantially on enclosure, access control and CE/UKCA conformity to infer that they will not create material public exposure. Product conformity is not a substitute for an environmental field calculation. Chapter 17 provides no equipment-specific source inventory, transformer or inverter ratings, maximum operating currents, magnetic-field contours around the BESS or substations, or calculation of the combined field where several pieces of equipment operate together. This is significant for a 60-year development in which electrical plant can be replaced: there is no clear EMF performance limit	The Applicant acknowledges that product conformity alone does not demonstrate compliance with EMF exposure. Whilst the assessment refers to CE/UKCA conformity, enclosure and access controls as relevant, these measures form part of the overall design and operational approach, alongside consideration of the applicable guidance and exposure reference levels with the associated infrastructure. There are controls in place that ensure equipment does not exceed these threshold limits of EMF. The UK Government's policy is that public exposure to EMFs should comply with the guidelines published by the ICNIRP in 1998. Product CE/UKCA conformity marking forms part of this policy.

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		ensuring that replacement equipment remains within the field characteristics assumed at consent.	
WR-BEPS-162	Electromagnetic Fields	The most serious deficiency, however, is ecological. The Inspectorate did not merely require consideration of human exposure. Scoping Opinion 3.4.1 expressly required assessment of human and ecological receptors. Chapter 17 nevertheless constructs its sensitivity classifications, magnitude criteria, significance conclusions and residual-effects assessment essentially around human exposure. Ecological effects are largely displaced into Chapter 8 without a corresponding EMF methodology identifying ecological receptors, exposure pathways, field strengths, thresholds or significance criteria. A cross-reference to Ecology cannot discharge the Scoping Opinion where neither chapter actually undertakes the assessment. The omission is particularly stark at Hempnall Beck. The	The Applicant does not agree that the EMF pathway for aquatic ecological receptors was omitted. Scoping Opinion 3.15.17 required the ES either to assess EMF effects on fish or to provide evidence that the burial depth at the Hempnall Beck crossing would avoid magnetic fields at levels detectable by fish. The Applicant addressed this through the receptor-specific ecological assessment in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**, which assesses operational EMF effects on freshwater fish, aquatic invertebrates and white-clawed crayfish and concludes that these would be negligible and not significant. The assessment takes account of the separation provided by installing the 400 kV cable beneath Hempnall Beck using trenchless techniques at a minimum depth of 5 m below the surveyed riverbed. Further clarification regarding EMF effects on fish was provided in the **Statement of Common Ground with the Environment Agency [REP1-087]** at EA EB - 2. The Applicant therefore remains satisfied that the relevant aquatic receptors and exposure pathway have been assessed and that the requirements of the Scoping Opinion have been addressed.

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		Environment Agency specifically advised that the Beck contains a notable fish population including brown/sea trout, bullhead, European eel and brook lamprey. It identified a potential adverse EMF pathway from the 400 kV cable crossing at CRC7 and requested either an assessment of effects or evidence that the cable would be buried sufficiently deeply for magnetic fields not to be detectable by fish. The Inspectorate adopted that issue expressly in Scoping Opinion 3.15.17: the ES was to assess EMF effects on fish or demonstrate that burial depth at the Hempnall Beck crossing would avoid detectable magnetic fields. Chapter 17 does not provide that crossing-specific demonstration. There is no calculation of magnetic flux density at the stream bed, banks or water column; no stated cable configuration and loading at the crossing; no modelling of alternative burial depths; and no assessment of whether parallel circuits alter exposure. The	

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		generic human calculation at one metre above a buried cable does not answer the question posed by the Environment Agency or the Inspectorate, because an aquatic organism may be immediately above the bed and the relevant ecological question is not whether a human public-exposure limit is exceeded.	
WR-BEPS-163	Electromagnetic Fields	That omission has become more important as the ecological baseline has developed. The River Tas is a chalk-stream priority habitat and white-clawed crayfish have been recorded within the system; the Scoping Opinion specifically required crayfish to be investigated at relevant watercourse works. Aquatic invertebrates were also expressly required to remain within the assessment. Yet Chapter 17 contains no receptor-specific EMF analysis for fish, white-clawed crayfish or aquatic invertebrates. BEPS does not need to establish that a particular field strength will necessarily harm those species in order for the omission to matter.	The Applicant refers to its response to WR-BEPS-162. The additional evidence concerning white-clawed crayfish within the wider River Tas catchment does not alter the assessed EMF exposure pathway or the conclusion that significant EMF-related effects on aquatic ecological receptors are not anticipated.

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		The Applicant was expressly required to assess the pathway, and it has not demonstrated the field to which those receptors would actually be exposed.	
WR-BEPS-164	Electromagnetic Fields	The same evidential problem arises in relation to bats. East Pye occupies a landscape of exceptional bat importance, including widespread barbastelle activity and maternity-colony networks. Yet there is no overlay of the high-voltage infrastructure with known roosts, core sustenance zones, commuting routes or woodland and hedgerow corridors, and no calculation of fields within those habitats. The scientific evidence concerning biological responses to EMF is less settled than the human acute-exposure framework, which makes it particularly important not to convert uncertainty into an assumption of no effect. The defensible requirement is a receptor-specific ecological assessment capable of demonstrating that the proposed electrical infrastructure does not	High voltage infrastructure (overhead lines) will occupy the approximate area of existing high voltage infrastructure (within Site 1) existing overhead lines outside of Site 1 will not be impacted. Therefore, there will be no significant increase in baseline EMF risks associated with overhead lines.

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		materially affect the ecological functions on which protected species depend. Chapter 17 does not provide one.	
WR-BEPS-165	Electromagnetic Fields	The phase assessment is also too narrow. Construction and decommissioning are effectively excluded on the reasoning that unelectrified new cables do not themselves generate operational EMF. That does not address construction beneath or beside the existing live 400 kV system, commissioning and staged energisation, replacement works undertaken alongside operational equipment, or eventual decommissioning where National Grid infrastructure is expected to remain. Worker and contractor exposure during those interfaces is therefore not captured simply by stating that unenergised cables produce no field.	The Applicant recognises the potential impact of the existing live 400 kV system and therefore recommends maintaining a setback distance in section 4.6 of **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**. Given that 'a typical 400 kV pylon is 45-50 metres tall' (source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022), and that infrastructure will not be actively in use (i.e. unenergised) during construction, a significant impact is not predicted.
WR-BEPS-166	Electromagnetic Fields	Nor is there a satisfactory cumulative assessment. Chapter 17 gives limited consideration to cables sharing trenches and refers to ordinary household electrical sources, but does not model the	When assessing the cumulative effects of electromagnetic fields, the worst case is based upon the addition of source 'a' and source 'b' (i.e. 'a+b'); however, it is important to note that this is only true for magnetic fields that are exactly in line.

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		cumulative field at a receptor from multiple East Pye circuits, an existing or diverted 400 kV overhead line, the National Grid and Project substations, transformers, BESS power-conversion equipment and nearby cables operating simultaneously. The comparison with household appliances does not answer the cumulative EIA question created by concentrating several high-voltage sources within the same area. Nor is there a coherent ecological cumulative assessment where the cable system repeatedly crosses or runs alongside the same connected habitat network.	When electromagnetic fields are not in line, the sum of these is less than 'a+b'. The typical electromagnetic fields for infrastructure associated with the Scheme is shown to be within and below the acceptable exposure limits, including the existing separation distance observed for the existing 400kV overhead cable network The cumulative effects are not significantly impacted by the use of household items. Electrical household appliances will add to the overall exposure of electromagnetic fields; however, due to the lower voltages of the appliances and are not used constantly, these levels should remain below the recommended exposure limit, as only a temporary addition to the resultant electromagnetic field levels will incur. Considering all sources of radiation, the cumulative magnetic and electric fields are predicted to be below the acceptable exposure limits.
WR-BEPS-167	Electromagnetic Fields	The mitigation relied upon is correspondingly underdeveloped. Undergrounding removes or screens the external electric field but does not eliminate the magnetic field. A 15 m offset from overhead infrastructure cannot be treated as effective mitigation until the field at that distance has been calculated for the actual design and the offset legally secured. CE/UKCA conformity says nothing	Electromagnetic fields for underground cables are shown to be below the exposure limit at their highest and exactly 1m above the ground. Given that electromagnetic fields decrease with distance, the expected field strength at receptors is predicted to be negligible and not significant. The electric field associated with 400kV overhead cables are greater than the $10kVm^{-1}$ exposure limit; and therefore a 15m setback distance is recommended (the distance at which the field strength is at $10kVm^{-1}$). 'A typical 400 kV pylon is 45-50 metres tall' (source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022), and

ID	Theme	Comments/Issues Raised	Applicant's Response
		about the cumulative environmental field created by several compliant products operating together. There is no scheme-wide EMF management strategy; no mapped exclusion contours; no ecological separation requirement; no maximum field performance standard tied to the DCO; no requirement for post-energisation validation; no trigger for remedial action if predicted fields are exceeded; and no control ensuring that replacement equipment over the 60-year operational period remains within the assessed envelope.	therefore this setback distance is already observed for the existing 400kV overhead network. The Applicant acknowledges that product conformity alone does not demonstrate compliance with EMF exposure. Whilst the assessment refers to CE/UKCA conformity, enclosure and access controls as relevant, these measures form part of the overall design and operational approach, alongside consideration of the applicable guidance and exposure reference levels with the associated infrastructure.
WR-BEPS-168	Electromagnetic Fields	There are also internal indicators that the assessment has not been carried through consistently. Chapter 17 variously describes human receptors as Medium sensitivity while one table records High sensitivity; uses terminology inconsistently between magnitude and effect; refers in places to 'measured' field values despite there having been no East Pye measurements; and describes effects as temporary by reference	For clarity, Human health receptors are considered to be of Medium sensitivity because people experience EMFs from a man-made environment regularly. Exposure to electromagnetic fields (EMF) is an established environmental health consideration identified by the World Health Organization (WHO). The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (**ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]**) to calculate the field strength at locations and determine the impacts upon human health. The assessment calculates the distances between human health receptors and the

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		to the project lifetime even though exposure could continue for up to 60 years. The main text and technical appendix also use slightly different generic overhead-line figures. Individually these may be drafting issues, but collectively they make it more difficult to reproduce the route by which the Applicant moves from its source data to a Minor/Not Significant residual conclusion.	infrastructure specific to the Scheme to calculate the predicted electromagnetic strength levels.
WR-BEPS-169	Electromagnetic Fields	The resulting evidential gap is therefore substantial. The Applicant has shown, at most, that selected generic examples of individual electricity assets can fall within selected human public-exposure reference levels at particular distances. It has not shown what electric and magnetic fields the East Pye system itself would produce at its actual human and ecological receptors; whether the narrowest generic margins remain valid under the maximum DCO design; whether multiple sources materially alter those fields; whether the specific Hempnall Beck requirement	The field strength of specific infrastructure does not vary (i.e. the maximum magnetic field strength for a 132kV underground cable will consistently be 9μT) and therefore these measured results have been used to assess the specific infrastructure for the Scheme. The source of measured results is managed by National Grid (sources: https://www.emfs.info/contact-us and https://www.emfs.info/privacy-policy) to undertake the assessment; therefore, the Applicant considers these results robust and reliable.

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		imposed by the Inspectorate has been satisfied; or what enforceable measures would prevent later design or replacement from exceeding the assumptions on which the assessment depends.	
WR-BEPS-170	Electromagnetic Fields	The proper conclusion is consequently stronger than a request for clarification. The Applicant has not yet supplied the evidence necessary to support its Minor/Not Significant conclusion. Before consent can safely be recommended, it should provide a scheme-specific maximum-case EMF model covering every relevant 132 kV and 400 kV circuit, overhead-line configuration, substation, transformer, inverter, BESS installation, joint and termination; map predicted electric and magnetic fields against identified human and ecological receptors; undertake the crossing-specific aquatic assessment expressly required by the Inspectorate and Environment Agency; assess the combined field from simultaneously operating	The absence of modelling for every item of electrical equipment and every possible configuration does not result in the assessment conclusions not being reliable. The assessment considers the potential effects and the information reasonably required (such as known field strengths and measured distances) to establish whether significant effects are likely at identified receptors. The Applicant acknowledges the potential for cumulative EMF exposure. Multiple electrical sources simply in existence does not establish that the cumulative field strength would exceed the exposure reference levels. Cumulative effects should take account of the distances between infrastructure and physical configuration. Reference to the use of household electrical sources does not replace the cumulative assessment of the Scheme but provides contextual information to demonstrate existing exposure to EMF.

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		infrastructure; and secure the resulting separation distances, burial depths, equipment limits and monitoring requirements within the DCO. That evidence may show that effects can be satisfactorily controlled. But until it exists, the Examination does not know whether the authorised design complies with the assumptions on which Chapter 17 depends, whether particular cable or overhead-line alignments require greater separation, whether ecological crossings require deeper burial or rerouting, or whether infrastructure must be relocated. Those are pre-consent questions capable of changing the physical design of the Scheme, not matters which can safely be left to detailed design after consent. The Inspectorate specifically refused to allow EMF to be scoped out because precisely these uncertainties existed. Chapter 17 has not resolved them. Its Not Significant conclusion should therefore be	

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		afforded little weight and, unless the deficiency is remedied during the Examination within the assessed DCO envelope, it weighs materially against development consent.	
WR-BEPS-171	Other Environmental Matters Major Accidents and Disasters	Chapter 18 identifies a series of risks which become materially more serious when considered together. East Pye does not merely introduce solar panels and electrical equipment into open countryside. At Sites 1 and 5 in particular, the Scheme concentrates high-voltage infrastructure alongside aviation activity, strategic gas and rail infrastructure, groundwater and drinking-water receptors, sensitive aquatic and terrestrial ecology, roads and nearby communities. The central issue is therefore one of **risk interaction**. Demonstrating that each asset can normally be operated safely in isolation does not establish that the combined probability–consequence profile of the East Pye infrastructure clusters is acceptable.	The Applicant refers to its response to BEPS-450, BEPS-451, BEPS-452, BEPS-457 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** 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. 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. As detailed in the Design Principles, Parameters, and Commitments, the

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			Containers/Compounds will be a minimum of 200m from the closest residential property. 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 CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, 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. The relevant risk assessments for safety during construction/ decommissioning will be required and produced by the Contractor prior to construction /decommissioning, which will be implemented to minimise the risk of accidents and disasters on site. 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.
WR-BEPS-172	Major Accidents and Disasters	The August 2026 NPPF adds relevant public-safety and aviation context. P5 requires development to anticipate and address hazards and, where development interacts with major-hazard pipelines or safeguarded aviation areas, places emphasis on demonstrating	The Applicant refers to WR-AVI-001 and WR-AVI-002 in Table 3.28 in **The Applicant's Response to Submissions Received at Deadline 1 - Members of the Public [EN0110014/EXAM/9.34]**, in respect of aviation safety. The Applicant continues to engage with Norfolk Gliding Club (NGC), who operate from Tibenham Airfield, regarding the impact upon their safeguarding concerns. Further comments

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		safety after consultation with the relevant bodies. TR7 recognises the importance of maintaining the national network of aviation airfields and their leisure, training and emergency-service functions. That is particularly relevant following ISH1 and ExQ1. The examination is no longer treating aviation as a glint-and-glare issue alone: emergency landing, glider launch failure, obstacles, turbulence, wind effects, substations and BESS are all now live matters. The Site 7 haul-road crossing of the high-pressure National Gas pipeline likewise remained technically unexplained at ISH1 and became an action point.	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 **[REP1-096]** the first draft of which was submitted at Deadline 1. In respect of the high pressure National Gas pipeline, Protective Provisions are included in the **Draft DCO [REP1-014]** to the benefit of National Gas, in relation to their apparatus. The Applicant will continue to engage with National Gas to agree the Protective Provisions during examination.
WR-BEPS-173	Major Accidents and Disasters	ExQ1 also asks why aspects of BESS fire safety remain dependent upon future assessment and design. Those questions reinforce Chapter 18's core proposition: a collection of controls which may eventually make each individual component safe is not the same thing as demonstrating now that the	The Applicant notes this comment and refers to its response to ExQ1.6.4 in the **Applicant Response to the Examining Authorities Initial Written Questions [REP1-083]**.

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		authorised infrastructure cluster, in the form the DCO permits, has an adequately established combined risk profile.	
WR-BEPS-174	Major Accidents and Disasters	The utilities evidence is important in its own right. National Gas Transmission has confirmed that its FM05 Yelverton–Stowmarket high-pressure feeder main lies within or close to the Order Limits, together with cathodic-protection infrastructure and associated apparatus. Its easements preserve access and restrict buildings, structures, ground-level changes and storage within the protected strip. NGT also specifically identifies high-voltage cable crossings and parallelism, AC pylon parallelism, BESS and PV installations as capable of interfering with cathodic protection and requiring assessment and approval.	The Applicant refers to its response to WR-BEPS-225.
WR-BEPS-175	Major Accidents and Disasters	The gas-main issue is therefore not confined to the ordinary risk of excavation striking a buried pipeline. The electrical development itself may interact with the protection and operation	The Applicant refers to its response to WR-BEPS-225.

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		of the gas transmission system. East Pye consequently requires a resolved utilities-conflict assessment showing the relationship between cables, piles, substations, solar arrays, BESS infrastructure and gas assets; the required separations and construction controls; restrictions on loading and ground levels; cathodic-protection compatibility; continuing operator access; emergency arrangements; and the protective provisions applying throughout construction, operation, replacement and decommissioning. Equivalent clarity is required for water, sewer, fibre and other buried infrastructure. Later discovery of an incompatible easement or safety requirement may necessitate relocation of authorised infrastructure rather than simply a different construction method.	
WR-BEPS-176	Major Accidents and Disasters Aviation	The most serious major-accident issues are concentrated at Site 1 and Site 5.	The Applicant refers to its response to WR-BEPS-172.

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		At Site 1, the proposed National Grid and associated 400 kV infrastructure would create a permanent cluster of substations, gantries, transformers, busbars, pylons and overhead-line works immediately south of Great Moulton and north of Tibenham Airfield. The site lies within the airfield safeguarding context and within mapped glider launch-failure or EFATO sectors associated with runway headings 03/21, 08/26 and 15/33. That makes the aviation issue wider than conventional obstacle clearance or glint and glare. Gliders and tow aircraft experiencing launch failure or engine failure may have very limited altitude, time and manoeuvrability and rely upon unobstructed emergency landing areas. Additional pylons, substations, fencing and other infrastructure may therefore alter the available emergency environment even where individual structures do not technically	

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		infringe a conventional obstacle surface. The cumulative aviation context is also important. Norwich–Tilbury would introduce further 400 kV infrastructure to the west of the airfield, while Simpsons Maltings Solar Farm lies to the south-east. East Pye would add further transmission-scale infrastructure to the north. The relevant question is whether the combined infrastructure progressively constrains emergency glide-out options around several quadrants of the airfield. That requires airfield-specific EFATO trajectory assessment, obstacle modelling and engagement with the operator, not simply analysis of each structure in isolation. The consequence of an aircraft interaction with the Site 1 electrical infrastructure also distinguishes the issue from ordinary safeguarding. The 400 kV compound would contain transformers, high-voltage equipment and substantial quantities of insulating oil. A	

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		credible impact sequence could involve structural damage, oil release, ignition and secondary fire, followed by smoke, contaminated firewater and mobilisation of pollutants beyond the compound. The consequence assessment therefore needs to consider impact resistance, transformer-oil containment, bund performance under accident conditions, fire escalation, smoke and particulate dispersion, firewater containment and emergency-service access, rather than merely the probability of an aircraft strike.	
WR-BEPS-177	Major Accidents and Disasters Water Environment Ground Conditions	Those consequences are magnified by the receiving environment. Site 1 is above a **Principal Aquifer**, lies within the wider **River Waveney catchment** and is close to private water supplies. A major fire or impact event which compromises oil or firewater containment therefore creates a credible source–pathway–receptor chain from the substation through soils, drains and groundwater to potable	The Applicant refers the respondent to **Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** comment IDs BEPS-264 and BEPS-265.

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		abstractions and connected surface waters. Ordinary operational drainage calculations do not establish that containment would remain effective under the abnormal conditions which a major-accident assessment is intended to test.	
WR-BEPS-178	Major Accidents and Disasters	The London–Norwich main railway adds a further strategic receptor. It lies within the wider infrastructure corridor between Tibenham Airfield and the proposed transmission development. A constrained aircraft trajectory, debris, smoke or secondary fire could therefore affect not only East Pye infrastructure but the electrified railway, passengers, staff and continuity of a strategic transport route. The aviation, electricity and railway interfaces need to be considered as one scenario where a single initiating event could connect them.	As part of the **Outline BSMP [REP1-066],** a risk assessment of the potential impact on visibility has 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 rail. The Applicant continues to engage with Norfolk Gliding Club, who operate from Tibenham Airfield, to ensure their safeguarding concerns with respect to aircraft trajectory are satisfied. The Statement of Common Ground submitted at Deadline 1 reflects the ongoing engagement and will continue to be updated as examination progresses.
WR-BEPS-179	Major Accidents and Disasters	Great Moulton adds a direct human receptor. The WR identifies homes approximately 100–200 m north of the proposed compound. A transformer fire, aircraft impact,	The Applicant refers to its response to BEPSG-017, BEPS-280, and BEPS-452 on BESS safety within **The Applicant's Response to Relevant Representations Part 3 – Other**

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		smoke plume or major containment failure would therefore occur close to an established village rather than within an isolated industrial estate. The assessment needs to address radiant heat, smoke and particulate dispersion, emergency cordons, evacuation, access for responders and the ability to manage an incident while adjacent infrastructure remains energised. Norfolk Fire and Rescue Service has already raised concern about the safety of the Site 1B location because of its proximity to Great Moulton.	**Statutory Bodies, Undertakers, and Notable Parties [PDA-010]**
WR-BEPS-180	Major Accidents and Disasters	The combined Site 1 case is therefore: **aviation safeguarding + 400 kV infrastructure + transformer fire and oil + Principal Aquifer + private drinking-water supplies + Waveney catchment + strategic railway + nearby homes.** Each element increases either the likelihood, pathway or consequence of a credible	The Applicant refers to its response to WR-BEPS-176 to WR-BEPS-179. The Applicant has considered the potential for impacts to these receptors, and embedded suitable mitigation and control measures to avoid likely significant adverse effects are secured through DCO Requirement.

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		abnormal event. The Application does not presently provide an integrated worst-case assessment of that infrastructure cluster.	
WR-BEPS-181	Major Accidents and Disasters Ecology and Biodiversity Water Environment Ground Conditions	The risk environment at Site 5 is different but equally concentrated. The proposed 400 kV substation lies on elevated land connected by field drains, ditches and culverts to the River Tas system. In the event of transformer-oil release, bund failure, firewater exceedance or major electrical fire, contamination could therefore be carried beyond the compound into the connected chalk-stream catchment. That pathway is environmentally important because the River Tas system contains repeated evidence of **white-clawed crayfish**, **including breeding evidence**. Site 5 also has groundwater-fed private water supplies to the north. An accident may therefore create both a surface-water pathway towards highly sensitive aquatic ecology and a groundwater pathway towards drinking-water receptors.	The Applicant refers to its response to **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** comment IDs BEPS-264 and BEPS-281. The Applicant refers to its response to WR-BEPS-065 regarding white clawed crayfish.

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WR-BEPS-182	Major Accidents and Disasters	The location also creates a direct interface between major electricity and gas infrastructure. The site is intersected by a high-pressure gas transmission main together with local gas infrastructure. A transformer fire, explosion or ground failure could threaten pipeline integrity; conversely, gas release or ignition could escalate an electrical incident. Assessment is therefore required of separation distances, thermal radiation, blast or overpressure, pipeline resilience to external fire, electrical ignition interaction and coordinated emergency response. The National Gas evidence reinforces the point. NGT itself identifies PV arrays, BESS, high-voltage cables and high-voltage pylons as infrastructure requiring specific assessment because of possible interaction with its protected assets and cathodic-protection system. The coexistence of a 400 kV substation and strategic gas infrastructure therefore requires a demonstrated engineered solution rather than an	The Applicant refers to its response to WR-BEPS-225. The Applicant has considered utilities in the design of the Scheme, including the high-pressure gas main. Offset to utilities from infrastructure of the Scheme are shown on the **Works Plan [REP1-005 and REP1-006].** The **Draft DCO [REP1-014]** includes for Protective Provisions in Schedule 14 to safeguard utilities assets and associated operations.

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		assumption that the two regulated systems will independently remain safe.	
WR-BEPS-183	Major Accidents and Disasters	The human receptors at Site 5 materially increase the potential consequence. The WR identifies residential properties and the Fritton Conservation Area immediately south of the proposed infrastructure and **a children's nursery directly to the north**. A gas or transformer-related incident therefore requires quantitative consideration of smoke dispersion, radiant heat, emergency cordons, evacuation or shelter, emergency access and the particular vulnerability of young children.	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 CEMP [REP1-058]** and **Outline DEMP [REP1-062]**, 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. The relevant risk assessments for safety during construction/ decommissioning will be required and produced by the Contractor prior to construction /decommissioning, which will be implemented to minimise the risk of accidents and disasters on site. An Emergency Response Plan would be followed in the event of fire A thermal runaway incident at the BESS Compound (a BESS fire) is considered to be the only foreseeable risk in terms of air quality impacts on human receptors in an emergency incident. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions risk assessment (Appendix B of the **Outline BSMP [REP1-066]**) to model air quality and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS Compound. The assessment concludes that there will not be

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			a significant adverse effect at the closest residential receptor locations in the event of a BESS fire incident, and visibility distances are greater than safe stopping distances at nearby road and rail receptors. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the "*proposed development should not result in any significant adverse impact on public health*". The BESS fire emissions risk assessment has informed mitigation measures in the **Outline BSMP [REP1-066]** and a detailed BSMP is secured by Requirement 6 of the **Draft DCO [REP1-014]**. As there is no BESS proposed at Site 5, with the proposed BESS Compound located more than 6 km to the south west, there is not considered to be foreseeable risk of air quality impacts during a BESS fire to the identified human receptors immediately north and south of Site 5.
WR-BEPS-184	Major Accidents and Disasters	Site 5 also lies within the functional landscape of multiple barbastelle maternity colonies. Fire, smoke, prolonged emergency lighting, chemical release and emergency activity could affect ecological corridors beyond the substation boundary. The consequence assessment cannot stop at the compound fence where nationally important protected-	The Applicant refers to its response to WR-BEPS-176 to BEPS-183. Suitable embedded mitigation and control measures to avoid likely significant adverse effects associated with major accident and disaster risk events are secured through DCO Requirement. The Applicant has considered the potential for impacts to these receptors, and embedded suitable mitigation and control measures to avoid likely significant adverse effects are secured through DCO Requirement.

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		species habitat and hydrologically connected aquatic receptors occur immediately outside it. The combined Site 5 case is therefore: **400 kV infrastructure + high-pressure gas transmission + transformer oil and firewater + River Tas drainage pathways + chalk-stream ecology + white-clawed crayfish + private drinking-water supplies + nearby homes + a children's nursery + nationally important bat habitat**. That level of constraint stacking requires an integrated cross-hazard assessment.	
WR-BEPS-185	Major Accidents and Disasters	The fact that PINS allowed a standalone Major Accidents and Disasters chapter to be scoped out at an earlier stage does not resolve these later and more developed issues. The Scoping Opinion was based upon the scheme and information available at the time and expressly expected BESS fire risk, firefighting and containment to be addressed	The Applicant refers to its response to WR-BEPS-171 to WR-BEPS-185.

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		elsewhere. It does not establish that later-developed Site 1 and Site 5 configurations are acceptable once the combined interactions between transmission infrastructure, aviation, gas, railway, groundwater, ecology and human receptors are identified.	
WR-BEPS-186	Glint and Glare	Glint and glare forms the other significant part of Chapter 18 and reinforces rather than sits separately from those safety concerns. The Applicant's own earlier assessment identified potentially significant reflections towards the A140 and B1527 within drivers' primary fields of view, potentially significant effects at residential properties requiring mitigation, and reflections at some aerodromes above the 'low potential for temporary after-image' threshold.	The Applicant had identified potentially significant effects for sections of roads, a number of dwellings and aerodromes and provided mitigation where necessary as outlined in the assessment (**ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029]**). For aviation activity specifically, the Applicant refers to its response to WR-BEPS-176.
WR-BEPS-187	Glint and Glare Aviation	The aviation context is unusually dense. Applicant material identifies Hardwick Airfield approximately 30 m from Sub-Site 3A, Seething approximately 220 m from Sub-Site 10B, Norfolk Gliding	The Applicant notes this comment. The impact of the Scheme upon aviation activity in the wider environment of aviation activity has been considered where appropriate, such as the impact upon landing areas following EFATO and thermal updraft, in addition to glint and glare. The Applicant refers to

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		Club/Tibenham approximately 1 km from Sub-Site 1A, together with Topcroft Farm, Long Stratton, Nut Tree Farm and Tibenham Priory airstrips within the wider area. Glint and glare must therefore be understood as part of a wider aviation-safety environment rather than as a purely visual effect.	its response to WR-BEPS-176 for further information with specific reference to Tibenham Airfield.
WR-BEPS-188	Glint and Glare	PINS required the glint-and-glare assessment to justify its methodology and receptor selection and to address construction and decommissioning as well as operation. The absence of a standalone ES chapter does not mean those effects were substantively scoped out.	During construction and decommissioning of the Scheme, there will be less solar panels than the Scheme once fully operational. Therefore, impacts during these stages will be less than, or comparable (at the worst case) to the operational phase which the glint and glare assessment geometrically models for.
WR-BEPS-189	Glint and Glare	The residential evidence is also material. South Norfolk Council records that the Glint and Glare Assessment identified 68 remaining dwellings, 46 of which require mitigation. SNC also questioned inconsistencies between Chapter 18 and the technical appendix and challenged reliance on 'embedded mitigation' where the nature and maturity of	The Applicant recognises the potential for impacts upon residential amenity during the interim for vegetation that will provide mitigation to mature. The Applicant outlines mitigating factors that reduce the impact, such as the separation distance between observers and reflecting panels, and views of reflecting panels coinciding with the sun. Any resultant effect has far lesser consequences than, for example, solar reflections experienced towards a road network whereby the resultant impacts of a solar reflection can be much more serious to safety.

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		the planting had not been demonstrated. That is important because planting which may take years to become effective does not eliminate the intervening effect. Nor is screening environmentally neutral. Dense planting introduced to control glare may itself alter landscape openness, heritage setting or ecological function. The mitigation therefore needs to be assessed across topics rather than credited as a cost-free solution.	
WR-BEPS-190	Glint and Glare	For roads, glare engages driver distraction and highway safety. For homes it creates repeated residential exposure. For airfields it may affect operational safety. Those are materially different receptors and need controls designed around their actual functions.	The Applicant has assessed glint and glare impacts upon road safety, residential amenity and aviation activity with respect to their specific criteria (e.g. reflecting panels relative to the field of view for road users, duration of glare for residents at dwellings) in the assessment **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029].** The assessment concludes that significant impacts are not predicted with respect to their specific criteria.
WR-BEPS-191	Major Accidents and Disasters	The central conclusion of Chapter 18 is therefore that East Pye **creates two concentrated high-consequence infrastructure nodes without yet**	The Applicant refers to its response to WR-BEPS-171 to WR-BEPS-191 above. The Applicant has considered the potential for major accident and disaster risk events, and embedded suitable mitigation and control measures to avoid likely significant adverse effects are secured through DCO Requirement.

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		demonstrating the combined risk created at either. Major-accident assessment is not defeated merely because an individual event has a low probability. Low-frequency events remain material where the consequences are severe and where one failure may cascade across several systems. At Site 1, aviation, high-voltage transmission, transformer fire, groundwater, drinking-water supplies, the railway and Great Moulton converge within one risk environment. At Site 5, high-voltage infrastructure, high-pressure gas transmission, oil and firewater, chalk-stream drainage, protected aquatic ecology, private drinking-water supplies, a nursery, homes and nationally important bat habitat converge within another. Those combinations are themselves evidence of inadequate constraint avoidance. A location which depends upon multiple independent safety and	The impacts upon aviation in the context of glint and glare are presented in **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029]**. The assessment concludes that significant impacts are not predicted with respect to the specific criteria for each receptor. For aviation activity specifically, the Applicant refers to their response for WR-BEPS-176. The Applicant has assessed the impact of high-voltage transmission, in addition to the proposed electrical infrastructure in **ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]** which concludes a significant impact is not predicted.

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		containment systems all functioning successfully to prevent a single initiating event escalating across aviation, gas, electricity, water, ecology and human-health receptors requires a materially higher level of pre-consent demonstration than the Applicant has provided. The omission cannot be cured simply by pointing to separate fire, gas, drainage, aviation, ecology or emergency-management controls. The critical question is what happens when those systems interact under abnormal conditions.	
WR-BEPS-192	Other Environmental Matters	Before the ExA could safely conclude that Chapter 18 effects are acceptable, the Applicant would need to provide a coherent cross-hazard assessment addressing, where relevant, aviation and EFATO trajectories, obstacle risk, transformer fire and smoke, oil and firewater containment under accident conditions, gas–electricity domino effects, hydrogeological pathways, railway interaction, emergency	The Applicant refers to its response to BEPS-451, BEPS-452, BEPS-453 BEPS-454, BEPS-455, BEPS-456, and BEPS-457 regarding the assessment of Major Accidents and Disasters within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

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		access, evacuation and secured glint-and-glare mitigation. This is ultimately a **site-suitability** issue rather than merely one of residual risk management. If adequate safety margins require relocation of substations, increased separation from gas pipelines, homes or vulnerable receptors, alteration of the transmission layout, protection of aviation emergency corridors or materially different drainage and containment systems, those are changes to the physical design and location of the Scheme. They cannot safely be deferred to later management plans.	
WR-BEPS-193	Other Environmental Matters	On the present evidence, the Applicant has not demonstrated that the Site 1 and Site 5 infrastructure clusters are environmentally and operationally acceptable. Chapter 18 therefore weighs strongly against development consent and reinforces the wider conclusion that East Pye has been located in a landscape where multiple major	The effects of the Scheme, including Site 1 and Site 5, are assessed and presented within the ES. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [REP1-074]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. The assessment of Human Health Summary Statement within **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** has been undertaken on a reasonable worst-case basis using the assessed Scheme parameters and embedded

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		constraints overlap rather than being avoided. ISH1 materially developed the human-health issue. The ExA required the Applicant to explain how its assessment moves from acknowledging adverse effects on some individuals to concluding that significant adverse effects do not arise at population level; whether separate consideration has been given to concern or anxiety arising from perceived risks irrespective of whether those risks ultimately materialise; and to provide a standalone document bringing together the assessment, mitigation and evidence relating to mental health and wellbeing. The Applicant also committed to provide the equine-safety evidence relied upon in response to BEPS's questions concerning horse riders on affected bridleways. These matters reinforce BEPS's wider concern that health effects cannot safely be dismissed merely because the originating landscape, noise, transport or safety effect falls	mitigation secured through the application. For the majority of health pathways, including air quality, transport and access, water environment, climate change, socio-economics, soils and agricultural land, ground conditions and electromagnetic fields, effects are assessed as negligible, minor adverse, neutral or beneficial, and not significant. These conclusions are supported by clearly defined mitigation measures secured through the DCO framework With regard to mental wellbeing, both the Human Health Summary Statement within **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** and the **Equality Impact Assessment [APP-214]** recognise that large-scale infrastructure projects can give rise to anxiety, distress or concern for some individuals, particularly in relation to perceived risks, uncertainty and changes to valued landscapes. The assessments also acknowledge that these experiences may be more acute for some residents, and that the conclusion of no likely significant population-level health effect does not seek to discount the concern or distress reported by individual residents. However, taking account of the magnitude, duration and geographic extent of potential effects, together with embedded mitigation, neither assessment identified likely significant adverse effects on the mental health and wellbeing of surrounding communities at a population level. 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,

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		below a significance threshold in another ES chapter.	the Addendum does not alter the overall conclusions of the Human Health Summary Statement within Chapter 18 or the Equality Impact Assessment.
WR-BEPS-194	Cumulative and In-Combination Effects	The Scheme Has Not Been Assessed as One Functioning Environmental System Chapter 19 is the point at which the Environmental Statement should demonstrate that East Pye Solar is environmentally acceptable as a whole. Instead, it largely assembles residual conclusions already reached in the separate technical chapters. By the time an effect reaches Chapter 19 it has already been filtered through topic-specific significance thresholds, embedded-mitigation assumptions, professional judgment and, in several cases, incomplete baseline evidence or mitigation deferred to later design. Chapter 19 therefore does not independently test the environmental consequences of the authorised Scheme; it largely reproduces the assumptions and weaknesses of Chapters 6–18.	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**

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WR-BEPS-195	Cumulative and In-Combination Effects	The new NPPF contains several explicit cumulative and network-based concepts which reinforce that criticism. P3 requires cumulative pollution effects to be considered; TR6 requires reasonable future transport scenarios and cumulative effects; TR8 treats PRoWs as a network rather than isolated route segments; and N2 requires ecological networks extending beyond the site to be strengthened.	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA Methodology [APP-038].** The **Planning Statement [REP1-074]** was updated and submitted at Deadline 1 to account for the publication of the replacement NPPF.
WR-BEPS-196	Cumulative and In-Combination Effects	ExQ1 now independently identifies the same methodological problem in relation to recreational receptors by questioning the Applicant's compartmentalised treatment of individual PRoWs and seeking assessment of sequential experience along circular routes. The principle has wider application. Residents, heritage assets, bat populations, catchments and communities also experience the interaction of multiple Scheme components and impact pathways rather than the separate chapter classifications	As requested by the ExA, the Applicant has prepared a PRoW Sequential Assessment to be submitted at Deadline 2.

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		through which the ES reports them.	
WR-BEPS-197	Cumulative and In-Combination Effects	That is a serious methodological problem for East Pye Solar because this is not a compact generating station affecting a small number of discrete receptors. It comprises ten dispersed Sites and numerous Sub-Sites, approximately 24 km of cable corridor, multiple Project Substations, BESS, a new National Grid Substation, 132 kV and 400 kV infrastructure, existing and diverted overhead lines, new pylons, highway works, access and haul roads, construction compounds and extensive temporary working areas across approximately 54 square miles of the South Norfolk Claylands. Those components repeatedly affect the same villages, roads, landscapes, heritage settings, soils, aquifers, watercourses and ecological networks. The cumulative question is therefore not whether each isolated effect can individually be reduced to Minor or Not Significant. It is what	Technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, which includes all components of the Scheme. The assessments within the ES therefore consider the effects of the Scheme as a whole on receptors rather than individual elements in isolation.

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		happens to the same receptor when those pressures are experienced together.	
WR-BEPS-198	Cumulative and In-Combination Effects	The Applicant's methodology is poorly equipped to answer that question. Chapter 19 takes forward only residual effects of Minor or greater magnitude and excludes effects already characterised as Negligible. It then assesses broad 'receptor groups' rather than every individual receptor and expressly acknowledges that 'the scale of the effect interaction has not been identified'. Those three methodological choices mean that effects are filtered out before interaction is tested; specific worst-affected receptors are aggregated into broad categories; and the spatial and temporal extent of the remaining interaction is not quantified.	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**
WR-BEPS-199	Cumulative and In-Combination Effects	The exclusion of Negligible effects is particularly inappropriate for a dispersed development. The principal cumulative harm may arise precisely through repetition of individually small changes. One	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 within **The Applicant's Response to Relevant Representations Part 3**

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		hedge gap may be negligible; numerous gaps across a connected bat landscape may fragment commuting routes. One low-level source of lighting may be negligible; lighting associated with substations, BESS, compounds, accesses, vehicles, HDD works and security installations may progressively erode a previously dark landscape. One localised area of soil compaction may be limited; repeated compaction from haul roads, compounds, trenching, construction, maintenance and replacement may materially change soil structure and agricultural drainage. One small drainage alteration may appear insignificant, but repeated changes across several micro-catchments, cable corridors and foundations may change the volume, timing and quality of water reaching the same downstream chalk-stream receptor. The same principle applies to traffic, noise, landscape and heritage.	**- Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

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WR-BEPS-200	Cumulative and In-Combination Effects	There is therefore an element of circularity in the Applicant's approach. An effect is excluded from cumulative assessment because it was found negligible in isolation, even though the purpose of cumulative assessment is to determine whether several such effects become significant when repeated or experienced together. For East Pye Solar, that screening threshold is capable of producing false negatives by design: the more the environmental consequences are divided into individually small components, the more likely they are to disappear before their combined importance is examined.	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**
WR-BEPS-201	Cumulative and In-Combination Effects	The Applicant's express statement that 'the scale of the effect interaction has not been identified' is still more damaging. Scale is not incidental to cumulative significance; it is often determinative. The assessment should establish how many receptors are affected, how many Sites contribute, how much of a habitat or landscape is exposed,	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

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		how frequently effects occur, how many work fronts operate simultaneously, whether impacts overlap or follow sequentially, whether alternative unaffected habitat or routes remain and whether the interaction persists for hours, months, years or through repeated lifecycle phases. Chapter 19 assigns significance without first quantifying those matters.	
WR-BEPS-202	Cumulative and In-Combination Effects Ecology and Biodiversity	For a barbastelle maternity colony, scale means the number and importance of commuting and foraging routes affected across the Core Sustenance Zone, not simply the effect of one hedge crossing. For a settlement, it may mean the number of approaches industrialised by arrays, substations, pylons and construction traffic. For a road network, it means the number and timing of simultaneous work fronts drawing HGVs through the same constrained junctions and lanes. For a catchment, it means the combined area of compaction, trenching, foundations and drainage modification contributing	Technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, which includes all components of the Scheme. The assessments within the ES therefore consider the effects of the Scheme as a whole on receptors rather than individual elements or Sites in isolation.

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		to the same receiving watercourse. For heritage, it means progressive alteration of the historic landscape surrounding several related assets. None of those questions can be answered adequately while the scale of interaction remains unidentified.	
WR-BEPS-203	Cumulative and In-Combination Effects	This defect was foreseeable at scoping. The Planning Inspectorate required the Applicant to seek agreement with the relevant local planning authorities on the list of cumulative schemes and specifically required the ES to include a figure depicting the 'locations and extent' of cumulative developments in relation to East Pye. The present approach does not adequately convey that extent. Large solar schemes, housing developments, BESS installations and linear grid projects are represented substantially through point-symbol mapping. A development occupying hundreds of hectares, or a transmission corridor extending for kilometres, cannot meaningfully be represented by a	The Applicant acknowledges this comment and has produced an updated figure depicting the cumulative scheme boundaries, see **ES Volume 2, Figure 2.1 - Cumulative Developments [REP1-024].**

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		dot if the purpose is to identify shared landscapes, roads, catchments, ecological networks and heritage settings.	
WR-BEPS-204	Cumulative and In-Combination Effects	The external cumulative context is also considerably greater than the present summary suggests. Chapter 14 itself identifies **47 cumulative schemes, including 23 energy-related developments and 11 solar farms**, and relies upon the possibility of	The cumulative effects assessment in **ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** considers the possibility of overlapping construction phases for the purpose of adverse effects. • With respect to the Temporary Accommodation Market, it is not anticipated that construction of the Scheme will overlap with that of other nearby solar schemes. Nonetheless, overlap with other energy schemes would

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		simultaneous construction when claiming Major Beneficial cumulative employment effects. That is highly significant. If the surrounding development pipeline is sufficiently real to support a Major Beneficial economic conclusion, the same pipeline must be treated with equal seriousness when considering adverse effects on roads, labour availability, temporary accommodation, tourism, landscape, agriculture, drainage, ecology and community amenity. The Applicant cannot adopt an expansive cumulative scenario for benefits and a restrictive one for harms.	increase the number of workers needing to stay in the area, and it is acknowledged that this generates the potential for a greater magnitude of impact. The sensitivity of the temporary accommodation receptor is, however, low. This supports the Minor Adverse cumulative effect assessed. • With respect to the Tourism Industry, it is considered that each cumulative scheme will incorporate embedded mitigation, therefore the cumulative impact is considered to be Minor Adverse. The Applicant therefore does not agree that an expansive scenario is taken for benefits and a restrictive one for harms.
WR-BEPS-205	Cumulative and In-Combination Effects	South Norfolk Council makes the same broader point. It identifies Tasway Energy Park, Norwich to Tilbury, other proposed solar NSIPs and consented and proposed TCPA schemes and states that their significant cumulative impact on South Norfolk has not been adequately explored and is of serious concern. Norfolk County Council's	The Applicant will continue to discuss the list of cumulative schemes with NCC and SNC as the examination progresses.

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		LLFA similarly supports the inclusion of proposed but as yet unconsented solar and BESS schemes because many have similar programmes and may be constructed at the same time. It specifically identifies flood risk as an area where downstream cumulative effects may extend much further than the individual project boundary.	
WR-BEPS-206	Cumulative and In-Combination Effects	Tasway Energy Park is the clearest example of inconsistent treatment. It remains a real proposed project, albeit one whose programme and configuration have been uncertain, and both local authorities have treated it as relevant to the cumulative development context. It is also geographically and functionally relevant to the Great Moulton/Tivetshall infrastructure landscape. The ExA has additionally required EPS to consider whether future third-party use of the National Grid substation gives rise to further cumulative or downstream effects.	The Applicant disagrees that SNC and NCC consider Tasway to be a cumulative development to the Scheme. Whist they have previously identified it for consideration, that is no longer the case since the Tasway Energy Scheme was withdrawn, as set out in the Applicant's draft Statement of Common Ground with each authority. See the Applicant's response to BEPS-034 on the approach to Tasway Energy Park **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response to the BESS Gate 1 status at APL-008 in **The Applicant's Response to Relevant Representations Part 5 - By Theme [PDA-012].** See the Applicant's response to Action Point 12 to provide clarification on the capacity and use of the National Grid substation for future projects and confirm whether there are further cumulative or downstream effects that need to be considered as a result. **Written Summary of the Applicant's**

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		The WR identifies a legitimate inconsistency in the Applicant's approach: uncertainty is used to diminish Tasway's cumulative relevance while East Pye's own BESS remains integral to the Scheme and its claimed benefits despite its similar Gate 1 connection status and unresolved delivery position. A consistent methodology should either apply comparable evidential treatment to both or include Tasway at least as a reasonable worst-case sensitivity scenario.	**Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098].**
WR-BEPS-207	Cumulative and In-Combination Effects	Norwich to Tilbury is separately important because it is not simply another project on a list. It is major linear electricity infrastructure affecting the same broad rural landscape. It may add pylons and transmission infrastructure to the same landscape character areas, affect the same heritage settings, use parts of the same strategic and local highway network, disturb hedgerows and vegetation, fragment ecological networks and contribute further visual industrialisation. The relevant	Norwich to Tilbury is included within the cumulative developments list provided at **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116],** and the cumulative effects have been considered as appropriate within each technical chapter.

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		question is therefore not whether East Pye and Norwich to Tilbury are technically different developments, but whether the same church, village, woodland, road, airfield, historic landscape or ecological network experiences both.	
WR-BEPS-208	Cumulative and In-Combination Effects	Other solar and BESS developments require the same receptor-led approach. Multiple solar developments can cumulatively remove BMV land, reduce open-country habitat, generate repeated construction traffic, increase pressure on labour and temporary accommodation, transform landscape character and require additional grid infrastructure. Multiple BESS developments can add industrial compounds, transformer and inverter noise, lighting, HGV movements, drainage and firewater risks and demands on emergency services. Existing and proposed grid infrastructure further adds pylons, overhead lines, substations and electrical compounds. Chapter 19 needs to	A comprehensive Cumulative and Effects Assessment has been undertaken within the ES in accordance with Planning Inspectorate guidance, as detailed within **ES Volume 1, Chapter 2 - EIA Methodology [APP-038].** **ES Volume 3, Appendix 2.4 -Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES. Each topic chapter within the **ES [APP-042 – APP-054]** sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or proposed development. A summary of all cumulative effects is provided within Table 20.4 of **ES Volume 1, Chapter 20 - Summary of Residual Significant Effects [APP-056].**

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		determine the environmental carrying capacity of the receiving landscape rather than simply establish that each individual project has been assessed separately.	
WR-BEPS-209	Cumulative and In-Combination Effects	Housing growth is also part of the relevant future baseline. Strategic and local housing around Long Stratton, Tasburgh and other settlements can overlap with East Pye through HGV movements, road capacity, construction noise and dust, labour demand, accommodation pressure and drainage. It also creates new residents who will experience the changed landscape and increases use of PRoWs and rural roads. The future environment in which East Pye would operate for approximately 60 years is therefore not the present landscape frozen in time. The cumulative assessment needs to model the future development context realistically.	The Applicant refers to its response to WR-BEPS-208. The cumulative developments list includes residential schemes, where they fall within the Study Area and are considered likely to result in significant cumulative effects.

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WR-BEPS-210	Cumulative and In-Combination Effects	The internal cumulative assessment is even more important. **East Pye must be assessed cumulatively with itself**. The ten-Site configuration creates repeated industrialisation across one connected rural landscape. A settlement may see development on more than one approach; a barbastelle population may use hedges and woods spanning several Sites; one road may serve several construction areas; and the same catchment may receive runoff and drainage changes from several development parcels. Chapter 19 does not adequately demonstrate whether those repeated pressures collectively change the function and character of the South Norfolk Claylands. The approximately 24 km cable network is itself a major cumulative component. It requires trenching, HDD, joint bays, working widths, soil storage, access, dewatering and repeated crossings. Those activities simultaneously engage soils,	The Applicant refers to its response to WR-BEPS-197 above.

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		agricultural drainage, groundwater, archaeology, watercourses, ecology, transport and EMF. The fact that the cables will ultimately be underground does not make their construction environmentally neutral. The proper cumulative question is how many ecological, hydrological and agricultural systems are disturbed by the complete cable system, and whether those disturbances overlap spatially or temporally. The multiple electrical compounds likewise need to be treated as one infrastructure system. East Pye includes Project Substations, the National Grid Substation, 132 kV and 400 kV infrastructure, transformers, BESS, underground circuits, overhead lines and new or altered pylons. Their combined effects include landscape change, noise, lighting, EMF, drainage, deep foundations, transformer oil, abnormal-load transport and long-term retention. It is artificial to assess each substation or cable component locally without asking what cumulative industrial	

ID	Theme	Comments/Issues Raised	Applicant's Response
		environment is created by the electrical system as a whole.	
WR-BEPS-211	Cumulative and In-Combination Effects	Site 1 is the clearest example of this **internal constraint stacking**. It combines BESS, Project and National Grid 400 kV infrastructure, existing and proposed overhead-line works and pylons with nearby homes, groundwater and private-water receptors, landscape and ecological constraints, Tibenham Airfield, the railway and major construction access. The cumulative question is not whether each technical chapter contains some mitigation. It is whether fire containment, drainage, noise mitigation, aviation safeguarding, AIL access, groundwater protection, landscape mitigation, ecology, electrical safety and residential protection can all be achieved simultaneously within one physically deliverable Site 1 design. Chapter 19 does not undertake that test.	The Applicant refers to its response to WR-BEPS-197 and WR-BEPS-201.

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WR-BEPS-212	Cumulative and In-Combination Effects Construction and Decommissioning	The construction worst case is similarly undefined. The Applicant has not established the realistic maximum number and location of simultaneous compounds, active solar work fronts, piling areas, cable sections, HDD operations, highway works, haul routes and illuminated working areas. Each produces noise, traffic, dust, lighting, runoff, fuel storage, vegetation disturbance and human activity. Several 'temporary' effects can collectively become a prolonged landscape-scale pressure if they move sequentially through different Sites or operate concurrently. Without a programme-linked maximum simultaneous scenario, there is no demonstrated construction worst case.	The Environmental Statement assesses construction effects on a reasonable worst-case basis using the maximum design parameters and construction assumptions for the Scheme, as detailed within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**. The assessment therefore captures the likely significant environmental effects regardless of the precise sequencing of construction activities, which will be subject to detailed construction planning and controls secured through the **Outline CEMP [REP1-058]** and **Draft DCO [REP1-014]** Requirements. For the purposes of assessing a reasonable worst-case scenario, it has been assumed within **ES Volume 3, Appendix 11.1 Transport Assessment [APP-174]** that all construction activity will occur simultaneously. In reality, activities will be staggered across the duration of the construction programme.
WR-BEPS-213	Cumulative and In-Combination Effects Transport and Access	Transport illustrates why mitigation cannot simply be deducted from the cumulative assessment. Passing places, visibility splays, internal haul roads, road widening and revised accesses may reduce a highway problem but create other effects. They may require	The Applicant notes the concerns raised. While the representation refers to cumulative effects, the Applicant understands the concern to relate to the potential environmental implications of transport mitigation measures, rather than the cumulative effects assessment. The cumulative effects assessment has been undertaken in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** in accordance with the ISEP Guidelines for Environmental

ID	Theme	Comments/Issues Raised	Applicant's Response
		hedge or tree loss, excavation of verges, impact Roadside Nature Reserves, compact BMV soil, interfere with field drainage, alter historic lanes, affect culverts and watercourses or move traffic closer to houses and heritage assets. Where NCC has required an access strategy materially different from that originally assessed, the environmental consequences of the revised solution must themselves be assessed cumulatively. A transport solution is not environmentally neutral merely because it solves a transport constraint.	Assessment of Road Traffic (2023), which considers the cumulative effect of the Scheme and other committed developments. The development of transport mitigation measures has been informed through coordination with the relevant environmental and technical disciplines as part of the design process. This collaborative approach will continue through the development of the detailed Construction Traffic Management Plan to ensure that traffic management measures are implemented in a manner that appropriately balances transport, environmental and operational considerations.
WR-BEPS-214	Cumulative and In-Combination Effects Landscape and Visual	Landscape mitigation creates the same problem. New hedges, woodland and scrub can screen infrastructure, but that planting may simultaneously reduce the openness required by skylark and lapwing, alter historic relationships between churches, farmsteads and open fields, change the characteristic structure of the Claylands and constrain subsequent restoration of agricultural land. The same hedge	The Applicant does not agree that landscape mitigation has been applied without consideration of its wider environmental effects. The Applicant refers to its response to WR-BEPS-056. In addition, retained agricultural field will maintain the openness required for the skylark mitigation. The contribution of individual mitigation measures is considered within the relevant topic assessments and is not assumed to provide an equivalent benefit across landscape, heritage and ecology.

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		cannot simply be credited as landscape mitigation, heritage mitigation and ecological enhancement without assessing what it encloses, what habitat it changes and what historic view or spatial relationship it removes.	
WR-BEPS-215	Cumulative and In-Combination Effects Water Environment Soils and Agricultural Ground Conditions	Water, soils and ground conditions provide perhaps the clearest illustration of why a topic-led cumulative assessment is inadequate. Heavy clay soils influence infiltration and runoff; compaction changes agricultural drainage; cable trenches may intercept drains; piling may create groundwater pathways; HDD can affect surface and groundwater; contaminated soil may be mobilised; and concrete, oils, dewatering and BESS or transformer firewater introduce pollutant sources. Those pathways may all ultimately affect the same Principal Aquifer, private water supply or River Tas/Waveney-connected receptor. Chapter 19 should integrate them into one source–pathway–receptor model. It does not.	The Applicant refers the respondent to **Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** comment IDs BEPS-271 and BEPS-281. In relation to "*piling may create groundwater pathways; HDD can affect surface and groundwater; contaminated soil may be mobilised; and concrete, oils, dewatering and BESS or transformer firewater introduce pollutant sources*" it should be noted that the assessments of cumulative effects are undertaken assuming the specified embedded and additional mitigation measures are in place. This being the case, the Scheme will be designed (informed by the post-consent ground investigation, Foundation Works Risk Assessments, Hydrogeological Risk Assessments etc.) such that existing contamination in the ground will be identified and remediated where required, new deep piled foundations will be designed to not create contamination migration pathways, trenchless crossings will be designed to suitable depths and with appropriate control measures and drilling fluids, dewatering (if required) will be undertaken in accordance with the Environmental Permitting regime, design mitigation against

ID	Theme	Comments/Issues Raised	Applicant's Response
			release of firewater will be in place etc. Cumulative effects associated with these elements will therefore not occur.
WR-BEPS-216	Cumulative and In-Combination Effects Ecology and Biodiversity	Ecology also needs to be assessed by functional network rather than habitat label. The cumulative barbastelle receptor is the maternity-colony landscape: multiple colonies, overlapping Core Sustenance Zones, woodland, hedges, dark corridors, field margins and watercourses. It is exposed simultaneously to panel land-take, hedge gaps, lighting, noise, fencing, traffic, woodland-edge disturbance, cable routes and compounds. Six ancient woodlands directly adjoining the Scheme are similarly exposed not simply to direct loss but to enclosure, lighting, edge effects, disturbance, hydrological change and loss of connectivity. Farmland birds experience loss of open habitat combined with planting, fencing and construction disturbance. Roadside Nature Reserves and botanical corridors face repeated access works, widening, visibility splays and vegetation removal. Great crested	The impacts of the Scheme on ecology are fully assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** The Applicant refers to its response on barbastelle bats at BEPS-063, BEPS-064, BEPS-088, BEPS-099, BEPS-100, BEPS-216, and BEPS-217 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response on ancient woodland at BEPS-220 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response on farmland birds at BEPS-229 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response on Roadside Nature Reserves at SAG-015, WGRG-014, BEPSG-014, BEPS-212 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response on Great Crested Newts at GMAG-097 and GMAG-107 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

ID	Theme	Comments/Issues Raised	Applicant's Response
		newt populations depend upon pond-and-terrestrial networks which can be fragmented without any individual pond being destroyed. The River Tas system experiences HDD, sediment, runoff, groundwater changes, electrical crossings and construction disturbance. Chapter 19 does not adequately assess those functional systems as cumulative receptors.	The Applicant refers to its response on the River Tas at SAG-016, WGRC-015, BEPS-019, BEPS-082, BEPS-087, BEPS-092 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**
WR-BEPS-217	Cumulative and In-Combination Effects Cultural Heritage	The heritage case is similarly broader than simultaneous visibility. East Pye occupies historic agricultural ancient countryside containing churches, farmsteads, conservation areas, historic lanes and long-established relationships between settlement and countryside. Solar arrays, substations, pylons, highway interventions, traffic, lighting and screening vegetation progressively alter that landscape. Screening may hide some infrastructure but cannot restore an historic open field, recover tranquillity or reverse industrialisation of an approach to a church; in some circumstances	Technical assessments within the **ES [APP-042 to APP-056],** including the heritage assessment**,** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022]**, which includes all components of the Scheme. The assessments within the ES therefore consider the effects of the Scheme as a whole on receptors rather than individual elements or Sites in isolation.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the screening itself changes historic openness. Chapter 19 does not adequately assess that landscape-scale accumulation.	
WR-BEPS-218	Cumulative and In-Combination Effects Human Health	For residents, the 'receptor group' methodology is particularly unsatisfactory. A household does not experience landscape, noise, lighting, traffic and loss of tranquillity as separate technical topics. It experiences one altered place. During construction that may comprise HGV movements, piling or HDD noise, temporary lighting, road disruption, visual change, severance and repeated disturbance. During operation it may comprise a permanently changed landscape, substation or BESS noise, security lighting and loss of rural character. Chapter 19 largely identifies significant residential interaction only where already-significant visual and noise effects coincide. That misses the possibility that a significant visual effect combined with individually Minor traffic, lighting and noise effects may	The Applicant refers to its response to BEPS-467, BEPS-469, BEPS-470, BEPS-471, BEPS-472, BEPS-473, BEPS-474, BEPS-475, BEPS-476, BEPS-477, BEPS-478 relating to the in-combination effects assessment methodology within **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response to WR-BEPS-193 regarding the assessment of human health and wellbeing, which considers the combined effects across various environmental topics.

ID	Theme	Comments/Issues Raised	Applicant's Response
		produce a materially greater overall amenity burden.	
WR-BEPS-219	Cumulative and In-Combination Effects Recreation and Public Rights of Way	The same is true of PRoWs. Users of Boudicca Way, Via Beata and other routes may encounter arrays, substations, fencing, HGVs, crossings, temporary closures, diversions, lighting and loss of tranquillity during a single journey. For promoted and long-distance routes, the relevant cumulative receptor is the experience of the route, not each isolated crossing or viewpoint.	The Applicant notes the comment. In addition to the selection of view locations on the PRoW network which are considered in **ES Volume 1 Chapter 7 [APP-043]**, 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. In addition, the recreational routes highlighted are also considered. Furthermore to aid the understanding of effects for recreational users who may interact with the Scheme on multiple PRoW undertaking circular routes from settlements, a **Sequential PRoW Assessment [EN0110014/EXAM/9.36]** is submitted at Deadline 2.
WR-BEPS-220	Cumulative and In-Combination Effects Transport and Access	Transport needs a programme-level cumulative analysis. East Pye already depends on call-forward systems, holding areas, restricted delivery periods, one-HGV-at-a-time controls, school-related restrictions, AIL movements and narrow rural roads. Those controls must remain	The Applicant notes the concerns raised. The cumulative assessment presented within the Environmental Statement was undertaken in accordance with relevant ISEP guidance and considered the potential cumulative transport effects of the Scheme alongside other developments where there was evidence of commitment and the potential for overlap in both construction periods and the affected highway network. The approach to the identification and assessment of cumulative schemes was agreed with Norfolk County Council, and the

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		workable when several East Pye construction fronts operate concurrently and when Norwich to Tilbury, Tasway, housing and other projects use the same A47, A140 and local-road network. National Highways has sought greater granularity because a network may appear acceptable at strategic-link level while a particular junction, bridge, village lane or school route becomes the actual limiting constraint.	mitigation measures identified within the assessment were developed to account for these cumulative effects. The Applicant also notes that the construction traffic assessment adopts a robust worst-case approach. The assessment assumes that all areas of the Scheme could be under construction concurrently, thereby assessing the maximum potential traffic generation and associated effects. In practice, construction activities would be phased and staggered across the Scheme. As illustrated within Figure 2.1 of the **Outline CTMP [REP1-068]**, the construction programme is not based on all sites being built out simultaneously. The traffic assessment nevertheless assumes concurrent construction across the Scheme to ensure a robust worst-case assessment of potential effects.
WR-BEPS-221	Cumulative and In-Combination Effects Noise and Vibration	The cumulative noise evidence is also weaker than Chapter 19 suggests. Construction noise arises from HGVs, piling, general works and HDD; operational noise from substations, BESS, transformers and inverters; replacement and decommissioning bring further construction-type noise. South Norfolk Council specifically states that Chapter 19 cannot conclude that cumulative operational noise will be only Minor Adverse and Not Significant where the BESS and substation noise effects had not been	Construction noise from the Scheme, including piling, general construction works, HDD and construction traffic, is assessed in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The assessment uses activity and phase-based construction scenarios intended to represent the relevant reasonable worst-case effects. It identifies the elevated effects associated with activities such as piling and night-time HDD. Construction noise from Scheme would be controlled through the **Outline CEMP [REP1-058]**. The operational assessment includes contributions from the BESS, Project and National Grid substations, transformers and solar inverters. The subsequent evening assessment also considers these sources together, including the additional mitigation identified in **ES Volume 1, Chapter 12 – Noise**

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		adequately assessed. Its acoustic adviser considered that those installations could significantly affect amenity and potentially amount to statutory nuisance unless significant mitigation were provided.	**and Vibration [APP-048]**. Operational noise is controlled through the **Outline OEMP [REP1-060]**, which contains separate requirements for the BESS and other operational plant, together with monitoring and corrective mitigation provisions. The detailed OEMP is secured by Requirement 14 of the **Draft DCO [REP1-014]**.
WR-BEPS-222	Cumulative and In-Combination Effects Socio-Economics	The socio-economic treatment exposes another asymmetry. Chapter 19 is willing to combine projects when doing so increases employment and skills benefits, but is less precautionary about the corresponding competition for skilled workers, pressure on accommodation and private rental housing, tourism displacement, construction traffic, disruption to rural businesses and pressure on services. The same 47-scheme development pipeline cannot rationally be treated as a real cumulative opportunity when counting benefits but as too uncertain or remote when assessing burdens.	The Applicant refers to its response to WR-BEPS-204.
WR-BEPS-223	Cumulative and In-Combination Effects	Agricultural effects also need to be considered geographically rather than through national percentages. East Pye removes or disturbs	Agricultural statistics for Norfolk County Council and Breckland and South Norfolk LPA and South Norfolk are

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	Soils and Agricultural Land	substantial BMV and stewardship land. Other solar, grid, housing and infrastructure projects remove or disturb more in the immediate vicinity. The cumulative issue is the concentration of productive and conservation-managed land loss in the same small rural economy, together with repeated soil compaction, fragmentation of holdings and interference with agricultural drainage—not the proportion of England's total agricultural area represented by one project.	provided in Table 15.9 in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. Across Sites 1 – 10 and the BESS 829.1 ha of Best and Most Versatile (BMV) land has been found. The area of agricultural land in Norfolk is about 417,633ha. The total Order Limits for East Pye is 1,212 ha (this includes non-agricultural land) which is approximately 0.29% of the total agricultural land within Norfolk. To put this in context, currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) of Norfolk is not being cropped. The effect on food production and the related rural economy is not significant on a local, county, regional or national basis.
WR-BEPS-224	Cumulative and In-Combination Effects Electromagnetic Fields	EMF is another topic where Chapter 19 simply inherits an inadequate underlying assessment. There is no project-wide cumulative model of the combined electrical environment from East Pye's underground circuits, existing and diverted 400 kV overhead lines, substations, BESS, transformers and inverters, still less their interaction with Norwich to Tilbury or other surrounding electrical infrastructure. There is no hotspot mapping and no adequate	The Applicant refers to their response to WR_BEPS-170

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		cumulative aquatic assessment at electrical crossings. A cumulative chapter cannot cure the absence of the underlying scheme-specific model.	
WR-BEPS-225	Cumulative and In-Combination Effects Utilities	Utilities and major-accident risks likewise need synthesis. East Pye crosses or approaches National Gas Transmission infrastructure, water and sewer assets, telecommunications, railway infrastructure and existing electricity systems. Site 1 combines BESS, 400 kV infrastructure, overhead lines, railway, homes, groundwater, private supplies, fibre-optic cables, aviation and construction access. Site 5 combines major electrical infrastructure with gas infrastructure, hydrological pathways, private supplies and sensitive River Tas ecology. The question is whether the combined emergency scenario has been assessed—not merely whether each individual discipline has an outline management plan. Chapter 19 should provide the cross-	An assessment of the likely effects on utilities is provided in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054].** In addition, the Major Accidents and Disasters assessment presented within **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** also considers the potential for risk events associated with utilities damage / strike. Utilities data has been incorporated into the design of the Scheme and appropriate buffers will be embedded into the design. The **Outline CEMP [REP1-058]**, sets out measures to reduce potential impact on identified utilities. In advance of construction, the Applicant will liaise with all utility providers with assets in the Order Limits regarding construction timelines, activities, proximity to assets and construction management measures. Once infrastructure is in place, risk to the identified utilities is considered minimal. In addition, the **Draft DCO [REP1-014]** includes protective provisions for the protection of electricity, gas, water and sewerage undertakers, operators of electronic communications code networks, and drainage authorities.

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		hazard synthesis which is otherwise missing.	
WR-BEPS-226	Cumulative and In-Combination Effects Aviation	Tibenham Airfield similarly needs to be treated as one cumulative aviation receptor. The relevant future environment includes East Pye Solar arrays and substations to the north and east, Norwich to Tilbury pylons immediately to the west, Simpson's Maltings Solar to the south, Tasway Energy Park if it progresses to the north, cranes, lighting, glint and glare and progressive loss or alteration of emergency landing terrain. Each additional project may remove operational flexibility even if its individual obstacle or glare assessment appears acceptable. The cumulative question is whether a safe aviation environment remains around the airfield after the whole foreseeable development pattern is superimposed.	The Applicant refers to its response to WR-BEPS-176 for further information with specific reference to Tibenham Airfield.
WR-BEPS-227	Cumulative and In-Combination Effects	Chapter 19 also materially underestimates the temporal cumulative case. A 60-year NSIP is not simply 'construction → passive operation →	The technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],**

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		decommissioning'. The Scheme anticipates wholesale or substantial solar-panel replacement, repeated BESS replacement—potentially up to five cycles—transformer replacement and associated reuse of compounds, roads and lifting infrastructure. These are foreseeable intermediate construction phases involving renewed HGV traffic, noise, soil disturbance, waste, lighting and ecological disturbance. By the time they occur, mitigation habitats may have matured and become valuable receptors in their own right. They therefore need to be assessed as separate cumulative phases, not absorbed into 'operation'.	which includes all components of the Scheme, including operational phase maintenance and replacement activities. Operational road traffic information, including the nature of maintenance traffic, frequency and estimate movements during both maintenance and replacement activities are set out in the **Outline OTMP [APP-202].** The **Outline OTMP [APP-202]** also sets out transport-related mitigation which will be in place during the operational phase. Mitigation and control measures for the operational phase, including maintenance and replacement activities, are secured through the **Outline OEMP [REP1-060].**
WR-BEPS-228	Cumulative and In-Combination Effects Construction and Decommissioning	The assumption that decommissioning will simply be construction in reverse is equally unsafe. After six decades, the receiving environment will be different: mitigation trees and hedges may be mature, new habitats established, soils changed, climate conditions	The Applicant refers to its response to WR-BEPS-24. The effects of decommissioning are expected to be similar or of a lesser magnitude than construction effects, and are considered in the relevant sections of the ES. The specific method of decommissioning in the Scheme at the end of its design life is uncertain at present, as the engineering approaches to the decommissioning would evolve over the design life of the Scheme. Therefore, assumptions have been made where appropriate in the impact assessment in

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		altered, settlements expanded and some electrical infrastructure intended to remain. Decommissioning will also generate a different waste stream, involving removal or recycling of ageing solar, battery and electrical equipment. Removing infrastructure may damage mature mitigation habitats and soils; leaving it may prevent restoration. It is also unclear who will be responsible for decommissioning, and whether they will have adequate skills or funds to achieve this. That leads to a major internal inconsistency about the post-decommissioning end state. The National Grid Substation and some grid infrastructure may remain. Mature screening woodland and hedges may remain. BNG habitats may remain. Underground ducts, cables, foundations, drainage and access works may remain in whole or part. If those elements remain, the historic and agricultural landscape is not restored to its former	technical chapters of the decommissioning phase. An **Outline DEMP [REP1-062]** has been prepared and submitted with the DCO Application which sets out the general principles to be followed in the decommissioning phase of the Scheme. Waste would be managed in accordance with the relevant legislation and guidance at the time and in accordance with the **Outline DEMP [REP1-062].** The materials and waste assessment within **Chapter 18 – Other Environmental Matter** identifies potential waste steams associated with the decommissioning phase and assesses the potential impacts on landfill void capacity. Post-decommissioning, the landowners would choose how the land is to be used and managed, with the exception of the National Grid Substation and the Grid Connection Infrastructure. The landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Norfolk County Council in accordance with the **Outline DEMP [REP1-062].**

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		condition. If they are removed, further ecological, soil, traffic, waste and hydrological effects arise. Landscape, ecology, heritage, agriculture, soils and water cannot each assume a different end state because that produces the most favourable conclusion within that chapter. One defined removal-and-retention scenario is required across the ES.	
WR-BEPS-229	Cumulative and In-Combination Effects	The claimed Significant Beneficial operational ecological in-combination effect is also particularly vulnerable. Chapter 19 assumes that cessation of conventional farming, fertiliser and chemical inputs combined with habitat creation will produce ecological and water-quality benefits. But substantial parts of East Pye have already been subject to Countryside or Environmental Stewardship management. The existing baseline therefore includes conservation-managed fields, margins and habitat which already support substantial farmland-bird	The Applicant refers to its response to Action Point 6 within the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]** regarding land already within a countryside stewardship scheme. The Applicant refers to its responses in relation to barbastelle bats at BEPS-063, BEPS-064, BEPS-088, BEPS-099, BEPS-100, BEPS-216, and BEPS-217 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its responses to farmland birds at BEPS-229 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

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		populations. The Applicant records 81 skylark territories, 70 of them within areas of permanent development, together with other Red List breeding birds. Expiry of a stewardship agreement does not erase the ecological condition created by that management. The same claimed benefit is difficult to reconcile with the Applicant's own nationally important bat baseline and the peer-reviewed evidence cited in the WR showing reduced bat activity at operational solar farms, including along retained field boundaries. New grassland, hedges and reduced fertiliser inputs may produce some benefits, but they do not demonstrate that barbastelle maternity-colony function, open-land bird habitat, commuting routes or prey networks will remain equivalent. BNG cannot answer those species-specific functional questions. Chapter 19 therefore has not demonstrated a Significant Beneficial ecological effect; it has	

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		assumed one by comparing the Scheme with an oversimplified intensive-agriculture baseline.	
WR-BEPS-230	Cumulative and In-Combination Effects Scheme Description Ecology and Biodiversity Landscape and Visual	The broader design implication is the most important point in Chapter 19. East Pye Solar depends upon numerous mitigation systems working simultaneously: landscape planting, ecological buffers, drainage, highway controls, acoustic barriers, lighting restrictions, groundwater protection, firewater containment, aviation safeguarding, gas-pipeline requirements, BNG and eventual agricultural restoration. Yet many of those measures compete for the same physical space or create effects in another discipline. A new haul road may solve access while harming soils, hedges and drainage. A noise barrier may reduce sound but increase visual harm. Planting may screen infrastructure but harm open-country bird habitat or historic openness. Additional drainage may require more land. Retaining BNG habitat may prevent	The design process has been multidisciplinary and environmentally led. The **Design Approach Document [APP-212]** explains that environmental survey findings and technical assessments were used collectively to influence layout, buffers, mitigation areas and design changes throughout project evolution, with design decisions tested through a coordinated, multidisciplinary framework rather than through isolated topic assessments, allowing potential interactions or competing spatial requirement to be considered within the design. The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** are comprehensive and robust and are secured through various outline management plans **[REP1-058 to REP1-070]**. The outline management plans establish a framework for the details to be secured through the DCO Requirements. This enables the detailed design to be coordinated across the environmental topics, whilst retaining the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. The detailed design is also secured by DCO Requirement.

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		agricultural restoration. Chapter 19 assumes the separate mitigation packages will all work; it does not demonstrate that they can all coexist within one physical design.	
WR-BEPS-231	Cumulative and In-Combination Effects	That is why cumulative assessment becomes a question of site selection as well as EIA methodology. East Pye intersects a nationally important bat landscape, six directly adjoining ancient woods, extensive BMV agricultural land, sensitive heritage assets, chalk-stream systems, Principal Aquifers and private water supplies, constrained rural roads, aviation interests, National Gas infrastructure, existing and proposed grid infrastructure and quiet rural residential receptors. Several of those constraints occur together at the same Sites. The very density of mitigation required is evidence of the underlying environmental constraint of the location. A well-sited infrastructure project will require mitigation. The distinction at East Pye Solar is the extent to which environmental	The Applicant refers to the responses provided to Q1.1.1 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** in relation to the application of the mitigation hierarchy and WR-BEPS-230 of this document. The environmentally-led design approach, including the exclusion of statutory landscape and ecological designations is set out within the **Site Selection Assessment [APP-215]** and the design evolution of the Order Limits, is set out in the **Design Approach Document [APP-212] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041].**

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		acceptability depends upon numerous independent controls all succeeding simultaneously and without creating new effects elsewhere. At some point mitigation ceases to be refinement of an environmentally suitable project and becomes the mechanism by which an intrinsically over-constrained location is made to appear acceptable on paper. Chapter 19 provides substantial evidence that East Pye has crossed that line.	
WR-BEPS-232	Cumulative and In-Combination Effects	In conclusion: Chapter 19 does not demonstrate that the cumulative and in-combination effects of East Pye are acceptable. Its methodology systematically narrows the evidence before the cumulative question is asked: Negligible effects are removed; receptors are aggregated; the scale of interaction is expressly left unidentified; unresolved assumptions and deferred mitigation from Chapters 6–18 are imported unchanged; external projects are treated inconsistently; construction phasing is	The Applicant refers to its responses to WR-BEPS-194 to WR-BEPS-231.

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		insufficiently defined; replacement cycles are largely omitted; and decommissioning proceeds from an incoherent future baseline. Each weakness tends to suppress, rather than reveal, the environmental worst case.	
WR-BEPS-233	Cumulative and In-Combination Effects	More fundamentally, Chapter 19 fails the test it should have been designed to answer: whether there is one physically deliverable East Pye design in which access, drainage, groundwater protection, landscape mitigation, ecological connectivity, heritage protection, agricultural restoration, noise control, aviation safeguarding, utilities, fire safety and decommissioning can all be achieved simultaneously. The Environmental Statement contains numerous topic-specific mitigation solutions, but it has not demonstrated that those solutions are mutually compatible. That is not merely a deficiency in presentation; it goes to whether an environmentally coherent Scheme actually exists within the DCO envelope.	The Applicant refers to its responses to WR-BEPS-194 to WR-BEPS-231.

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WR-BEPS-234	Cumulative and In-Combination Effects	The concentration of cumulative constraints is itself material evidence of poor site selection. The same receptors are repeatedly subjected to different parts of East Pye and to a wider development pattern of solar, BESS, transmission infrastructure and housing. The Applicant cannot obtain a reliable 'Not Significant' conclusion by dividing that physical reality into small effects, separate chapters, broad receptor groups and different project boundaries. Receptors experience one East Pye Solar Scheme, not nineteen Environmental Statement chapters. Accordingly, the repeated 'Not Significant' conclusions in Chapter 19 should be afforded little weight unless the Applicant provides a genuinely receptor-led, spatially and temporally quantified cumulative assessment; models a realistic maximum simultaneous construction case; includes reasonably foreseeable external development on a consistent basis; resolves the mitigation	The Applicant refers to its responses to WR-BEPS-219 to WR-BEPS-231.

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		conflicts between technical disciplines; assesses replacement and decommissioning against coherent future baselines; and demonstrates at least one complete design in which every relied-upon environmental control can actually coexist. If that exercise identifies the need for substantial relocation, reduction or removal of development, that is evidence that the present Scheme is not environmentally acceptable as designed. Unless those defects can be remedied within the Examination without materially altering the assessed project, Chapter 19 materially supports refusal of development consent.	
WR-BEPS-235	Residual Effects	The Applicant's Final Summary Does Not Represent the True Environmental Balance Chapter 20 exposes the central weakness in the Applicant's environmental case. It presents a strikingly asymmetric final picture: extensive Significant adverse landscape and visual effects are expressly acknowledged, yet almost every other environmental	The Applicant refers to its responses to BEPS-479, BEPS-485, BEPS-487 and BEPS-488 within **Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].**

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		topic is reduced to 'no significant residual effect' once mitigation is assumed. At the same time, substantial beneficial effects are attributed to ecology, water quality, employment, skills and climate. That outcome is difficult to reconcile with either the Applicant's own underlying evidence or the continuing concerns of statutory and specialist consultees. Chapter 20 is therefore not an independent confirmation that the Scheme is environmentally acceptable. It is the end-product of the assumptions, significance judgments, incomplete baselines and mitigation dependencies contained in the preceding chapters.	
WR-BEPS-236	Residual Effects Landscape and Visual	The Applicant's own landscape evidence provides the clearest test of scale. Chapter 20 records Significant construction effects across NCA 83 South Norfolk and High Suffolk Claylands, the Tas Rural River Valley, Tas Tributary Farmland, Chet Tributary Farmland, Thurlton Tributary	NPS EN-1 states at para 5.10.5 that 'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape', and at para 5.10.13 that 'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'. The Applicant acknowledges that the Scheme would introduce changes to the landscape and visual amenity, and

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		Farmland with Parkland and Great Moulton Plateau Farmland. Sites 1, 7 and 8 experience Major Adverse landscape effects, while residents, PRoWs and promoted recreational routes experience repeated Major or Major-to-Substantial visual effects. The operational assessment remains materially adverse: Major effects occur at the BESS area, Site 1 and Site 8, with widespread Moderate effects elsewhere. Even at Year 15, Significant effects remain on Tas Tributary Farmland, Great Moulton Plateau Farmland, Sites 1, 7 and 8 and numerous residential, recreational and PRoW receptors. That is not evidence of a development whose impacts have been successfully absorbed by the landscape. It demonstrates landscape-scale transformation which remains significant after fifteen years of planting and mitigation. The planting relied upon to screen the development is itself part of that transformation. Existing open and semi-open	that significant effects are identified and would remain at Year 15. These are reported transparently in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and **ES Volume 1, Chapter 20 – Summary of Significant Residual Effects [APP-056].** The Applicant has however 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. 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].** Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A **Green Infrastructure Strategy [REP1-013]** has also been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. The baseline demonstrates that the

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		agricultural relationships between villages, medieval churches, farmsteads, lanes, woodlands, hedgerows and river valleys in this area of ancient countryside are replaced by a deliberately engineered landscape of screening woodland, new hedges, energy infrastructure and enclosed fields. Reduced visibility of panels after fifteen years is therefore not equivalent to restoration of landscape character. The Applicant's own conclusions establish that East Pye would require the South Norfolk landscape to be substantially and enduringly reorganised around the Scheme.	landscape within which the Scheme is located contain a varied pattern and structure with fields, hedgerows, hedgerow trees, tree belts and woodland blocks component features. These features create local enclosure and framed or wooded views, and new measures would provide visual additional screening and aid integration of the scheme within the landscape. 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-BEPS-237	Residual Effects Landscape and Visual Cultural Heritage	That admitted landscape transformation provides the proper context for the much more optimistic conclusions reached elsewhere in Chapter 20. The historic environment is the most obvious example. Chapter 20 reports no significant residual cultural-heritage effect even though Historic England describes	The Applicant considers that **ES Volume 1, Chapter 20 - Summary of Significant Residual Effects [APP-056]** provides an accurate summary of the Scheme's residual significant effects, with further detail provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].**

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		an extensive agricultural historic landscape containing important rural churches, listed buildings and small conservation areas centred on medieval settlement. Its application-stage evidence identifies concerns involving a Scheduled Monument, two Grade I buildings, two Grade II* buildings, 42 Grade II buildings and four Conservation Areas, acknowledges residual policy harm and confirms that parts of the Order Limits remain incompletely archaeologically evaluated.	
WR-BEPS-238	Residual Effects Landscape and Visual Cultural Heritage	The difficulty is not simply that some individual heritage judgments are disputed. Landscape and heritage describe the same physical place. A Scheme which the Applicant accepts will cause Major and long-term landscape change around medieval settlements, rural churches and historic farmsteads cannot rationally be treated as having no meaningful residual historic-environment consequence merely because individual asset	The Applicant refers to its response's provided to Block East Pye Solar's relevant representation [RR-0200] in **The Applicant's Response to Relevant Representation Part 3 – Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** under comment ID BEPS-283.

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		effects have been placed below an EIA significance threshold. Setting is not limited to direct visibility. It includes the relationship between an asset and its rural surroundings, approaches, openness, tranquillity, historic land use and the spatial relationship between church, village, lane and field. Screening may reduce the visibility of panels while itself damaging that openness. Archaeological recording similarly preserves information, not the archaeological resource which is destroyed. Where parts of the cable corridor and other land remain unevaluated, the final residual effect cannot properly be treated as settled before it is known whether archaeology requiring preservation in situ exists.	
WR-BEPS-239	Residual Effects Ecology and Biodiversity	The ecological conclusions are still more difficult to sustain. Chapter 20 predicts no Significant adverse construction or decommissioning ecological effect, but assigns Moderate Beneficial operational effects to bats, skylark,	The impacts of the Scheme on ecology are fully assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** The Applicant refers to its responses in relation to barbastelle bats at BEPS-063, BEPS-064, BEPS-088, BEPS-099, BEPS-100, BEPS-216, and BEPS-217 within **Response to**

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		hedgerows, ponds, rivers, woodland, badger, water vole and otter. That conclusion sits uneasily with the Applicant's own finding that the bat assemblage is of national importance, with widespread barbastelle activity and multiple maternity colonies whose Core Sustenance Zones overlap the entire development landscape. The relevant receptor is not an isolated roost or retained hedge but an existing functioning network of maternity colonies, satellite roosts, ancient and other woodland, mature trees, hedgerows, dark corridors, ponds, watercourses and foraging habitat. The specialist evidence shows that this network is not yet fully understood. The Norfolk Barbastelle Study Group confirmed a maternity colony at Little Wood, with a pre-parturition emergence count of 36 and an estimated post-parturition colony of approximately 55 bats, identified evidence of probable additional maternity colonies and called for further radiotracking and woodland	**Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its responses to WR-BEPS-064 for the Applicant's responses in relation to botanical surveys. The Applicant refers to its responses to WR-NE-004 within the **Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies [EXAM/9.29]** for Natural England's response regarding protected-species licensing.

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		investigation. Other woodlands contain known maternity colonies while others remain insufficiently surveyed. There has also been no proper full botanical survey, notwithstanding the risk to roadside verges, hedgebanks, field margins and other semi-natural habitats directly exposed to highway, access and cable works. Norfolk Wildlife Trust continues to require additional information and design refinement before it considers the Scheme ecologically acceptable, while Natural England continues to treat protected-species licensing as an unresolved matter. It is therefore premature to describe the operational effect on bats and other ecological receptors as beneficial before the complete functional baseline and the effectiveness of the mitigation have been established.	
WR-BEPS-240	Residual Effects Ecology and Biodiversity	The claimed ecological benefits also conflate habitat quantity with ecological function. Conversion of arable land to grassland, additional woodland and hedgerow planting may produce habitat	The Applicant acknowledges this comment and provides a full Ecological Impact Assessment within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** The Scheme has been subject to an environmentally-led design approach that ensures that all relevant and appropriate steps have been taken to achieve good design

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		units, but a BNG metric does not demonstrate functional equivalence. Existing Countryside Stewardship land already performs ecological functions for farmland birds. Lapwing require extensive open ground and sightlines; skylark require open nesting and foraging habitat; turtle dove require particular combinations of nesting vegetation, seed-rich habitat and water. Enclosing those areas with panels, fencing and woody planting cannot automatically be characterised as an ecological improvement simply because the post-development habitat receives a higher metric score.	with the hierarchical mitigation approach adopted being to avoid where practicable, effects through the overall design and layout of the Scheme; reduce effects as far as practicable through the **Green Infrastructure Strategy [REP1-013].** See further response regarding Countryside Stewardship land within **WR-BEPS-135.** See the **Outline Protected Species Mitigation Strategy [REP1-050]** which provides a ground-nesting bird mitigation strategy.
WR-BEPS-241	Residual Effects Ecology and Biodiversity	The same applies to bats. A mature hedgerow connecting maternity roosts to established feeding habitat cannot be replaced instantly by an equivalent number of metres of new hedge elsewhere. Its value depends upon location, maturity, darkness, continuity, tree structure and its relationship with the wider colony network. Norfolk Wildlife Trust	The **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. Data purchased from the Norfolk Barbastelle Study Group to inform these reports, included GPS/radio tracking study data which revealed that local individual Barbastelles readily cross barriers much greater than the small (temporary)

ID	Theme	Comments/Issues Raised	Applicant's Response
		expressly questions the assumption that relatively small hedge breaks are harmless to barbastelle movement. There is an unavoidable temporal deficit where replacement habitat takes decades to acquire the function which existing habitat possesses at the point of loss. Ancient woodland relationships, veteran-tree systems and long-established dark commuting routes are still less replaceable.	hedgerow breaks referenced here, which includes bats regularly passing over road networks including the A140. The embedded design principles adopted and detailed within **Design Principles, Parameters and Commitments [REP1-078]** and **ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]**, include minimum design offsets which will be applied to ancient woodland (30m); veteran and ancient trees (15x stem width or 5m - whichever is greater); woodland (15m), hedgerows (10m); and ponds (30m); which would avoid impacts to roosting bats, whilst also maintaining access to and along features used for commuting and foraging. Measures for the protection of roosting bats in trees are included in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050]**. Further mitigation measures are set out in the **Outline CEMP [REP1-058]**, the **Outline OEMP [REP1-060]** and the **Outline LEMP [REP1-064]**. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats; ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and approved in accordance with the relevant Requirements of the **Draft DCO [REP1-014]**. The **Biodiversity Net Gain Report [APP-218]** which will be secured through Requirement 9 of the **Draft DCO [REP1-014]** identifies the Scheme can deliver an increase of 31.35% net gain for hedgerows which will increase the abundance of valuable habitats for bats within the DCO Limits.

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WR-BEPS-242	Residual Effects Water Environment Ground Conditions	Chapter 20's treatment of water demonstrates the same optimism. It reports no Significant residual construction effect but assigns a Major Beneficial operational effect, principally because conventional agricultural fertiliser and chemical inputs are expected to decline. That potential benefit cannot be considered in isolation from the unresolved risk pathways created by the development itself. The Environment Agency has raised issues concerning groundwater–surface-water interaction, piling and deep foundations, underground cabling, watercourse crossings, pollution prevention, BESS and substation design, private and public water supplies, historic contamination, fisheries and aquatic ecology. Foundation Works Risk Assessments and some HDD hydrogeological assessments remain deferred until after consent.	The Applicant refers its response to BEPS-271 and BEPS-281 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The assessments presented in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** and **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** have been undertaken in accordance with the methodology agreed with the Environment Agency. As agreed with the Environment Agency, the ground investigation and associated interpretative assessments, including Foundation Works Risk Assessment etc., can be undertaken post-consent.
WR-BEPS-243	Residual Effects Water Environment	The drinking-water baseline is particularly important. The Environment Agency originally identified 35 private water supplies	The Applicant refers to its response to WR-BEPS-070 within this document and to BEPS-271 and BEPS-281 in **The Applicant's Response to Relevant Representations Part 3**

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	Ground Conditions	within 250 m whose precise locations and/or abstraction strata were uncertain and required consideration over greater distances because of the Principal Aquifer setting. Six licensed groundwater abstractions occur within 1 km, including a public-water-supply borehole whose Source Protection Zone extends into the Scheme area. Proximity mapping does not establish abstraction depth, groundwater flow direction, hydraulic connectivity, contaminant travel time or whether piling, trenching, HDD, altered recharge or a pollution incident could create a pathway to a supply.	**- Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPS-244	Residual Effects Water Environment Ecology and Biodiversity	The LLFA also continues to question impermeable-area assumptions, infiltration evidence and drainage information in a landscape containing downstream communities with existing flood problems. The Environment Agency has unresolved concerns about fish, European eel, aquatic invertebrates, watercourse crossings and pollution control.	The Applicant refers to its response to BEPS-271 and BEPS-281 in **The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]** for matters relating trenching, transformers, oil pollution, firewater etc. Dialogue is currently ongoing with the LLFA and the Applicant is progressing a Statement of Common Ground with NCC **[REP1-085]** in which the status of discussions are recorded. The first draft has been submitted at Deadline 1.

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		Reduced agricultural fertiliser use may therefore be beneficial in one respect, but it cannot neutralise possible effects from soil compaction, drainage alteration, piling, dewatering, cable trenching, HDD, transformer oil, BESS pollutants, firewater or sediment. Chapter 20 effectively credits the benefit before the Applicant has demonstrated control of the competing harms.	Ground investigations including infiltration testing will be undertaken at selected locations across the Order Limits during the Examination Period. Notwithstanding the results of these investigations/testing, the Applicant has updated **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [REP1-052 and REP1-054]** to provide further information on the proposed surface water drainage strategy arrangements as follows: • Modelling of attenuation within InfoDrainage for the Project Substations within Sub-Sites 4B, 5A, 7F and 10C; • Modelling of a length of access track swale in InfoDrainage for Sub-Site 4B; • Provision of drawings showing above attenuation and indicative outfalls to adjacent ditches; • Conceptual drawings showing routes of swales and indicative outfall locations to adjacent ditches. The Applicant refers to its response to the EA on matters including European eel, aquatic invertebrates, fish, watercourse crossings, and pollution control within **The Applicant's Response to Submissions Received at Deadline 1 - Statutory Bodies [EN0110014/EXAM/9.29].**
WR-BEPS-245	Residual Effects Soils and Agricultural Land	The soils conclusion contains an equally important internal contradiction. The Applicant itself accepts 'irreversible loss or	**ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]** concludes that during the construction phase of development to be a moderate adverse significant effect on Soils and Agricultural Land in line with **ES**

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		downgrading' of BMV agricultural land as a Moderate Adverse Significant effect. The WR records approximately 829.1 ha of surveyed BMV land within the solar Sites, approximately 78.7% of that surveyed area. Natural England continues to seek complete ALC information for the Cable Route Corridor, avoidance of peat, avoidance of permanent infrastructure on BMV land and adequate soil safeguards. Yet Chapter 20 thereafter presents operational and decommissioning soil effects largely as non-significant and reduces wider agricultural consequences to Minor Adverse. That distinction is artificial. The Scheme would affect slowly permeable and structurally vulnerable soils through initial construction, haul routes, compounds, trenching, soil storage, permanent tracks, drainage interference and foundation works. It then permits future panel replacement, repeated BESS replacement and	**Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. During the operation phase ES Chapter 20 concludes there is no significant residual effects on Soils and Agricultural Land, in line with ES Chapter 15. At the decommissioning phase of the development Chapter 20 concludes there is no significant residual effects on Soils and Agricultural Land, in line with ES Chapter 15. The Applicant notes the comment regarding the CRC survey and refers to its response at WR-BEPS-136. The ISEP Guide *"A New Perspective on Land and Soil in Environmental Impact Assessment"* defines a "*temporary, reversible loss of soil-related features"* as a low magnitude impact. The Guide does not distinguish between short-term and long-term temporary or reversible loss. The footnote to Table 15.4 of the ISEP Guide notes that "*temporary developments can result in a permanent impact if resulting disturbance or land use change causes permanent damage to soils"* Methodologies for restoration and mitigation are set out within the **Outline SRMP [APP-204]** and will be developed further within the detailed Soil Management Plan (SMP), which is secured through Requirement 18 of the **Draft DCO [REP1-014],** to ensure that soils and agricultural land quality are appropriately protected. The detailed SRMP must be

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		other heavy maintenance before decommissioning. Temporary occupation does not mean temporary soil effect: Natural England itself recognises that temporary construction works can cause permanent ALC degradation. Nor is a commitment to restore land to comparable agricultural condition proof that the existing grade will actually be recovered after six decades of altered management and repeated disturbance.	substantially in accordance with the **Outline SRMP [APP-204]**
WR-BEPS-246	Residual Effects Construction and Decommissioning	This feeds directly into Chapter 20's reliance on the description of East Pye as 'temporary'. Sixty years is not a short environmental interval. The Applicant anticipates full panel replacement and potentially up to five BESS replacement cycles. Those are foreseeable construction-like phases involving renewed traffic, lifting equipment, compounds, waste movements and disturbance. During the same period mitigation woodland and hedgerows may mature, ecological communities may reorganise, soils	The Applicant refers to its response to WR-BEPS-22. The Applicant does not agree that the operational lifetime of the Scheme gives rise to unacceptable uncertainty. The Environmental Statement assesses the Scheme over its full operational life, including maintenance, replacement and decommissioning activities, on a reasonable worst-case basis within the parameters secured through the **Draft DCO [REP1-014]** and associated control documents. The potential replacement of panels, electrical equipment and battery storage infrastructure represents a foreseeable element of long-term energy infrastructure and has been considered within the assessment framework for the Scheme. The Applicant also does not agree that the description of the Scheme as temporary is inappropriate. The Scheme comprises a time-limited development (excluding the National

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		and drainage may change and settlements and infrastructure around the Scheme may evolve.	Grid Substation and Grid Connection Infrastructure) with a defined operational period and decommissioning requirements secured through the **Draft DCO [REP1-014]**. Whilst environmental conditions may evolve over time, the assessment has been undertaken in accordance with established EIA practice and considers the likely significant effects of the Scheme throughout its lifecycle, including operation, maintenance, replacement and decommissioning.
WR-BEPS-247	Residual Effects Scheme Description	Moreover, the Scheme is not wholly temporary. The National Grid Substation and elements of the grid connection are expected to remain. Underground ducts, joint bays or foundations may remain in the ground; foundations may be cut off below ground rather than completely removed; permanent access and drainage associated with retained transmission infrastructure may remain; and mature mitigation planting may itself be retained. The proposed National Grid compound is substantial and new or replacement pylons may remain as part of the transmission network. The post-decommissioning landscape therefore cannot simply be	**ES Volume 1, Chapter 4 - The Scheme [REP1-022]** clearly sets out that 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. The management of all planting for the National Grid Substation will be the responsibility of National Grid Electricity Transmission, and this will remain in place post decommissioning of the Scheme as it will form part of the transmission network. The assessments in the ES have been undertaken on this basis, and the Applicant acknowledges that the post-decommissioning landscape will not revert to the pre-development baseline due to the National Grid Substation and Grid Connection Infrastructure which will remain in-situ.

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		assumed to revert to the pre-development baseline.	
WR-BEPS-248	Residual Effects	The distinction is important: removability of solar panels is not reversibility of environmental change. Historic openness cannot necessarily be recreated after sixty years. Archaeological remains cannot be reinstated after excavation. Ancient ecological relationships and mature commuting corridors cannot be recreated on demand. BMV soils may not recover if their structure or drainage is permanently altered. Damage to a vulnerable aquifer or drinking-water supply may be difficult or impossible to reverse. Countryside Stewardship habitat and community experience of tranquillity cannot retrospectively be restored for the generation which experiences the development. Some effects therefore require avoidance rather than progressively more elaborate mitigation.	The Environmental Statement assesses the likely significant effects of the Scheme throughout its lifecycle, including operation, maintenance, replacement activities and decommissioning. Decommissioning measures are secured through the **Outline DEMP [REP1-062]** and the **Draft DCO [REP1-014]**. The assessment does not assume that all environmental receptors will simply revert to a pre-development baseline, but rather considers the likely effects of the Scheme, considering the embedded mitigation and control measures in accordance with established EIA practice. The Applicant refers to the responses previously provided under Q1.1.1 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** in relation to the application of the mitigation hierarchy, including avoidance.
WR-BEPS-249	Residual Effects	Transport demonstrates a different but equally important problem with	The Applicant notes that the conclusion within **ES Volume 1, Chapter 20 – Summary of Residual Significant Effects**

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	Transport and Access	Chapter 20's use of 'Not Significant'. Chapter 20 predicts no Significant residual construction transport effect, yet National Highways maintains a formal objection requiring further evidence on the A47/A140 junction, cumulative construction traffic, worker travel and Requirement 15. At local level, important routeing and access issues remain concerning Sites 7–10, Hall Lane, passing places, highway boundaries, vegetation clearance, local geometry and AIL delivery. An AIL route illustrates why EIA significance and physical deliverability are not the same question. A large transformer cannot be divided into smaller deliveries. If no route is physically capable, structurally suitable, legally available and environmentally acceptable, the component cannot reach its destination. Traffic management cannot solve that binary problem. Nor can a new internal haul road automatically be treated as	**[APP-056]** that there would be no significant residual transport effects reflects the outcome of the Environmental Impact Assessment undertaken in accordance with the agreed assessment methodology. The existence of matters requiring ongoing discussion or approval does not, in itself, indicate that significant residual environmental effects would arise. Concerns relating to routeing, access arrangements, highway boundaries, passing places, vegetation management and the delivery of AILs have been considered as part of the assessment and Scheme design process. Construction HGV routes and AIL routes have been identified and assessed, with AIL routes subject to review by a specialist abnormal load transport consultant. The traffic flows assessed within the Environmental Statement do not include AIL movements. Given their infrequent nature, AIL movements have been considered separately through a dedicated route assessment and would be managed through appropriate traffic management measures and route-specific controls. The Applicant therefore considers that the matters identified do not alter the conclusions of the Environmental Statement, which assessed the residual transport effects of the Scheme as not significant.

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		mitigation where it requires additional land, hedge removal, drainage works, soil compaction, watercourse crossings or ecological disturbance. Chapter 20's single 'no significant residual effect' conclusion obscures rather than resolves those interactions.	
WR-BEPS-250	Residual Effects Other Environmental Matters Aviation	The 'Other Environmental Matters' conclusion is similarly over-compressed. Norfolk Gliding Club continues to identify four separate aviation-safety mechanisms at Tibenham—glint and glare, thermal updrafts, engine failure after take-off and bird strike—and argues that only the first has been substantively addressed by the Applicant's aviation consultant. These concerns concern operational safety, including emergency landing opportunities, rather than merely visual amenity. National Gas likewise continues to require satisfactory protective provisions for the FM05 Yelverton–Stowmarket high-pressure feeder main and associated cathodic-protection equipment. The Scheme places	The Applicant refers to its response to WR-BEPS-176 for further information with specific reference to Tibenham Airfield, and WR-BEPS-225 on utilities.

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		major new high-voltage infrastructure, gas infrastructure, BESS, aquifers, private water supplies, residential receptors and aviation interests into overlapping physical environments. Low probability does not make a credible high-consequence event environmentally irrelevant.	
WR-BEPS-251	Residual Effects	A further systemic problem is Chapter 20's reliance upon mitigation which is not yet final. Residual effects are meaningful only after the measures relied upon to produce them have been adequately defined, demonstrated to be effective and legally secured. Yet important Ground Investigation and Foundation Works Risk Assessments remain post-consent; some HDD hydrogeological assessment is deferred; access arrangements remain subject to further agreement; ecological protection depends upon later detailed plans; lighting controls are not fully fixed; drainage remains subject to detailed design; archaeological mitigation depends upon further	The Applicant refers to its response to BEPS-110, BEPS-112, BEPS-119 within **The Applicant's Response to Relevant Representations Part 3 – Other Statutory Bodies, Undertakers, and Notable Parties [PDA-010]** regarding the adequacy of Chapter 2, the use of outline management plans, and the Rochdale Envelope approach.

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		evaluation; replacement and decommissioning arrangements remain incomplete; and statutory undertaker protective provisions continue to be negotiated.	
WR-BEPS-252	Residual Effects	The Environment Agency goes further. Its Relevant Representation identifies permitted preliminary works which are not adequately covered by the CEMP, creating what it describes as an unmitigated risk of environmental harm, and objects to drafting such as 'substantially in accordance with' where it weakens control. National Gas continues to seek protective provisions; National Highways seeks stronger requirements and additional evidence; Historic England seeks further archaeological investigation. These are the very controls upon which the Applicant's final Not Significant conclusions depend. A predicted future mitigation outcome is not yet an established residual effect.	The Applicant has continued to engage constructively with the Environment Agency and will submit a **Permitted Preliminary Works Environmental Management Plan (PPWEMP) [EXAM/9.32]** at Deadline 2 to provide additional control over permitted preliminary works. The purpose of the PPWEMP is to provide additional control and clarity in relation to permitted preliminary works and their environmental management; it does not arise from the identification of previously unassessed significant effects. This reflects the ongoing refinement of environmental controls during Examination rather than the existence of previously unassessed significant effects. The ES assesses the Scheme on a reasonable worst-case basis, with mitigation secured through the **Draft DCO [REP1-014]** and associated management plans.
WR-BEPS-253	Residual Effects	Chapter 20 also fails to capture the burden experienced by actual receptors because it summarises	The Applicant refers to its response to WR-BEPS-023.

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		by technical discipline. A resident experiences changed landscape, HGV traffic, noise, lighting, road disruption and loss of tranquillity together. A medieval church experiences new arrays, substations, traffic, road works, noise, screening vegetation and loss of open agricultural setting together. A barbastelle colony experiences lighting, hedge severance, disturbance, woodland-edge change, fencing, altered prey resources and vehicle movements together. A private water supply may be exposed simultaneously to altered recharge, piles, trenches, contaminant mobilisation, drainage changes and transformer or BESS pollution pathways. A chalk stream receives runoff, sediment, groundwater changes, cable crossings, HDD and accidental pollution through one connected system. Separating those effects into individually Minor or Not Significant categories can materially understate the aggregate receptor experience.	

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WR-BEPS-254	Residual Effects Cumulative and In-Combination Effects	External cumulative effects compound that defect. South Norfolk Council and Norfolk County Council have identified Tasway Energy Park, Norwich to Tilbury and the wider concentration of solar, BESS, transmission and infrastructure development as matters requiring assessment. The LLFA has specifically supported inclusion of proposed but unconsented solar and BESS projects because similar construction programmes may overlap and because cumulative drainage and flood consequences may extend downstream beyond individual project boundaries. Historic England has identified cumulative interaction with Tasway, while National Highways considers the cumulative construction-traffic evidence insufficiently granular. Uncertainty about the exact programme of another development is not evidence that cumulative effects do not arise. Tasway Energy Park may affect the same Great Moulton/Tivetshall	The Applicant will continue to discuss the list of cumulative schemes with NCC and SNC as the examination progresses. The Applicant refers to its response to BEPS-034 on the approach to Tasway Energy Park **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** Norwich to Tilbury is included within the cumulative developments list provided at **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116],** and the cumulative effects have been considered as appropriate within each technical chapter.

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		landscape, roads, ecological systems, heritage receptors and aviation environment. Norwich to Tilbury is a major linear transmission project with potential effects upon many of the same landscapes, roads, hedgerows and historic settings. Housing growth and other infrastructure add further pressure upon labour, accommodation, road capacity, drainage and settlement character. Reasonably foreseeable scenarios should therefore be tested rather than excluded because programme overlap is uncertain.	
WR-BEPS-255	Residual Effects Socio-Economics	Chapter 20 is also materially asymmetric in its treatment of benefits and harms. Adverse effects are repeatedly reduced because planting will mature, mitigation is expected to work, impacts are temporary or later controls will be agreed. Benefits are treated with much greater certainty even where they depend upon equally uncertain future events.	The proposed management and mitigation measures relied upon in the ES are secured through various outline management plans which are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** The approved detailed management plans must be substantially in accordance with the outline management plans. The final plans will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultees, 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 submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental

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		Construction employment in South Norfolk is classified as Major Beneficial and skills as Moderate Beneficial, while the underlying evidence indicates much weaker resident-based employment benefit. South Norfolk Council's evidence recorded that, of an earlier estimate of 1,006 direct and indirect jobs, only 73 were expected to be filled by South Norfolk residents and 501 from outside the region. There are no binding local-employment percentages or equivalent secured outcomes commensurate with the weight claimed.	Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur). **ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** anticipates that a large proportion of the Scheme's workforce would be drawn from outside the local authority and region (Table 14.22). Given the specialised nature of the construction workforce for energy projects, this represents a realistic approach. This is reflected in the finding that there would not be a significant impact on resident-based employment. 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-BEPS-256	Residual Effects Socio-Economics	Tourism is reduced to Minor Adverse notwithstanding the rural visitor economy associated with churches, the Waveney Valley,	With respect to impacts on tourism, the Applicant refers to its response provided under comment ID BEPS-387 in **The Applicant's Response to Relevant Representations Part 3**

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		Boudicca Way, walking, cycling and riding, countryside accommodation and heritage. Ecological benefits are treated as established although the botanical and barbastelle baselines remain incomplete and no account has been taken of potential harm to them. Water benefit is treated as Major despite outstanding regulatory concerns. Climate benefit is treated as secure despite the unresolved whole-life GHG accounting, replacement assumptions, grid-intensity assumptions, BESS position and uncertainty over actual exported electricity identified in Chapter 6. The same evidential rule should apply to both sides of the balance: a claimed effect should receive weight according to whether it is demonstrated, deliverable and secured.	**- Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The Applicant provides a full Ecological Impact Assessment within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].** The Applicant refers to its response to barbastelle bats at BEPS-063, BEPS-064, BEPS-088, BEPS-099, BEPS-100, BEPS-216, and BEPS-217 within **Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010].** The Applicant refers to its response to WR-BEPS-064 in relation to botanical baseline surveys. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters of the Scheme. The Environmental Statement therefore assesses the likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme. The proposed management and mitigation measures set out in the **ES [APP-036 to APP-195]** are secured through various outline management plans **[APP-196 to APP-205].** The mitigation measures are identified in light of the effects identified during the assessments.
WR-BEPS-257	Residual Effects	That leads to the central planning point in Chapter 20. BEPS accepts the strong national policy support for renewable electricity and does not contend that the Applicant is required to establish generic	The Applicant refers to its response to WR-BEPS-003. The Applicant considers that the application materials and ES **[APP-036 to APP-056]** provide a clear description of the Scheme components, a robust assessment of the environmental impacts of the Scheme, a comprehensive suite of secured mitigation and control measures, and clearly set

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		national need for renewable generation. The August 2026 NPPF W3 expressly gives substantial weight to relevant energy-security, economic-development and net-zero benefits and says that applicants should not generally be required to demonstrate generic renewable-energy need. But that does not determine the weight to be given to every benefit claimed for this particular Scheme. The decision still requires an evidential assessment of what East Pye would actually deliver, which components are reasonably capable of being implemented, what environmental effects the DCO would authorise, whether those effects have first been avoided where reasonably possible, and what residual harms remain after secured mitigation.	out the residual effects remaining after application of secured mitigation.
WR-BEPS-258	Residual Effects	The Applicant's alternatives exercise treated approximately 500 MW as the project premise and assembled a dispersed land package before the eventual Great Moulton connection strategy was	The Applicant refers to its response to WR-BEPS-041 to 043.

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		established. ISH1 has now confirmed that four of six site-selection stages had already been undertaken around Norwich Main and that the exercise was not restarted from Great Moulton. The Applicant also confirmed that the dispersed form contributes to the requirement for multiple substations and extensive interconnecting infrastructure. Those matters make it necessary to distinguish harms intrinsic to renewable generation from harms arising from the Applicant's selected configuration.	
WR-BEPS-259	Residual Effects	The current NPPF reinforces rather than displaces that enquiry. N2 requires the environmental qualities and agricultural grade of the selected land to be considered and significant biodiversity harm first to be avoided through location on an alternative site with less harmful impacts; DP3 and DP4 require context-responsive design throughout project evolution; and the heritage, flood-risk, pollution and PRoW policies impose their	The Applicant refers to its response to WR-BEPS-003, WR-BEPS-020, WR-BEPS-029, WR-BEPS-044, WR-BEPS-057, WR-BEPS-074, WR-BEPS-142.

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		own receptor-specific requirements.	
WR-BEPS-260	Residual Effects	The proper planning balance is therefore not between East Pye's harms and 'net zero as a whole', nor does it depend upon BEPS proving that renewable energy is unnecessary. It is a balance between the general nationally recognised benefits properly attributable to transmission solar and the particular adverse effects, uncertainties and irreversible changes which this particular development, East Pye Solar, would cause. The weight on each side should reflect what is demonstrated, deliverable and secured. The planning balance should not attribute the full benefits of an integrated 500 MW solar-plus-storage project unless the Applicant demonstrates that the storage component is reasonably capable of being delivered in a timeframe in which those integrated benefits would arise. The solar element's Gate 2 position cannot be treated as	The Applicant refers to its response to WR-BEPS-018, WR-BEPS-193, and WR-BEPS-263.

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		establishing the deliverability of the Gate 1 BESS.	
WR-BEPS-261	Residual Effects Compulsory Acquisition	Chapter 20 also has an important consequence for compulsory acquisition. Section 122 of the Planning Act requires both that the land or rights are required for the development and that there is a compelling case in the public interest. That test becomes significantly harder to satisfy where parts of the authorised development remain optional or unresolved. NGET has not confirmed that the precise Site 1B National Grid solution sought through the DCO will ultimately be constructed or used; granting the DCO would not itself oblige NGET to use that solution. The final construction-access arrangements are also not fully resolved. Yet the Applicant seeks compulsory powers across the land necessary to preserve those implementation options. System 'optionality' or allowance for future attrition in the wider generation pipeline is not the same thing as demonstrating that	The Applicant refers to its response to WR-BEPS-004. With regard to the tests under s122 PA 2008, the **Statement of Reasons [APP-020]** sets out why the Applicant considers the tests have been met. A number of elements of detailed design cannot be confirmed until the tendering process has been completed; the Rochdale Envelope approach is used to address this, assessing maximum parameters where flexibility needs to be retained, with the **Draft DCO [REP1-014]** requiring that detailed design must be in accordance with the **Design Principles, Parameters and Commitments [REP1-078]**. This approach is standard for NSIP applications. On the National Grid Substation specifically, NESO contracted the Applicant to identify and provide the land and gain consent for the proposed new National Grid Substation as part of the connection offer received in October 2022. NGET has confirmed there is sufficient space in the proposed area for the new National Grid Substation, and ongoing discussions have resulted in amendments to the electrical design of Work Nos. 4A, 4B and 5. Under this DCO Application, all necessary land and rights will be established for NGET to undertake works to build the new National Grid Substation either by voluntary agreement or by exercise of compulsory acquisition or temporary use powers. In relation to

ID	Theme	Comments/Issues Raised	Applicant's Response
		particular private land must be compulsorily acquired now. Nor does compensation remove the need to establish necessity. Where the connection, access solution or design changes, land presently included for substations, cables, access, drainage, landscaping, construction compounds or rights may cease to be needed. The compulsory-acquisition case therefore needs to be tested plot by plot against a confirmed deliverable Scheme, including whether permanent freehold is actually necessary rather than lesser rights or temporary possession.	the points raised on the National Grid substation, the Applicant also refers to its response to WR-BEPS-012. In relation to the points raised in relation to the need for the Scheme, the Applicant refers to its response in WR-BEPS-003 above.
WR-BEPS-262	Residual Effects	Chapter 20 does not show that East Pye has limited residual environmental effects. It shows how extensive harm has been progressively filtered through separate methodologies until almost everything other than landscape harm appears in the final tables as Not Significant, while uncertain future benefits are simultaneously credited as Significant or Major Beneficial. The	The Applicant refers to its response to BEPS-479, BEPS-480, and BEPS-482-488 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
		Applicant's own evidence, together with the continuing positions of the Environment Agency, Historic England, Natural England, Norfolk Wildlife Trust, National Highways, Norfolk County Council, National Gas and aviation interests, demonstrates that the environmental case is not settled to anything approaching the degree of certainty implied by those tables. The fundamental defect is not simply that more mitigation is required. It is that the Scheme has not been shown to have exhausted avoidance. The Applicant has retained the approximate 500 MW scale, ten-Site geography and extensive cable and grid infrastructure and then sought to make the receiving environment accommodate them through planting, buffering, acoustic measures, drainage engineering, route management, habitat creation and future management plans. In several instances those measures themselves create further	

ID	Theme	Comments/Issues Raised	Applicant's Response
		landscape, ecological, heritage, soil or hydrological effects. The resulting complexity is evidence of an over-constrained site and design, not proof of environmental suitability.	
WR-BEPS-263	Residual Effects	Nor can the remaining harm properly be dismissed as temporary or reversible. Significant landscape change persists after fifteen years; BMV loss or downgrading is expressly acknowledged as irreversible; archaeological destruction cannot be reversed; mature ecological networks cannot be recreated on demand; vulnerable groundwater cannot safely be restored after contamination is allowed to occur; and part of the transmission infrastructure may remain indefinitely. East Pye would therefore leave a materially different landscape even after the generating equipment was removed. The final balance must consequently be based on what has actually been demonstrated. On the adverse side are extensive,	The Applicant refers to its response to WR-BEPS-247 and WR-BEPS-248. The Applicant considers that the ES provides a robust reasonable worst-case assessment of the Scheme. The planning balance considering the positive, neutral and negative impacts of the Scheme are set out in the **Planning Statement [REP1-074].** The **Planning Statement [REP1-074]** concludes that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case, having regard to the urgent need and critical national priority for the Scheme as set out in Government policy. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

ID	Theme	Comments/Issues Raised	Applicant's Response
		site-specific, long-term and in some cases irreversible effects. On the beneficial side, several claimed benefits remain conditional upon future ecological establishment, mitigation performance, local employment capture, BESS delivery, grid utilisation and assumptions about whole-life carbon performance. Those prospective benefits cannot properly be afforded greater certainty than the harms which already exist in the evidence.	
WR-BEPS-264	Residual Effects	Most importantly, the existence of strong national policy support for renewable generation does not determine the environmental acceptability of the particular scale, location and configuration of East Pye Solar. The relevant enquiry is whether the benefits properly attributable to this Scheme have been accurately characterised, demonstrated and secured, and whether those benefits justify the particular environmental effects of the development actually authorised by the DCO.	The Applicant notes that BEPS have provided an assessment of NESO's analysis of regional capacity. The Applicant refers to its response to WR-BEPS-003 and Appendix F above, in particular that the need for solar is established by NPS EN-1 paragraphs 3.2.8-3.2.9 and not NESO's capacity ranges (as NPS EN-1 paragraph 3.2.6 expressly confirms).

ID	Theme	Comments/Issues Raised	Applicant's Response
		That enquiry requires the ExA to distinguish between harms inherent in providing renewable generation and harms arising from the Applicant's chosen configuration. ISH1 established that four of six site-selection stages had already been undertaken around Norwich Main before the connection strategy moved to Great Moulton, that the exercise was not restarted from the new connection point, and that the dispersed geography of the Scheme itself contributes to the requirement for multiple substations and extensive interconnecting infrastructure. The question is therefore whether the environmental burden of that configuration was adequately avoided and compared through the alternatives process, rather than whether BEPS can prove that renewable generation is unnecessary.	
WR-BEPS-265	Residual Effects	Where significant adverse effects remain, where the mitigation hierarchy has not been shown to have exhausted reasonable	The Applicant refers to the responses previously provided to Q1.1.1 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** in relation

ID	Theme	Comments/Issues Raised	Applicant's Response
		avoidance, where material benefits remain contingent or incompletely quantified, and where parts of the authorised design remain dependent upon later information, those matters must be reflected in the weight attached to both sides of the planning balance. The ExA should therefore not treat Tables 20.1–20.4 as the environmental balance. They materially understate the consequences of the Scheme. The proper conclusion from the evidence as a whole is that East Pye has not been demonstrated to be an environmentally coherent, proportionate and deliverable project within the present DCO envelope. Unless the outstanding evidence results in substantial avoidance, reduction and redesign capable of removing these conflicts during Examination, development consent should not be recommended. Further layers of mitigation would not cure the central problem: the Scheme is requiring the landscape to be reshaped around the project, when	to the application of the mitigation hierarchy, and the response to WR-BEPS-026 regarding the planning balance.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the project should have been reshaped—or relocated—to respect the environmental capacity of the landscape.	
WR-BEPS-266	Need for the Scheme	The evidence provided by BEPS across the three volumes of its Written Representations leads to a substantially stronger conclusion than any single chapter considered alone. 1. The weight of the Scheme-specific benefits has not been established with the certainty claimed. National policy strongly supports additional renewable generation, but that does not mean that every benefit asserted for East Pye should automatically receive full weight. The T7 East Anglia pipeline already exceeds the Ofgem/NESO 3,300 MW modelling envelope; NESO's Gate 2 regional test used only operational capacity; the BESS does not share the solar project's Gate status; the final engineering-	The Applicant refers to its responses to WR-BEPS-003 and Appendix F above. The Applicant specifically notes that the need for solar is established by NPS EN-1 paragraphs 3.2.8-3.2.9; that the specific contributions of individual schemes need not be considered (paragraph 3.2.10); and that It is not the government's intention in presenting any of the figures or targets in NPS EN-1 (which include the Clean Power capacity ranges) to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs.

ID	Theme	Comments/Issues Raised	Applicant's Response
		backed transmission solution remains unresolved; and no disclosed Scheme-specific analysis establishes the claimed absence of material curtailment or the asserted consumer-system benefit. Those matters affect the weight properly attributable to East Pye's particular benefits in the planning balance.	
WR-BEPS-267	Site Selection and Alternatives	2. The alternatives evidence does not yet demonstrate that the present configuration emerged from a sufficiently robust environmental comparison of the reasonable alternatives studied. ISH1 established that four of six site-selection stages were undertaken around Norwich Main and were not repeated when the connection strategy moved to Great Moulton. Continued inclusion of the land within a 20 km radius does not	The Applicant refers to its response to WR-BEPS-041 to 043.

ID	Theme	Comments/Issues Raised	Applicant's Response
		itself demonstrate that the same land would have been selected had Great Moulton been the starting point. This matters because the Applicant has also confirmed that the Scheme's geographical spread itself contributes to the requirement for additional substations and electrical infrastructure. ExQ1 now expressly requires the Applicant to explain why a fresh Great Moulton-centred exercise would not have produced a materially different Scheme, extent or configuration.	
WR-BEPS-268		3. The development for which consent and compulsory powers are sought is not yet sufficiently settled in several material respects. The BESS is severable and differently connected; NGET has not confirmed Site 1B as the final connection solution; the application permits	The Applicant refers to its response to WR-BEPS-021 and WR-BEPS-035 regarding the Rochdale Envelope approach; WR-BEPS-246 and WR-BEPS-247 regarding replacement and decommissioning; and WR-BEPS-249 on AILs.

ID	Theme	Comments/Issues Raised	Applicant's Response
		extensive design-envelope flexibility; major AIL and local access routes remain unresolved; and the Scheme expressly includes repeated replacement and infrastructure capable of surviving solar decommissioning.	
WR-BEPS-269		4. The receiving environment is substantially more constrained than a conventional agricultural solar site. The Applicant itself establishes a nationally important bat assemblage; the Scheme affects overlapping barbastelle maternity-colony landscapes with core sustenance zones covering the entire order limits, six adjoining ancient woods, BMV soils, sensitive aquifers and private water supplies, chalk-stream systems, high-grade heritage assets, tranquil rural landscapes and constrained historic roads.	**ES Volume 1, Chapter 3 - The Order Limits [APP-039]** provides a clear and accurate description of the Order Limits, including site naming, site locations and areas, and key environmental and planning constraints within and surrounding the Order Limits. As set out within Chapter 3, detail on the baseline conditions and sensitive receptors relevant to each technical assessment are detailed within the ES topic chapters. The impacts on receptors identified in BEPS' representation are assessed within the ES, and suitable mitigation and control measures identified.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-270	Water Environment Electromagnetic Fields Aviation	5. Several matters central to environmental acceptability remain unresolved rather than merely awaiting detailed implementation. The ecology baseline lacks a complete botanical and functional species picture; HFCL finds a significant lack of confidence in the water assessment; intrusive ground investigation and foundation-risk work are deferred; the final highway access architecture is not agreed; final noise plant and mitigation are not fixed; GAAC and Norfolk Gliding Club state the infrastructure risks a threat to human life; and the EMF assessment is not project-specific. These are not simply matters of selecting the colour of equipment or the precise position of a drain. They may determine whether elements of the Scheme can be constructed at all, or	The Applicant directs the respondent to the responses to WR-BEPS-028 and WR-BEPS-244 in relation to the water environment assessment, ground investigations and assessments (including Foundation Works Risk Assessment) to inform piling design, drainage and surface water drainage design. The Applicant refers to its response to WR-BEPS-176 for further information with specific reference to Tibenham Airfield.

ID	Theme	Comments/Issues Raised	Applicant's Response
		whether they require relocation or removal.	
WR-BEPS-271	Landscape and Visual Transport and Access Ecology and Biodiversity	6. Substantial harm is already established even on the Applicant's own case. Significant landscape effects persist after 15 years of mitigation. Independent heritage evidence identifies harm to 41 designated assets. The Scheme contains 829.1 ha of surveyed BMV land. Major night-time HDD noise is predicted at identified receptors before duration is used to reduce EIA significance. NCC says the current Sites 7–10 transport strategy cannot be supported, while National Highways maintains its objection. Norfolk Wildlife Trust identifies the scheme as an ecological 'risk' in this 'nature-dense' landscape.	In relation to landscape effects, the Applicant does not dispute that some significant residual effects remain for some receptors. However, this is the basis on which the LVIA has been transparently assessed. The Scheme has evolved through the application of the mitigation hierarchy, incorporating setbacks, buffers, reductions in panel areas, extensive hedgerow reinforcement, woodland planting and other green infrastructure measures designed to minimise effects on landscape character and visual amenity. 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 aid 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]**. In relation to transport, the Applicant notes that the comments regarding the Sites 7–10 transport strategy and National Highways' position are being addressed through the Examination process. The Applicant does not agree that the transport assessment demonstrates substantial transport harm. The effects of construction and operational traffic were assessed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**

ID	Theme	Comments/Issues Raised	Applicant's Response
			using recognised assessment methodologies and the significance of effects determined accordingly. The Applicant also notes that Norfolk County Council's comments relate to specific aspects of the proposed construction traffic strategy and do not alter the conclusions of the transport assessment regarding the significance of transport effects.
WR-BEPS-272	Management Plans	7. The mitigation case does not demonstrate that all of those constraints can be resolved simultaneously. Landscape screening alters openness and heritage setting. Internal haul routes may create ecological, drainage and land impacts. Foundation changes affect noise, ground conditions and groundwater. Habitat creation cannot demonstrate maintenance of protected-species function. Future management plans cannot compensate for a baseline that has not established what must be protected.	The Applicant refers to its response to WR-BEPS-230 and WR-BEPS-249.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-273	Compulsory Acquisition	8. The Applicant seeks compulsory powers of unusual breadth before those matters are resolved. Section 122 requires a compelling public-interest case for the particular land interest acquired. That case is materially weakened where the development is severable, the Grid solution is unconfirmed, land may become unnecessary, and permanent freehold acquisition is sought where the Applicant's own commercial arrangements contemplate leases.	The Applicant acknowledges the point raised and refers the respondent to the Applicants response in WR-BEPS-261, where the same concerns were raised.
WR-BEPS-274	Need for the Scheme	As a whole, BEPS's Written Representation demonstrates two propositions which are decisive to the planning balance: First, East Pye Solar is not a finished or sufficiently resolved project. Material questions remain over the final National Grid connection solution, the relationship between the solar and Gate 1 BESS elements, the construction envelope, highway	The Applicant does not agree that the matters identified are unresolved questions of principle or deliverability. The Scheme has been assessed on the basis of a reasonable worst-case scenario and incorporates appropriate flexibility secured through the **Draft DCO [REP1-014]**, **Design Principles, Parameters and Commitments document [REP1-078]**, and associated management plans **[REP1-058 to REP1-071]**. Ongoing discussions regarding detailed design, mitigation, control measures and consenting requirements are a normal part of the Examination process and do not indicate that the Proposed Development is

ID	Theme	Comments/Issues Raised	Applicant's Response
		access and abnormal-load routes, the ecological baseline, private water supplies, the hydrogeological model, foundations and HDD, operational noise, EMF, BESS safety, decommissioning and long-term restoration. Several of those matters may determine whether parts of the Scheme can be constructed at all, whether infrastructure must be relocated or reduced, and whether the environmental effects remain within the assessed envelope. They are therefore questions of principle and deliverability, not merely post-consent detail.	incapable of being delivered or that its likely significant environmental effects have not been assessed.
WR-BEPS-275	Transport and access	The transport case illustrates the wider problem particularly clearly. Norfolk County Council states that the submitted strategy for Sites 7–10 'cannot be supported' and requires a materially different internal-haul-route architecture, while National Highways maintains outstanding objections.	The Applicant notes this comment. The Applicant continues to engage with both Norfolk County Council and National Highways on these matters throughout the Examination process and is working with both parties to resolve outstanding matters where agreement has not yet been reached. A **Statement of Common Ground with Norfolk County Council [REP1-085]** and a **Statement of Common Ground with National Highways [REP1-093]** were submitted at Deadline 1

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-276	Water Environment	The water case is equally serious: independent review identifies 15 substantive deficiencies and a 'significant lack of confidence' that effects on the water environment are properly understood or capable of mitigation.	The Applicant notes this comment and will respond to the H Fraser Consulting report separately at Deadline 3.
WR-BEPS-277	Ecology and Biodiversity	The ecological baseline remains incomplete despite the Applicant's own evidence establishing a nationally important bat assemblage and multiple barbastelle maternity-colony networks.	The Applicant refers to its response to Norfolk County Council under NCC-035 within **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [PDA-008].**
WR-BEPS-278	Landscape and Visual Cultural Heritage Soils and Agricultural Land Noise and Vibration Other Environmental Matters Water Environment	Secondly, the harms are not hypothetical. The Applicant itself identifies extensive Significant landscape and visual effects, including Major effects persisting to Year 15. Independent heritage evidence identifies harm to 41 designated assets where the Applicant identifies harm to two. Approximately 829.1 hectares of surveyed land is BMV agricultural land, much of it slowly permeable and seasonally wet heavy clay whose full restoration after repeated disturbance over 60	The Applicant considers that **ES Volume 1, Chapter 20 - Summary of Significant Residual Effects [APP-056]** provides an accurate summary of the Scheme's residual significant effects. In relation to residual landscape effects the Applicant has provided a response in WR-BEPS-271. **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** concludes one major adverse effect at Year 15. In relation to effects to designated heritage assets detail is provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046].** The Applicant notes the HIA sand refers to the response provided in Table 1.2. In relation to BMV, as set out in **ES Chapter 15 [APP-051]** the loss of BMV land is limited to 28.9ha or including the

ID	Theme	Comments/Issues Raised	Applicant's Response
	Ground Conditions	years has not been demonstrated. Night-time HDD is predicted to place 15 receptors above SOAEL. The Scheme also concentrates major electrical infrastructure beside sensitive groundwater, private water supplies, strategic gas and rail infrastructure, aviation receptors, protected ecology and nearby communities. Those harms cannot be dismissed merely by invoking generic national renewable-energy need. BEPS accepts that the NPS framework establishes an urgent national need for low-carbon infrastructure and that the August 2026 NPPF gives substantial weight to relevant energy-security and net-zero benefits. The remaining question is the weight properly attributable to the benefits of this Scheme and whether its particular harms, uncertainties and configuration are acceptable when the relevant NPS and other policy requirements are applied.	mitigation planting 37.9ha. Land not subject to permanent works will be returned to agricultural use upon decommissioning. Micro-siting has been applied to the fixed equipment and woodland planting to minimise the use of BMV land. The Applicant does not agree that the extent of surveyed BMV land within the Order Limits should be conflated with permanent loss. The assessment distinguishes between land within the Order Limits, land temporarily affected during the operational life of the Scheme and land subject to permanent infrastructure, with the majority of agricultural land capable of continuing to fulfil agricultural functions following decommissioning. The Applicant does not agree that the extent of surveyed BMV land within the Order Limits should be conflated with permanent loss. The assessment distinguishes between land within the Order Limits, land temporarily affected during the operational life of the Scheme and land subject to permanent infrastructure, with the majority of agricultural land capable of continuing to fulfil agricultural functions following decommissioning. For matters relating to potential impacts on water receptors, the Applicant refers to its response to BEPS-281 in **The Applicant's Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. In relation to night-time HDD works, the Applicant acknowledges that the reasonable worst-case

ID	Theme	Comments/Issues Raised	Applicant's Response
			assessment predicts noise above the SOAEL at 15 receptors. However, this does not result in a significant effect in EIA terms because HDD at each crossing location would be short-lived, and the predicted exposure would not exceed the temporal criteria used to determine construction-noise significance. In summary, the Applicant notes that a number of the effects identified by BEPS have been assessed, reported and weighed as part of the EIA process and are not matters of uncertainty. Where significant effects remain, these are transparently reported within the Environmental Statement and form part of the overall planning balance. The Applicant also notes that a number of statutory consultees have either agreed or are progressing agreement on substantial elements of the environmental assessment and mitigation approach through Statements of Common Ground, including in relation to ecology, biodiversity, landscape, heritage and water environment matters. The Applicant therefore does not agree that the identified effects, either individually or collectively, outweigh the substantial benefits of the Proposed Development. The question for the Secretary of State is whether the residual effects identified through the assessment are acceptable when weighed against the Scheme's contribution to renewable energy generation, energy security and decarbonisation objectives in accordance with the relevant NPSs.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS-279	Need for the Scheme	Gate 2 status is relevant evidence of the solar project's connection position but does not itself answer the environmental alternatives, design or planning-balance questions. The BESS remains in the materially different Gate 1 position; the final NGET solution remains unresolved; and the Applicant's whole-life carbon calculation remains disputed. Those matters affect the certainty and weight of particular project benefits rather than the existence of generic national renewable-energy need. The planning balance must instead assess what East Pye would actually deliver, which elements are reasonably capable of implementation, what environmental effects arise from the development authorised by the DCO, whether those effects have first been avoided where reasonably possible and what residual harms remain after mitigation that is both effective and secured. The T7 pipeline, the different Gate status of the BESS,	The Applicant refers to its response to WR-BEPS-007 above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the unresolved NGET solution and the disputed whole-life carbon calculation are relevant because they affect the certainty and weight of particular claimed Scheme benefits, not because BEPS is required to prove that renewable generation is unnecessary.	
WR-BEPS-280	Management Plans	The mitigation case does not cure the problem. Much of the Scheme's environmental acceptability depends upon later surveys, later engineering, later management plans and future detailed design Screening, buffers, acoustic barriers, habitat creation, drainage measures and later risk assessments may reduce effects, but they also demonstrate that the chosen landscape is being required to accommodate a development whose conflicts should first have been avoided through site selection, scale and design.	The proposed management and mitigation measures relied upon in the ES are secured through various outline management plans which are secured via the Requirements contained within Schedule 2 to the **Draft DCO [REP1-014].** The approved detailed management plans must be substantially in accordance with the outline management plans. The final plans will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the **Draft DCO [REP1-014].** Paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur).

ID	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant refers to the responses previously provided to Q1.1.1 in **The Applicant's Responses to the Examining Authority's First Written Questions [REP1-083]** in relation to the application of the mitigation hierarchy
WR-BEPS-281	Soils and Agricultural Land	The whole-life case further weakens the description of East Pye Solar as temporary. The Scheme allows major replacement cycles during its 60-year life, significant grid infrastructure may remain permanently, restoration of BMV soils is not assured and the newly disclosed private landowner decommissioning securities do not yet demonstrate a coordinated, publicly enforceable and insolvency-resilient whole-Scheme restoration mechanism.	Restoration of BMV soils is secured through the **Outline SRMP [APP-204]** and in turn the detailed SRMP which is secured through requirement 18 of the **Draft DCO [REP1-014]**. As set out in **ES Chapter 15 [APP-051]** the loss of BMV land is limited to 28.9ha or 37.9ha including the mitigation planting. Land not subject to permanent works will be returned to agricultural use upon decommissioning.
WR-BEPS-282	Site Selection and Alternatives Examination Process	The position has also changed procedurally since the WR was drafted. ISH1 and ExQ1 show that the ExA is independently testing several of the structural issues raised by BEPS: whether environmental considerations genuinely drove site selection; whether the move from Norwich Main to Great Moulton should have produced a different Scheme; how land availability	The Applicant does not agree with this characterisation of the Examination. The matters identified are not unique to BEPS and are properly the subject of examination and testing by the Examining Authority. The Applicant has responded, and continues to respond, to the Examining Authority's questions through written submissions, hearing evidence, Statements of Common Ground and updates to the application documentation. The existence of examination questions does not indicate that the Scheme is fundamentally unresolved or that the planning balance cannot be undertaken. Rather, it reflects the purpose of the Examination process, which is to

ID	Theme	Comments/Issues Raised	Applicant's Response
		influenced the result; whether the design envelope is sufficiently precise; whether important mitigation is too qualified or deferred; whether PRoW and residential effects have been assessed across the appropriate spatial range; and whether sufficient baseline evidence exists in areas including soils, drainage and ground conditions. The outstanding issues are therefore not confined to objections advanced by BEPS; they are now active examination questions which require evidential answers before the planning balance can safely be completed.	test the evidence before the Secretary of State reaches a decision. The Applicant does not agree that the matters identified constitute unresolved questions of principle. The Scheme has been assessed on a reasonable worst-case basis using secured parameters and controls, and the Examining Authority's questions concern the testing and refinement of evidence and assessment rather than the identification of a fundamentally different project. The Applicant considers that sufficient information has been provided, and continues to be provided through the Examination process, to enable the planning balance to be undertaken in accordance with the relevant NPSs.
WR-BEPS-283	Cumulative and In-Combination Effects	The cumulative conclusion is stark: too much is already known about the harm, and too little is yet known about the solution.	The Applicant refers to its response to WR-BEPS-284 below.
WR-BEPS-284	Need for the Scheme	The Application asks the Secretary of State to accept significant and enduring environmental harm now while allowing essential questions of design, deliverability and mitigation to be resolved later. That reverses the proper planning sequence. Development consent	The Applicant does not agree with this conclusion. The Application is supported by a comprehensive Environmental Statement which identifies, assesses and reports likely significant environmental effects in accordance with the EIA Regulations. The Applicant does not agree that the Scheme would result in the extensive and enduring environmental harm suggested.

ID	Theme	Comments/Issues Raised	Applicant's Response
		should follow demonstration that an environmentally acceptable and deliverable project exists; it should not be granted in the expectation that such a project will be designed after consent.	The Environmental Statement identifies, assesses and transparently reports likely significant environmental effects where they occur. The Applicant's position is that those effects have been appropriately assessed on a reasonable worst-case basis and should be considered as part of the overall planning balance.
		The planning balance therefore weighs decisively against East Pye Solar. The harms are extensive, cumulative, long-term and in important respects irreversible. Several are Significant on the Applicant's own evidence. The project-specific and locational benefits relied upon to outweigh them are materially less certain than the Application suggests.	The Applicant further does not agree that development consent is being sought in advance of demonstrating an environmentally acceptable and deliverable project. The Scheme has been assessed on a reasonable worst-case basis using defined design parameters, and the flexibility sought through the DCO is subject to clearly established limits, Requirements and secured management plans. Detailed design progression following consent is an inherent and well-established feature of the NSIP process and does not indicate that a fundamentally different or unassessed scheme would be delivered.
		BEPS accordingly submits that the Application is unfinished, premature and fundamentally disproportionate to the environmental capacity of the landscape selected for it. The Examining Authority should recommend refusal, and the Secretary of State should refuse to make the Development Consent Order.	The Applicant's **Planning Statement [REP1-074]** and examination submissions set out why the Proposed Development accords with the relevant National Policy Statements and why the residual effects identified through the assessment are outweighed by the substantial benefits of the Scheme, including its contribution to renewable electricity generation, energy security and decarbonisation objectives. The planning balance must be undertaken on the basis of the assessed Scheme and its identified residual effects, rather than on the basis of hypothetical alternatives or unsubstantiated assumptions regarding future design evolution.

2.2 The Applicant's Response to BEPS' Comments on Design, The Works Plan and the Draft Development Consent Order

Table 2.2 Applicant's response to BEPS' comments on Design, the Works Plan and Draft DCO [REP1-192]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS1-001	Opening remarks	Purpose: to identify whether the design outcomes relied upon by the Applicant are translated into enforceable spatial and legal controls, and to identify design flexibility requiring clarification or amendment during the Examination.	The Applicant notes this comment and refers to the Applicant's response to Agenda Item 5 and Action Point 17 in **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Response to Action Points [REP1-098]**.
WR-BEPS1-002	Design Principles, Parameters and Commitments	The Applicant presents the Design Principles, Parameters and Commitments document as the instrument which secures the assessed design envelope for the Scheme as a whole. That is not what Requirement 5 presently says. Requirement 5 applies only to Works 1, 2 and 3. The parameters and commitments for the National Grid Substation, overhead-line works, cable corridors, general works, compounds, access works, habitat-management areas and permissive paths in Tables 4.4–4.11 therefore require a separate demonstration of how they are legally secured.	Revision C of the **Draft DCO [REP1-014]** was updated to address Works 1-6. The existing reference under 5(1) to "Works 1, 2 or 3" was updated to "Works 1, 2, 3 or 4". A separate sub-article 5(4) was added to ensure that Works 5 and 6 are bound by the design principles, parameters and commitments document. Requirement 5(2) requires that the submitted details for approval [for Works 1, 2, 3 or 4 *"must accord with the design principles, parameters and commitments"*, as must Works 5 and 6 through requirement 5(4). Works 1, 2, 3 or 4 cannot commence until the necessary details have been discharged. The flow from the DPPC through to the Requirement for Works is therefore to reflect all provisions within it.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The fact that the DPPC is a certified document does not, by itself, impose a requirement to comply with every provision in it.	Breach of the Requirements of a DCO is a criminal offence. For Works 5 or 6 not to comply with relevant provisions of the DPPC would also be a criminal offence.
WR-BEPS1-003	Design Principles, Parameters and Commitments	BEPS has cross-referenced the Applicant's Design Approach Document ('DAD'), Design Principles, Parameters and Commitments ('DPPC'), Works Plan Revision B and the current tracked Draft Development Consent Order ('dDCO'). The issue is not whether the design documents contain appropriate aspirations, but whether the development that could lawfully be built under the Works Plan and dDCO is constrained to the design outcomes and environmental assumptions relied upon in the Environmental Statement.	The Applicant notes this comment and refers to its response under SCH-005 and SCH-006 in **The Applicants Response to Relevant Representations Part 5 - By Theme [PDA-012]**.
WR-BEPS1-004	Design Principles, Parameters and Commitments	The Applicant's own design narrative states that good design will be secured through the Works Plan, the DPPC, outline management plans and the dDCO Requirements. DAD §6.1.4 says Requirement 5 requires 'the development' to be carried out in accordance with the DPPC, while DPPC §2.1.3 says the parameters and commitments in Tables 4.1 to 4.11 'would be secured by	The Applicant notes this comment and refers to the responses at WR-BEPS1-001 to WR-BEPS1-003. The Applicant also refers to its response Historic England under WR-HE-094 in **The Applicant's Response to Submissions Received at Deadline 1 - Statutory Bodies [EN0110014/ EXAM/9.29]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Requirement 5'. The operative text of Requirement 5 is narrower: it applies only to Work Nos. 1, 2 and 3. This matters because Tables 4.4 to 4.11 contain material parameters and commitments for the National Grid Substation, overhead-line works, cable corridors, access and highway works, construction and decommissioning compounds, habitat management areas and permissive paths. Some individual matters are controlled elsewhere in the dDCO, but those separate controls do not obviously reproduce every DPPC parameter and commitment for Works 4 to 11. The Examination therefore needs a precise securing matrix rather than an assumption that certification of the DPPC alone makes every row binding.	
WR-BEPS1-005	Design Principles, Parameters and Commitments	The concern is amplified by the breadth of Schedule 1. Work No. 6 authorises not only cables but roads, drainage, drilling, tunnelling, PRoW diversions and temporary construction and decommissioning laydown areas. Work No. 7 combines biodiversity mitigation with fencing, lighting, tracks, drainage, laydown areas and O&M buildings. Work No. 10 is described as habitat management but also authorises access	The Applicant refers to its response WR-BEPS1-004 in this document.

ID	Theme	Comments/Issues Raised	Applicant's Response
		and drainage. Schedule 1 then adds a broad associated-development power after Work No. 11, including site clearance, earthworks, drainage, lighting, access and tunnelling, provided those works remain within the scope of the ES.	
WR-BEPS1-006	Design Principles, Parameters and Commitments Draft DCO	BEPS therefore asks the ExA to require a complete design-security matrix, to amend Requirement 5 or provide equivalent controls for Works 4 to 11 where necessary, to resolve overlap between ecological land and construction or maintenance uses, and to tighten the repeated use of 'substantially in accordance with', 'where practicable' and 'as far as practicable' where the ES relies upon a commitment to avoid or mitigate an effect.	The Applicant notes this comment and refers to the response at WR-BEPS1-001 and WR-BEPS1-004 in Table 2.2 of this document.
WR-BEPS1-007	Design Principles, Parameters and Commitments Draft DCO	Document reviewed and method This submission is based upon APP/7.17 Design Approach Document Revision 1 (March 2026), APP/7.18 Design Principles, Parameters and Commitments Revision 1 (March 2026), APP/2.3 Works Plan Revision B (April 2026, Parts 1 and 2), and the tracked Draft Development Consent Order Revision 2 supplied for the Examination. References below are to sections, tables, Work numbers and	The Applicant notes this comment and refers to its responses in this table.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Requirements so that the analysis remains usable if PDF pagination changes. The audit identifies each design claim or parameter in the DAD and DPPC, checks the relevant Works Plan envelope and then identifies the dDCO provision that makes the parameter or commitment enforceable. Where another Requirement provides a partial control, that is acknowledged rather than treating Requirement 5 as the only mechanism.	
WR-BEPS1-008	Design Principles, Parameters and Commitments Draft DCO	Requirement 5 and Works 4-11 DAD §§6.1.2–6.1.4 describes the Works Plan as securing the maximum spatial parameters and states that Requirement 5 requires the development to accord with the DPPC. DPPC §§2.1.1–2.1.4 and 3.1.4–3.1.5 describes the DPPC as a control document forming the basis of the EIA and says Tables 4.1– 4.11 would be secured by Requirement 5. Requirement 5 prevents commencement only of Work Nos. 1, 2 or 3 until details of layout, scale, finished levels, appearance, surfacing and access have been approved; those details must accord with the DPPC. Work Nos. 4 to 11 are not included in that detailed-design approval	The Applicant notes this comment and refers to the response at WR-BEPS1-002 and WR-BEPS1-004.

ID	Theme	Comments/Issues Raised	Applicant's Response
		mechanism. This does not mean they are wholly uncontrolled, because other Requirements regulate fencing, drainage, archaeology, management plans and other matters. The question is whether those separate controls secure every parameter and commitment on which the ES and design case rely. The point is material because DPPC Table 4.4 gives a maximum 6 ha National Grid Substation, maximum busbar height of 15m, potentially 12 m-deep foundations, fencing, access, drainage and environmental offsets. Table 4.5 permits up to four new pylons, maximum height 61 m, a working width of up to 150 m and substantial access and compound requirements. Tables 4.6–4.11 control cable working widths, drilling pits, construction compounds, access, habitat management and permissive paths. The ExA should be able to identify the precise legal provision making each such parameter binding.	
WR-BEPS1-009	Works Plan Indicative Masterplan	Works Plan flexibility and the Indicative Masterplan The DAD uses the Indicative Masterplan to demonstrate design evolution and quality, but it is not the consented layout.	The Scheme is authorised through the **Draft DCO [REP1-014]**, with the extent of the authorised development defined by the **Works Plans [REP1-005 and REP1-006]** and controlled through the **Design Principles, Parameters and Commitments [REP1-078]**. The Scheme has been assessed on the

ID	Theme	Comments/Issues Raised	Applicant's Response
		Article 3 requires numbered works to be situated within the corresponding numbered areas on the Works Plan. The Works Plan therefore defines broad envelopes, often with several Work layers over the same land. The correct test is whether any detailed layout lawfully available inside those envelopes remains within the reasonable worst case assessed by the ES. BEPS asks that every design benefit shown only illustratively be accompanied by a simple schedule stating whether it is legally secured, by what provision and with what permissible tolerance.	basis of the parameters and controls set out in those documents, together with the description of the Scheme contained in **ES Volume 1, Chapter 4 - The Scheme [REP1-022]**. Any detailed design must therefore remain within the limits established by those documents. The Scheme has been assessed using a Rochdale Envelope approach, with the Environmental Statement assessing the realistic reasonable worst-case scenario where flexibility is retained. The relevant question is therefore not whether a particular illustrative feature shown on the Indicative Masterplan is ultimately delivered in the precise form shown, but whether any detailed design taken forward within the relevant Works Plan envelopes and secured parameters remains within the scope of the environmental assessment. The Applicant has demonstrated that the flexibility retained through the DCO and secured documents would not give rise to effects beyond those assessed in the ES. Flexibility is required to allow detailed design development, procurement choices and optimisation of technology, while remaining within the assessed and secured environmental envelope.
WR-BEPS1-010	Works Plan Draft DCO Ecology and Biodiversity	Work No. 7 and overlapping ecological / construction functions Work No. 7 authorises fencing and gates, CCTV and lighting, biodiversity mitigation and enhancement, existing and new	**ES Volume 2, Figure 4.1 - Indicative Masterplan [REP1-025]** illustrates how the various components of the Scheme, including landscape and ecological measures, can be accommodated within the authorised development. It should be read alongside

ID	Theme	Comments/Issues Raised	Applicant's Response
		tracks, ramps, bridges, PRoW diversions, earthworks and bunds, drainage, acoustic barriers, utilities, secondary temporary construction and decommissioning laydown areas and operational and maintenance buildings. The same numbered work can therefore describe both habitat and activities capable of disturbing or physically occupying that habitat. Fixed ecological exclusion areas should be identified rather than relying on the generic Work No. 7 layer. This is directly relevant to Site 6, which has been presented as mitigation/BNG land while also requiring construction functions, and Site 7, where access interacts with ecological/open nesting-bird land. If a parcel can later be used for a haul route, secondary compound, replacement work or decommissioning, the ecological assessment and BNG metric should reflect that temporal disturbance and reinstatement.	the **Works Plans [REP1-005 and REP1-006]**, **ES Volume 1, Chapter 4 - The Scheme [REP1-022]** and the **Design Principles, Parameters and Commitments [REP1-078],** which together define the parameters within which the detailed design must be developed. The landscape and biodiversity mitigation measures, including flower-rich pollinator mix, native hedgerow with trees and native linear tree belts are detailed within Work No. 7 and shown on the **Green Infrastructure Strategy [REP1-013]** and within Appendix B of the **Outline LEMP [REP1-064]**. The siting of new tracks, ramps, bridges, PRoW diversions, earthworks and bunds, drainage, acoustic barriers, utilities, secondary temporary construction laydown areas and operational and maintenance buildings at the detailed design stage will need to be undertaken in a manner that respects and accommodates the landscape measures committed to in the **Green Infrastructure Strategy [REP1-013]**, together with the minimum offset distances set out in the **Design Principles, Parameters and Commitments [REP1-078]** (including 10m from hedgerows, 15m from individual trees, groups of trees and non-Ancient Woodland, and 15m from PRoW). The ecological enhancement will be managed for a minimum of 30-years as detailed in the **Biodiversity**

ID	Theme	Comments/Issues Raised	Applicant's Response
			Net Gain Report [APP-218] and supported by the **Biodiversity Net Gain Statutory Metric [APP-219]**, but there will be a management scheme running throughout the 60-year operational lifespan of the development. Effort will be made to reduce any unnecessary impacts to these proposed and subsequently established habitats focusing on Lower distinctiveness habitats e.g. modified grassland and retained arable farmland whereby temporary impacts of decommissioning will allow the habitats to return to their condition at a later date. This is detailed in the **Outline DEMP [REP1-062]**. **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [REP1-050]** includes the provision of method statements designed to avoid impacts upon habitats and associated species.
WR-BEPS1-011	Works Plan Draft DCO Cable Route Corridor	Work No. 6 cable corridor Work No. 6 is not simply an underground trench. It includes access tracks, roads, drainage, joint bays, drilling, tunnelling, PRoW diversions and temporary construction and decommissioning laydown areas with hardstanding, parking, materials storage, offices, lighting, drainage and utilities. DPPC Table 4.6 gives a nominal 25 m working width but says it 'will be widened in places' for	The parameters relating to Works no. 6 are set out in the **Design Principles, Parameters and Commitments [REP1-078]** ('DPPC'). The DPPC, as set out in paragraph 4.2.24 of **ES Volume 1, Chapter 4 - The Scheme [REP1-022]** informs the Environmental Impact Assessment. As noted at WR-BEPS1-005 in Table 2.1, Revision C of the **Draft DCO [REP1-014]** was updated to address Works 1-6. The existing reference under 5(1) to "Works 1, 2 or 3" was updated to "Works 1, 2, 3 or 4".

ID	Theme	Comments/Issues Raised	Applicant's Response
		crossings and operations without stating a universal numerical maximum. The ES and Works Plan should therefore be tested against the maximum realistic working envelope at watercourses, roads, utilities, hedgerows, PRoWs and other sensitive receptors. Where trenchless construction is relied upon environmentally, it should be secured or the realistic fallback method should be assessed.	A separate sub-article 5(4) was added to ensure that Works 5 and 6 are bound by the design principles, parameters and commitments document. In addition, **The Outline Cable Route Construction Statement [REP1-080]** sets out an overview of works within the Cable Route (RCR) Corridor are likely to be constructed; and identifies key infrastructure features and/or environmental receptors within the CRC that have been committed to as 'Avoidance Areas' (via **the Outline CEMP [REP1-058]**). Avoidance Areas are locations where trenchless technologies rather than open cut trenches will be used to avoid certain environmental receptors within the CRC. This statement commits to specific receptors within the CRC being an Avoidance Area, although the start and end points of the different construction methods for the CRC will be confirmed at the detailed design stage. A final Crossing Schedule of key infrastructure and environmental features will be provided for each stage of construction and secured via the detailed Construction Environmental Management Plan (CEMP) via Requirement 13 of the **Draft DCO [REP1-014]**.
WR-BEPS1-012	Works Plan Draft DCO	National Grid infrastructure and overhead-line works Work Nos. 4 and 5 illustrate why the Requirement 5 issue is not a minor	The Applicant has used a Rochdale Envelope approach to designing and proposing the Scheme for consent. The indicative design is consistent with the physical parameters specified in and controlled by

ID	Theme	Comments/Issues Raised	Applicant's Response
	Point of Connection	drafting point. DPPC Tables 4.4 and 4.5 contain the principal dimensions and commitments for the National Grid Substation and overhead-line works, yet those Works are outside Requirement 5. The ExA should require the Applicant to identify which parameters are directly binding and how any National Grid-driven change is tested against the ES, Works Plan and DPPC.	the DCO / secured documents. This approach provides the Applicant with flexibility to design a scheme at the detailed design stage, which maximises the benefits delivered by the Scheme through optimising the use of available technology in the later stages of procurement and prior to construction, without causing rise to any unassessed impact. Revision C of the **Draft DCO [REP1-014]** was updated to address Works 1-6 as explained in WR-BEPS1-002.
WR-BEPS1-013	Works Plan Draft DCO Ecology and Biodiversity	Ecology, BNG and lifecycle Requirement 9 secures only a minimum 10% habitat, hedgerow and watercourse BNG 'during the operation of the authorised development' and requires a future BNG strategy substantially in accordance with the Outline LEMP. The DAD also says the BNG calculations will be updated at detailed design. These provisions need to be reconciled with the Works Plan and decommissioning. Work No. 10 is described as habitat management but permits fencing, earthworks, ponds, trenching, swales, access and drainage. Requirement 21 includes Work No. 10 among associated development to be decommissioned no later than the related solar development. The Applicant should identify which	The Government guidance on BNG for NSIPs states that schemes submitted after 2 November 2026 must provide a minimum of 10% BNG. The application for the East Pye Solar scheme was submitted on 6 March 2026 and, as such, this minimum requirement does not apply. The Applicant has nevertheless opted to commit to BNG of greater than 10%. The Applicant's commitment is to BNG as secured through Requirement 9 of the **Draft DCO [REP1-014]**. The assessment of beneficial effects provided within **Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** considers the habitat provision / enhancement / retention measures provided within the Green Infrastructure Strategy when considering the benefits to biodiversity and green infrastructure connectivity. The **Biodiversity Net Gain Report [APP-218]** illustrates that in practice, based on the **Green Infrastructure Strategy [REP1-013]** (as

ID	Theme	Comments/Issues Raised	Applicant's Response
		habitat gains remain permanently, which cease with the Scheme, which may be returned to agriculture and whether any land credited as BNG is available for construction, replacement or decommissioning activity.	secured within **the Outline LEMP [REP1-064]**), the Scheme will deliver BNG in excess of 10% BNG. The Applicant updated the **Draft DCO [REP1-014]** at Deadline 1 so that Requirement 9 now commits to a net gain of: • +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. It is considered highly unlikely that the reversion of the Sites back to agricultural practices would result in an extensive loss of existing or created habitats of ecological importance. Such habitats are primarily associated with field margins and the existing farmland landscape, such as hedgerows, rivers, lowland deciduous woodland, ponds; there are no plans to remove such features. Following from 60 years of favourable management, these habitats would be in an ecologically favourable condition compared to the baseline.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS1-014	Design Principles, Parameters and Commitments	Qualified commitments The DPPC repeatedly uses 'where practicable', 'wherever practicable' and 'as far as practicable' for matters including cable routing, PRoW avoidance, access selection, flood-risk siting and soil handling. Such flexibility may be justified in engineering terms, but where the ES relies on the measure as embedded mitigation the ExA should require an objective test for impracticability, an identified approving body and an assessed fallback.	These **DPPC [REP1-078]** sets out the parameters and commitments in respect of which the Environmental Impact Assessment (EIA) for the Scheme has been undertaken. As such, the document does not set out the detailed design for Scheme, which would come after the grant of development consent. The qualifying phrases are considered appropriate by the Applicant at this stage given the need for flexibility to take into account further survey work, detailed design, construction methodologies, logistics and programming, technology advances and evolution in good practice. This need for flexibility is set out in paragraph 2.1.3 of the **DPPC [REP1-078]**, in addition to confirming that *"When the detailed design for the Scheme is submitted for approval to the relevant local planning authorities pursuant to the detailed design approval DCO Requirement, those details must accord with the relevant parameters and commitments set out in this document."* Paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the ES. This ensures that any mitigation measures identified in the ES will be secured by ensuring that the detailed design of the

ID	Theme	Comments/Issues Raised	Applicant's Response
			Scheme falls within the framework of the conclusions of that ES. It is the Applicant's opinion that the qualifying phrases of the **DPPC [REP1-078]** provide sufficient clarity of the design and measures relied upon within the Environmental Statement, nor does flexibility that they allow affect the likely residual effects of the Scheme as presented identified in the Environment Statement. The approach taken by the Applicant is consistent with other solar NSIPs including the recently consented Green Hill Solar Farm Order 2026.
WR-BEPS1-015	Design Principles, Parameters and Commitments Draft DCO	'Substantially in accordance with' and later amendment The dDCO repeatedly requires later plans to be 'substantially in accordance with' the outline BSMP, LEMP, protected species strategy, BNG strategy, archaeology strategy, CEMP, OEMP, CTMP, OTMP, PRoW plan, soil plan and DEMP. Requirement 10 applies the same formulation to permanent fencing details. This adds an undefined tolerance to the spatial and technological flexibility already present in the Works Plan. Requirement 3 also allows amendments to certified documents and requirement-approved plans where the relevant planning authority is satisfied that no	For the phrase 'substantially in accordance with' the Applicant refers to its response ID WR-BEPS1-023 in this document and to ID EA-004 in **The Applicants Response to Relevant Representation Part 2 - Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [PDA-009]**. The Applicant does not propose to make the amendment proposed by BEPS as the Applicant considers the measures in place provide sufficient protection. As BEPS note, Requirement 3(2) provides that the relevant planning authority must not approve any amendments to any approved document unless it has been demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to

ID	Theme	Comments/Issues Raised	Applicant's Response
		materially new or materially different environmental effects would arise. BEPS asks for express protection against amendments that reduce a minimum buffer, exclusion zone or other mitigation relied upon by the ES, HRA or other assessment.	give rise to any materially new or materially different environmental effects in comparison with those reported in the ES. Breach of a requirement is an offense. Paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the ES. This ensures that any mitigation measures identified in the ES will be secured.
WR-BEPS1-016	Design Principles, Parameters and Commitments Draft DCO	Permitted preliminary works The definition of 'commence' excludes permitted preliminary works, which include surveys, intrusive investigations, contamination remediation, diversion of apparatus, contractor facilities, temporary enclosure and site clearance including vegetation removal and demolition. Requirement 13 requires those works to comply with the preliminary works environmental management plan, but the wider pre-commencement Requirements do not necessarily bite before they occur. The ExA should therefore confirm that preliminary works cannot prejudice protected species, habitats, archaeology, soils, hydrology or later compliance with	The Applicant has prepared the **Permitted Preliminary Works Environmental Management Plan [EN0110014/EXAM/9.32]**, submitted at Deadline 2. The Plan includes controls that ensure that the works do not rely on plans to be approved as part of wider pre-commencement Requirements.

ID	Theme	Comments/Issues Raised	Applicant's Response
		the mitigation hierarchy, and that the preliminary works plan contains equivalent safeguards where necessary.	
WR-BEPS1-017	Design Principles, Parameters and Commitments Draft DCO	Replacement cycles and maintenance powers The dDCO definition of 'maintain' includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement) and improve. Article 5 permits maintenance at any time within the Order limits provided it does not give rise to materially new or materially different environmental effects. The design controls should therefore state whether major replacement campaigns must use the original approved access, compound and laydown areas; whether BNG and protected ecological areas are excluded; whether replacement compounds require approval; and how soil, drainage, traffic, noise and ecology effects are controlled.	The **Outline OEMP [REP1-060]** provides controls for the Scheme during the operational phase, including details on the replacement programme. For example, Section 2.12 confirms that *"Access to the Sites will be via the access routes defined for the construction phase. If any Abnormal Indivisible Loads (AILs) are required for replacement of equipment, consultation will be carried out and approvals will be sought from the relevant local planning and highway authorities"*. The **Outline OEMP [REP1-060]**, which includes details of replacement activities, must be approved by the relevant planning authority in accordance with Requirement 14 of the **Draft DCO [REP1-014]**. Construction and laydown areas can only take place in accordance with Schedule 1 of the **Draft DCO [REP1-014]** and the **Works Plans [REP1-005** and **REP1-006]**. The **Outline LEMP [REP1-064]** contains habitat management measures for the Scheme which will provide net gains for biodiversity. The Applicant also refers to its response at WR-BEPS1-024 of this document. The **Outline OEMP [REP1-060]** also provides other controls during operation, including soil, drainage, traffic, noise and ecology effects.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS1-018	Design Approach Document	The DAD presents setbacks at Sites 4B, 5 and 7 and increased mitigation at Site 3 as successful design evolution. The ExA should distinguish between screening or offset and genuine avoidance. Where the heritage or ecological case depends upon a setback, the setback should be a fixed minimum control rather than only an Indicative Masterplan feature.	The Applicant notes this comment but considers the information provided in the DCO application documentation, including the outline management plans, is clear.
WR-BEPS1-019	Design Principles, Parameters and Commitments	PRoW and fencing The DPPC states a 15 m offset between solar modules and PRoW and a 15 m buffer between permissive paths and Scheme infrastructure, excluding landscaping. Those numbers do not, by themselves, establish the practical character of the route because Work No. 7 also permits fencing, CCTV, lighting, tracks and other works, and Work No. 9 permits access. BEPS asks for route-specific cross-sections showing the path, fence, array, CCTV, access track, planting and drainage on both sides of affected PRoW, and for the DCO to make clear what the 15 m is measured to and what may occupy the intervening space.	**ES Volume 2, Figure 4.1 - Illustrative Technical Information [REP1-044]** provides an indicative arrangement within the 15m buffer.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPS1-020	Design Principles, Parameters and Commitments Draft DCO	Requested actions • Require a complete design-security matrix for every row of DPPC Tables 4.1–4.11, identifying Work number, Works Plan polygon, precise DCO article or Requirement, permissible tolerance and the ES reasonable-worst-case assessment. • Require the Applicant to explain the inconsistency between DAD §6.1.4 / DPPC §2.1.3 and Requirement 5, and amend Requirement 5 or provide equivalent controls for Works 4–11 where DPPC parameters are relied upon. • Require composite conflict plans for Sites 3, 6 and 7 and the Great Moulton infrastructure hub showing Works 1–11, mitigation/BNG, PRoWs, ecological buffers, watercourses, heritage-sensitive areas, compounds, access and cable works. • Create fixed exclusion areas preventing land counted as BNG or essential ecological mitigation from being used for construction, replacement, maintenance or	The Applicant notes this comment and refers to the responses set out under WR-BEPS-001 to WR-BEPS1-019 in this table.

ID	Theme	Comments/Issues Raised	Applicant's Response
		decommissioning unless that use is expressly assessed and included in the BNG metric. • Require a maximum assessed Work No. 6 working width at each sensitive crossing and secure any trenchless method relied upon to avoid significant effects. • Define or replace 'substantially in accordance with' where outline documents contain mitigation relied upon by the ES, and prevent reductions in fixed minimum mitigation without equivalent assessment. • Identify every 'where practicable' / 'as far as practicable' commitment relied upon as mitigation and provide objective exception criteria and a secured fallback. • Clarify the status of Work No. 10 at decommissioning and identify which BNG habitats remain after land is restored or returned to agriculture. • Confirm how panel, inverter, transformer and BESS replacement cycles are spatially controlled and	

ID	Theme	Comments/Issues Raised	Applicant's Response
		how they avoid mitigation/BNG land. • Confirm that permitted preliminary works cannot remove vegetation or undertake intrusive works without equivalent protected-species, archaeology, water, soil and contamination safeguards. • Provide route-specific PRoW cross-sections and fix any heritage/ecological setback relied upon by the design case.	

2.3 The Applicant's Response to BEPS' Proposed Drafting and Clarification Points of the Draft DCO

Table 2.3 Applicant's Response to BEPS' comments on Design, the Works Plan and Draft DCO Appendix B [REP1-192]

ID	Provision	Requested clarification / amendment	Applicant's Response
WR-BEPS1-021	Requirement 5	Extend detailed-design approval to all Works for which DPPC Tables 4.4–4.11 contain EIA parameters/commitments or provide equivalent work-specific requirements.	Requirement 5 does not include Work Nos. that either relate to subsoil activities that are not required to be subject to the same types of detailed design controls or are controlled by other Requirements. For example, fencing works are controlled by Requirement 10 of the **Draft DCO [REP1-014]**. Inclusion of additional Works Nos. within Requirement 5 is unnecessary and would be duplicating a process separately controlled by other Requirements of the **Draft DCO [REP1-014]**.
WR-BEPS1-022	Requirement 3	Prevent amendments from reducing minimum buffers, exclusion zones, maximum parameters or relied-upon mitigation without equivalent environmental assessment and consultation.	Amendments under Requirement 3 are controlled by sub-paragraph 3(2) which provides that "the relevant planning authority must not approve any amendments … unless it has been demonstrated … that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement." For this reason, further environmental assessments and consultation will not be required because amendments under Requirement 3 cannot give rise to materially new or different environmental effects.

ID	Provision	Requested clarification / amendment	Applicant's Response
WR-BEPS1-023	Requirements 6-18 and 21	Define the permissible degree of departure where 'substantially in accordance with' is retained.	The wording "substantially in accordance with" is a necessary and proportionate mechanism for inclusion within the **Draft DCO [REP1-014]** to provide essential flexibility between the outline stage and detailed design. This wording is precedented in numerous made DCOs. The extent of any departure from the outline management plans is controlled by paragraph 2(4) of Schedule 15 to the **Draft DCO [REP1-014]** which requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the ES. This ensures that any mitigation measures identified in the ES will be secured.
WR-BEPS1-024	Requirement 9	Clarify duration of 10% BNG, what survives decommissioning, and whether land credited as BNG may be used for compounds, access or replacement.	The Applicant notes this and refers to the response at WR-BEPS1-013 in Table 2.2. The Applicant does not anticipate a conflict between BNG measures implemented and accesses or areas where replacement is taking place. In any event, the Scheme will deliver in excess of 10% BNG for habitats and hedgerows for the duration of the operational period.
WR-BEPS1-025	Work Nos. 6-10	Provide sub-zones distinguishing cables, compounds, access, ecological mitigation and BNG rather than relying on broad overlapping work layers.	The Cable Route Corridor, compounds, access and habitat management areas are shown spatially on the **Works Plan [REP1-005 and 006]**. **ES Volume 1, Figure 4.1 - Indicative Masterplan [REP1-025]** and the **Green Infrastructure Strategy [REP1-013]** illustrate the works at this stage. Flexibility is

ID	Provision	Requested clarification / amendment	Applicant's Response
			required, and is built into the **Draft DCO [REP1-014]**, through the Requirements seeking approval of final development details and the various management plans, to adequately control these works.
WR-BEPS1-026	Work No. 10 / Requirement 21	Clarify whether habitat management areas are removed, cease to be managed, or remain after decommissioning.	The Applicant notes this and refers to the response at WR-BEPS1-013 in Table 2.2.
WR-BEPS1-027	Permitted preliminary works	Confirm equivalent protected-species, archaeology, water, soil and pollution controls before vegetation removal or intrusive works.	The Applicant notes this comment and refers to the Applicants response to Q1.9.4 in **The Applicant' s Response to the Examining Authority's First Written Questions [REP1-083]**.
WR-BEPS1-028	Replacement and maintenance	Require major replacement campaigns to use approved access/compounds and protect BNG/mitigation areas.	The Applicant refers to its response in WR-BEPS1-017.
WR-BEPS1-029	Heritage / ecological setbacks	State any setback relied upon by the ES/design case as a binding minimum rather than only an illustrative feature.	Setbacks (or design buffers) are set out in the **Design Principles, Parameters and Commitments [REP1-078]**. Requirement 5 of the **Draft DCO [REP1-014]** states that *'(2) The details submitted must accord with the design principles, parameters and commitments. (3) The authorised development must be carried out in accordance with the approved details. (4) Works Nos. 5 and 6 must be carried out in accordance with the design principles, parameters and commitments'.*

3 Applicant's Response to BEPS-Great Moulton Deadline 1 Submissions

3.1 The Applicant's Response to BEPS - Great Moulton's Written Summary of Representation – Battery Energy Storage System, Project Substation and Associated Site 1 Grid Infrastructure

Table 3.1 The Applicant's Response to BEPS-Great Moulton [REP1-329]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPSGM-001	Opening remarks	This representation concerns the proposed Battery Energy Storage System ("BESS"), Project Substation and associated Site 1/National Grid infrastructure between Great Moulton and The Tivetshalls. The central issue is not that East Pye has undertaken no assessment. It has submitted a substantial Environmental Statement, plans, technical appendices and outline management documents. The issue is whether those documents provide a sufficiently clear, site-specific and enforceable case for this concentration of BESS and grid infrastructure. The Examining Authority is respectfully requested to consider the development as	The Applicant refers to its response to BEPSG-001 **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		it would be experienced locally: as one western infrastructure cluster comprising the BESS, Project Substation, National Grid Substation, grid connection works, overhead-line and pylon works, access, drainage, security infrastructure and mitigation, rather than as isolated components.	
WR-BEPSG-002	Need for the Scheme	1. Need, Deliverability and Alternatives East Pye should demonstrate the specific need and deliverability case for the BESS as distinct from the solar generating station. BEPS submits that the BESS should not simply inherit the general national policy need for solar generation. East Pye should identify which planning benefits depend specifically upon the BESS and demonstrate that those benefits are sufficiently certain to be given weight. There is also no sufficiently transparent BESS-specific alternatives appraisal. Grid proximity and co-location may provide engineering advantages, but they do not themselves establish that this is the least harmful or most appropriate location. East Pye should provide a criteria-led comparison of reasonable locations and configurations, including a smaller BESS,	The Applicant notes this representation. The Applicant refers to its response to BEPSG-003 (in Table 2.2) and Great Moulton Action Group under GMAG-015 (in Table 2.10) in **The Applicants Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		alternative BESS location, solar-only option and, where reasonable, off-site or network storage.	
WR-BEPSG-003	EIA Methodology Scheme Description	2. Definition of the Development and Design Certainty The Applicant's documents are not consistently clear about the spatial relationship between the approximately 22.90 ha BESS Site, Work No. 2, Sub-Site 1B, the Project Substation and the National Grid Substation. East Pye should provide one definitive coordinated plan and schedule reconciling the Works Plans, Land Plans, Environmental Statement, Design Approach Document and draft DCO. Significant matters remain for detailed design, including final battery technology and chemistry, enclosure numbers and arrangement, cooling, fire suppression, final plant locations, acoustic mitigation, firewater design and aspects of the Project Substation configuration. A Rochdale Envelope can provide legitimate flexibility, but only where every material choice is bounded by an assessed worst case and enforceable DCO controls.	The Applicant refers to its response to BEPS-146 to BEPS-160 within **The Applicant Response to Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		East Pye should therefore identify the maximum development capable of being built, the assessment assumption controlling each deferred design choice, the approval mechanism, and how compliance will be verified. Later design should not be permitted to create materially different or greater effects than those examined.	
WR-BEPSG-004	Battery Safety Transport and Access	3. BESS Safety, Firewater and Emergency Response The Outline Battery Safety Management Plan addresses thermal runaway, fire, explosion, toxic-gas release, emergency access and contaminated firefighting water, but it is based on a concept design rather than final equipment. BEPS does not assert that toxic exposure to residents is a predicted effect. The concern is whether the final battery system will remain no worse than the system assessed. East Pye should demonstrate, using final equipment information and appropriate testing and consequence modelling, that battery chemistry, spacing, enclosure design and fire behaviour remain within the examined safety envelope.	The Applicant notes this comment and refers to its detailed response clarifying to BEPSG-017 in **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		The final emergency strategy should secure adequate appliance access and turning, firefighting-water availability, drainage isolation, contaminated-firewater containment, incident command, public-route management, post-incident monitoring and environmental remediation.	
WR-BEPSG-005	Water Environment Ground Conditions	4. Groundwater and Private Water Supplies East Pye identifies 29 private water supplies or permitted abstractions within 1 km of the BESS and substation area, 19 potentially active, and acknowledges uncertainty in some underlying records. The Applicant also proposes post-consent intrusive investigation and Foundation Works Risk Assessment where deep foundations or piling may create groundwater pathways. The Environment Agency has identified the need to address potential contaminant pathways associated with foundation design. East Pye should therefore demonstrate that no relevant deep or piled foundation works can proceed until the necessary investigation, hydrogeological assessment and mitigation have been completed and approved.	The Applicant refers to its detailed responses to BEPSG-015 and BEPSG-017 in **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The assessments presented in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]** and **ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184]** have been undertaken in accordance with the methodology agreed with the Environment Agency. As agreed with the Environment Agency, the ground investigation and associated interpretative assessments, including Foundation Works Risk Assessment etc., can be undertaken post-consent. After detailed consultation with the Environment Agency (EA) the Applicant has submitted a revised **Outline BSMP [REP1-066]** to include all requisite firefighting water capture and incident alert details. Section 4.5 documents the drainage strategy for the

ID	Theme	Comments/Issues Raised	Applicant's Response
		The BESS drainage and firewater strategy should be integrated with groundwater protection. Where a credible pathway to a private supply cannot be excluded, East Pye should secure proportionate baseline monitoring, follow-up monitoring, incident response and remediation.	BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the **Outline BSMP [REP1-066]** is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The EA is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA has been submitted at Deadline 1, with updated versions submitted throughout examination.
WR-BEPSG-006	Noise and Vibration	5. Noise and the Very Quiet Rural Environment Operational noise is a major local issue because the BESS, transformers, inverters, cooling equipment and substations would operate within a very quiet rural soundscape, with periods recorded below 25 dB. The assessment relies on example plant and an indicative layout because final	Operational noise is controlled through the **Outline OEMP [REP1-060]**, including separate requirements for the BESS and other electrical infrastructure. The detailed OEMP must be substantially in accordance with the **Outline OEMP [REP1-060]** and approved by the relevant planning authority. This is secured by Requirement 14 of the **Draft DCO [REP1-014]**. Final equipment selection, layout and mitigation must therefore achieve the secured operational noise controls.

ID	Theme	Comments/Issues Raised	Applicant's Response
		equipment has not been selected. The independent Oakridge review identifies uncertainty concerning plant numbers, source data, low-frequency propagation, tonality, barrier performance and assumptions about masking during quiet night-time conditions. The issue is not that unacceptable noise has already been proven. It is that East Pye should demonstrate that it can be ruled out for the final plant. A final cumulative acoustic assessment should use the selected equipment and layout, apply appropriate BS 4142 acoustic-character corrections, demonstrate performance during the quietest relevant periods and secure post-commissioning verification and corrective action. The retained National Grid Substation should also be included in the long-term acoustic position where it remains after BESS decommissioning.	
WR-BEPSG-007	Landscape and Visual Ecology and Biodiversity Soils and Agricultural Land	6. Landscape, Ecology, Agricultural Land and Rural Character The BESS/Site 1 locality is open plateau farmland with expansive skies, long views, quiet lanes, PRoWs, hedgerows, mature trees, historic buildings and a relatively tranquil, dark rural character. East Pye's	The Applicant refers to its response to BEPSG-011 with regards to the comments on landscape, and to BEPSG-013 and BEPSG-014 as a response on ecology and biodiversity within **The Applicant Response Relevant Representations Part 3 -**

ID	Theme	Comments/Issues Raised	Applicant's Response
		own assessment identifies significant adverse landscape and visual effects in this area. Planting may reduce some views over time, but it does not remove the infrastructure or the intervening years of effect, and may itself change the open plateau character. East Pye should provide receptor-specific assessment of the combined BESS, Project Substation, National Grid and associated works at construction, opening, later mitigation stages and after solar/BESS decommissioning. Ecologically, East Pye has undertaken substantial Scheme-wide surveys, but the BESS/Site 1 hard-infrastructure area requires a clear local schedule showing habitat loss, ponds and buffers, bat dark corridors, breeding-bird impacts, hedgerows, movement routes, fencing, drainage, lighting, licensing dependencies and BNG compensation. The BESS area is described as essentially Grade 2 Best and Most Versatile agricultural land. East Pye should quantify permanent and temporary BMV loss for the BESS and substations and distinguish land genuinely capable of	**Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The BMV totals for land affected, including the distinction between temporary and permanent effects is assessed for all components of the development in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The impacts are set out in Table 15.14 by area and ALC grade. The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which confirms that from a policy perspective there is no general requirement to consider alternatives or to establish whether a development represents the best option, and paragraph 4.3.22 of NPS EN-1, which provides that the consideration of alternatives should be carried out in a proportionate manner, with only alternatives that meet the objectives of the Scheme being considered. As such, a revised alternatives assessment is not required.

ID	Theme	Comments/Issues Raised	Applicant's Response
		restoration from land affected by retained infrastructure, foundations, access or drainage.	
WR-BEPSG-008	Transport and Access Recreation and Public Rights of Way	7. Access, PRoWs and Hundred Lane/RB19 East Pye should provide one final access and PRoW plan distinguishing construction, operational, emergency and permanent maintenance routes. Of particular concern is the proposed crossing of Hundred Lane/RB19, a historic rural route, which is described as both a construction haul crossing and permanent maintenance access. East Pye should identify the assets the crossing serves, explain why earlier access arrangements are insufficient, provide its design and expected use, state whether it remains after decommissioning, and explain how the permanent change entered the design and consultation process.	The Applicant refers to its response to Adrian Ramsay MP under AR-004 regarding Hundred Lane and RB19 in the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1-099]**. The Applicant also notes that access arrangements associated with the Scheme are identified within the application documents, including **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**, and form part of the assessed Scheme. Detailed design would be undertaken following the grant of development consent and would inform the final design of access arrangements and associated highway works.
WR-BEPSG-009	Cumulative and In-Combination Effects Point of Connection	8. Cumulative Effects, Permanence and Post-Year-60 Position The BESS Site is a cumulative impact focal point. Residents and environmental receptors may experience construction traffic, noise, lighting, visual change,	The Applicant refers to its response to BEPS-005 and BEPS-012 within **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. Regarding the interrelationships between environmental effects, **ES Volume 1,**

ID	Theme	Comments/Issues Raised	Applicant's Response
		PRoW disruption, drainage risk and ecological disturbance together. East Pye should provide receptor-based cumulative schedules and a realistic combined construction programme rather than leaving the ExA to reconstruct interactions across separate chapters. The distinction between time-limited and permanent infrastructure is also fundamental. The solar/BESS development is described as having an approximately 60-year operational period, whereas the National Grid Substation and Grid Connection Infrastructure are described as remaining. East Pye and NGET should therefore identify which access, drainage, landscaping, noise sources and mitigation remain after Year 60 and who is responsible for them.	**Chapter 19 – In Combination Effects Assessment [APP-055]** presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment. The Applicant further refers to its response to WR-BEPS-227 and BEPS-247 in Table 2.1 regarding the assessment of the operational period and permanent infrastructure.
WR-BEPSG-010	Concluding Remarks Requests to the ExA	9. Conclusion and Examination Request BEPS respectfully asks the Examining Authority to require East Pye, and NGET where relevant, to demonstrate the final proposition for which consent and land powers are sought. This should include:	The Applicant refers to its responses to WR-BEPSG-001 to WR-BEPSG-009 above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		• a transparent BESS need and alternatives case; • a definitive spatial description of the BESS/Site 1/National Grid cluster; • fixed environmental and safety limits for material deferred design choices; • coordinated fire, drainage, groundwater, private-water, noise, ecology, landscape, transport and agricultural-land controls; • receptor-based cumulative assessment; • clear responsibility for retained National Grid infrastructure and the post-Year-60 position; and • clear DCO mechanisms for approval, monitoring, verification and corrective action.	
WR-BEPSG-011	Concluding remarks	Local residents should not be required to design the Scheme, reconstruct the Applicant's case from dispersed documents, or prove that an alternative would work before East Pye has demonstrated why its chosen development is justified.	The Applicant notes this comment and refers to responses provided above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		Where acceptability depends upon an indicative layout, future management plan, deferred assessment or later mitigation, East Pye should identify the assessed worst case, the binding control that secures it, the responsible body and the means by which compliance will be monitored and enforced. Where material uncertainty remains, that uncertainty should remain with the Applicant rather than being assumed away.	

3.2 The Applicant's Response to BEPS – Great Moulton's Written Summary of Representation – Site 1 / Great Moulton Grid Infrastructure

Table 3.2 The Applicant's Response to BEPS-Great Moulton [REP1-328]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPSG1-001	Site Selection and Alternatives Scheme Description	1. Core Position BEPS-Great Moulton does not dispute the national policy support for renewable electricity generation or the contribution that solar generation can make. Our objection is more specific. East Pye must demonstrate that the particular land, infrastructure and configuration proposed at Site 1, particularly Sub-Site 1B, are justified, that reasonable alternatives have been considered on a consistent basis, and that the environmental and community effects of the final development are adequately assessed and secured.	The Applicant's approach to the site selection of the National Grid Substation, including consideration of Sub-Site 1B, is set out within the **Site Selection Assessment [APP-215]**, which had regard to the Holford and Horlock Rules and demonstrates that a robust and criteria-led alternatives assessment has been undertaken, considering environmental, technical, planning and operational factors. The Applicant has made further submissions in respect of site selection under Q1.3.1 and Q1.3.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**. It is considered by the Applicant for the reasons set out in the **Planning Statement [REP1-074]** that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case.
WR-BEPSG1-002	EIA Methodology Scheme Description	Site 1 should not be treated simply as part of a temporary solar farm. It is the location at which the National Grid Substation, 400 kV Project Substation, Grid Connection Infrastructure, overhead-line and pylon works, cabling, access, drainage, security	The technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** which includes all components of the Scheme, including operational phase maintenance and replacement activities. The

ID	Theme	Comments/Issues Raised	Applicant's Response
		infrastructure and the adjoining BESS interface are concentrated. These components are functionally linked and should be examined cumulatively as a single grid-infrastructure hub.	assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. The Applicant also refers to its response to BEPSG-005, BEPSG-012, GMAG-232, GMAG-233, GMAG-234, and GMAG-235 within **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPSG1-003	Site Selection and Alternatives	2. Site Selection, Alternatives and Grid Deliverability East Pye has undertaken a site-selection exercise, including APP/7.20, APP/6.1.5 and APP/7.17. The outstanding issue is whether the submitted material provides a sufficiently clear and auditable explanation of how the present Site 1/BESS configuration emerged and why it remains justified. The original solar-site search was undertaken when Norwich Main was being considered as the connection point. Following the move to a connection on the Bramford–Norwich 400 kV line, Sites 1 and 2 were added and the National Grid Substation options evolved through Options 1, 2 and 3 and subsequently Options 4A and 4B at Great Moulton. BEPS asks the ExA to require a dated, like-for-like comparison showing when	The Applicant notes this comment and refers to response BEPSG-005 in **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		each option was identified, what evidence was available, what technical and environmental criteria were applied, and whether Options 4A and 4B received scrutiny comparable with Options 1–3.	
WR-BEPSG1-004	Site Selection and Alternatives	The Applicant should also explain transparently when land availability and landowner willingness entered the process and distinguish land rejected for environmental or technical reasons from land not progressed because it was unavailable. Land availability may be a legitimate consideration, but it should not obscure whether reasonable alternatives were compared consistently.	The Applicant notes this comment and refers to its response to Great Moulton Action Group under GMAG-008 in **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**. The Applicant has made further submissions in respect of site selection under Q1.3.1 and Q1.3.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP1-083]**.
WR-BEPSG1-005	Point of Connection	NGET's position also raises a material examination issue. The final connection solution, the responsibilities of East Pye and NGET, and the relationship between the solar and BESS connection positions should be clarified. If the eventual NGET solution could differ materially from that presently shown, East Pye should demonstrate that the Site 1 land take, environmental assessment, compulsory-acquisition case and DCO powers remain justified.	The Applicant refers to National Grid Electricity Transmission Plc's Relevant Representation [RR-1408] and the Applicants response at NGET-006 and NGET-007 in **The Applicant's Response to Relevant Representations Part 2 [PDA-009]** which sets out information regarding the Applicant's grid connection for the generating station and the BESS. The environmental assessment is conducted on a reasonable worst-case basis within the Rochdale Envelope, meaning maximum parameters for the authorised development have been used rather than the precise indicative connection design. Any final NGET solution must remain within those assessed parameters and be controlled through the

ID	Theme	Comments/Issues Raised	Applicant's Response
			DCO Requirements (including Requirements 3 and 5, which prevent materially new or different environmental effects without further assessment). If NGET wished to construct a design that fell outside of those parameters, then either the DCO would need to be amended, or separate consent obtained under the Town and Country Planning Act 1990 and further assessment would be required at that stage. The compulsory acquisition powers can only be exercised for the purpose for which they have been sought. Therefore, if the final NGET solution was to be located on other land, then the compulsory acquisition powers could not be exercised.
WR-BEPSG1-006	EIA Methodology Construction and Decommissioning	3. Permanence, Design Flexibility and DCO Controls East Pye's own material distinguishes infrastructure intended to be removed after the approximately 60-year operational period from the National Grid Substation and Grid Connection Infrastructure intended to remain. The retained infrastructure should therefore be assessed as a long-term or permanent presence unless a secured end date is identified.	The Applicant notes this comment and refers to response to Block East Pye Solar under WR-BEPS-227 and WR-BEPS-247 in Table 2.1 of this document regarding assessment of the operational period and permanent infrastructure.
WR-BEPSG1-007	Construction and Decommissioning	The Applicant should provide a definitive schedule showing what will be removed, what will remain, who will own and maintain retained infrastructure and	The Applicant notes this comment and refers to response BEPSG-009 and BEPSG-010 in **The Applicant Response Relevant Representations**

ID	Theme	Comments/Issues Raised	Applicant's Response
		mitigation, and what Site 1 will look like after solar, BESS and Project Substation decommissioning.	**Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPSG1-008	EIA Methodology Construction and Decommissioning Design Principles, Parameters and Commitments	Because the Scheme relies on the Rochdale Envelope and later detailed design, East Pye should identify every environmentally material parameter that remains flexible and demonstrate the assessed worst case. Each material safeguard relied upon to reach a "not significant" or acceptable conclusion should be linked to a specific DCO Requirement, certified plan, approval body, monitoring mechanism and corrective action.	The Applicant refers to its response to BEPS-146 to BEPS-160 within **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPSG1-009	Landscape and Visual	4. Landscape, Residential Amenity and Noise Great Moulton is an open, quiet rural plateau characterised by expansive views, dark skies, agricultural land, historic lanes and public rights of way. The proposed grid hub would introduce substantial electrical infrastructure, fencing, security equipment, access, pylon works and associated activity into that setting. The Applicant's own landscape material identifies significant construction effects at Site 1. BEPS asks for verified plans and representative visualisations showing the	The Applicant notes this comment and refers to response BEPSG-011 in **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.

ID	Theme	Comments/Issues Raised	Applicant's Response
		combined grid infrastructure from the most affected homes and PRoW, with accurate coordinates and measured relationships to the development envelope.	
WR-BEPSG1-010	Noise and Vibration	Operational noise also requires further certainty. Great Moulton has a very low rural background sound environment. The submitted assessment relies on indicative plant and layout assumptions. East Pye should therefore demonstrate the cumulative operational effect of the National Grid Substation, Project Substation, BESS, transformers, inverters, cooling plant and other electrical equipment, including tonal and low-frequency characteristics during quiet night-time conditions. Enforceable cumulative limits, post-installation verification and corrective mitigation should be secured.	Operational noise is controlled through **Outline OEMP [REP1-060]**, including separate requirements for the BESS and other electrical infrastructure. The detailed OEMP must be substantially in accordance with the **Outline OEMP [REP1-060]** and is secured by Requirement 14 of the **Draft DCO [REP1-014]**. Final equipment selection, layout and mitigation must therefore achieve the secured operational noise controls.
WR-BEPSG1-011	Soils and Agricultural Land	5. Agricultural Land, Water and Ecology Site 1 includes substantial Grade 2 Best and Most Versatile agricultural land. The National Grid Substation would cause permanent loss of Grade 2 land, while other grid and BESS infrastructure would also occupy high-quality agricultural land. East Pye should provide a field- and component-specific schedule	The Applicant notes this comment and refers to its response provided under WR-BEPSG1-007.

ID	Theme	Comments/Issues Raised	Applicant's Response
		distinguishing temporary disturbance, long-term occupation and permanent loss, and explain whether the later detailed ALC evidence caused the earlier site-selection conclusions to be reconsidered.	
WR-BEPSG1-012	Water Environment Ground Conditions	For groundwater and private water supplies, the concern is not that no assessment exists, but that important matters remain dependent on later ground investigation, Foundation Works Risk Assessment and detailed design. East Pye should provide a consolidated source–pathway–receptor assessment covering private water supplies, piling and deep foundations, cable trenches, transformer oils, drainage, contaminated runoff, monitoring, trigger levels and alternative-supply arrangements.	The Applicant refers the respondent to WR-BEPSG-005.
WR-BEPSG1-013	Ecology and Biodiversity	The final infrastructure layout should also be demonstrated to remain within the ecological assessment, including impacts on hedgerows, trees, ponds, bat flight lines and dark corridors, breeding birds, great crested newts and other protected species. Any licensing dependencies should be identified before reliance is placed on the proposed mitigation.	The Applicant refers the respondent to WR-BEPSG-007.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPSG1-014	Recreation and Public Rights of Way Transport and Access	6. Access, PRoW, Safety and Whole-Life Effects The Applicant should reconcile all construction, abnormal-load, operational and emergency access arrangements for Station Road, Frith Way, Lodge Road, Hundred Lane/RB19 and the relevant Site 1 accesses. The purpose and permanence of the Hundred Lane/RB19 crossing should be confirmed, together with restoration obligations if it is not required for retained National Grid infrastructure.	The Applicant notes the comments regarding access arrangements, Public Rights of Way and the proposed Hundred Lane/RB19 crossing. Further information on these matters is provided within the Applicant's response to WR-BEPSG-008 in Table 3.1. The Applicant also notes that access arrangements associated with the Scheme are identified within the application documents, including **ES Volume 2, Figure 11.8 – Likely and Suitable Routes to the Scheme [APP-095]**, and form part of the assessed Scheme. The final design of access arrangements and any associated highway works would be developed during the detailed design stage following the grant of development consent.
WR-BEPSG1-015	Recreation and Public Rights of Way Transport and Access	A coordinated PRoW schedule should address FP13, FP14, RB19/Hundred Lane and other affected routes, including closures, crossings, permanent access use, vegetation removal, safety, visual effects and restoration.	The Applicant notes the comments regarding Public Rights of Way and access arrangements. The Applicant refers to its response to WR-BEPSG-008 in Table 3.1 regarding Hundred Lane/RB19. Information regarding Public Rights of Way, including the management of temporary closures, diversions, crossings and reinstatement, is provided within the **Outline PRoWPPMP [APP-203]**. A detailed Public Rights of Way and Permissive Paths Management Plan would be prepared during the detailed design stage and secured through the DCO requirements.

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPSG1-016	Transport and Access	Site 1 is also a safety-critical infrastructure cluster. East Pye, with NGET and the emergency services where appropriate, should provide an integrated emergency-response statement covering the National Grid Substation, Project Substation and BESS interface, including transformer and electrical incidents, firefighting access, water supply, contaminated-water and oil containment, cordons, road restrictions and operator responsibilities.	The Applicant refers the respondent to comments regarding emergency access in WR-BEPSG-004.
WR-BEPSG1-017	EIA Methodology Transport and Access	The 60-year period should not be treated as one construction event followed only by routine operation. Foreseeable replacement of panels, BESS equipment, transformers and electrical plant may generate renewed HGV movements, abnormal loads, lifting activity, noise and temporary compounds. These whole-life effects should be shown to remain within the assessed and secured envelope.	See the Applicant's response to WR-BEPS-227 in Table 2.1 regarding assessment of the operational period.
WR-BEPSG1-018	Cumulative and In-Combination Effects	7. Cumulative Effects and Requested Examination Approach The principal concern is fragmentation. Residents will experience the National Grid Substation, Project Substation, BESS, pylons, cables, traffic, noise, lighting, drainage, fencing, PRoW changes and landscape effects together.	The technical assessments within the **ES [APP-042 to APP-056]** are informed by the description of the Scheme provided within **ES Volume 1, Chapter 4 – The Scheme [REP1-022],** which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. The Applicant also

ID	Theme	Comments/Issues Raised	Applicant's Response
		BEPS therefore asks for a place-based cumulative assessment for Great Moulton and the Site 1/BESS cluster, rather than reliance solely on separate technical chapters.	refers to its response to BEPSG-005, BEPSG-012, GMAG-232, GMAG-233, GMAG-234, and GMAG-235 within **The Applicant Response Relevant Representations Part 3 - Other Statutory Bodies, Undertakers and Notable Parties [PDA-010]**.
WR-BEPSG1-019	Scheme Description	BEPS does not ask the ExA or local residents to design the Scheme or reconstruct the Applicant's case from dispersed documents. East Pye, with NGET where relevant, should provide a consolidated Site 1 Grid Infrastructure Reconciliation Plan and Compliance Schedule identifying each component, its maximum parameters, temporary or permanent status, delivery and operational responsibility, decommissioning position, environmental effects and the DCO mechanism securing each material commitment.	The Applicant notes this comment and refers to its responses provided above.
WR-BEPSG1-020	Concluding Remarks	Before significant weight is placed on the Applicant's conclusions, the Examination should be satisfied that the final Site 1 Grid Hub is clearly defined; that its selection and retention have been transparently justified against reasonable alternatives; that the final NGET connection solution is deliverable; that permanent and cumulative effects are fully understood; and that detailed design	The Applicant notes this comment and refers to its responses provided above.

ID	Theme	Comments/Issues Raised	Applicant's Response
		cannot result in effects greater than those assessed. The burden of demonstrating those matters rests with East Pye and NGET where relevant, not with affected residents.	

3.3 The Applicant's Response to the Noise Impact Assessment Report submitted by Oakridge Taylor on behalf of BEPS

Table 3.3 Applicant's response to Noise Impact Assessment Report submitted on behalf on BEPS [REP1-385]

ID	Theme	Comments/Issues Raised	Applicant's Response
WR-BEPSH1-001	Noise and Vibration	Oakridge acknowledges that the baseline survey was extensive, covering 51 monitoring positions with measurements generally undertaken over six to eight days. However, because much of the survey was unattended, it was not possible to identify the dominant sound source throughout each monitoring period.	Background sound levels were derived from the measured $L_{A90,15min}$, being the sound level exceeded for 90% of each 15-minute period. Isolated or short-duration higher-level events, such as occasional vehicle movements or temporary local activities, would not ordinarily determine this parameter. Representative background levels were selected through review of the measured L_{A90} distributions, including the period-specific histograms presented for MP41 to MP44 in **ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]**. This provides a more robust basis than reliance on individual measurements and limits the influence of isolated temporary events.
WR-BEPSH1-002	Noise and Vibration	Oakridge focuses on MP41 to MP44 and questions whether these positions and the adopted acoustic conditions are representative of the most affected homes around Great Moulton, including dwellings on Broadgate Lane and Station Road.	The residential and other noise-sensitive receptors represented by MP41 to MP44 are identified in Table 12-16 of **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]**. The measurement positions were selected to represent groups of receptors exposed to comparable local acoustic conditions rather than to undertake monitoring at every individual property.

ID	Theme	Comments/Issues Raised	Applicant's Response
			The location and observed sound climate at each position are described in **ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178].** MP41 is noted to be located near to receptors on Station Road and is at a location considered representative of receptors along Station Road. MP42 is at a location which is considered representative of receptors on Broadgate Lane. MP44 is located to the south of Great Moulton, and due to it being in a more isolated location, is expected to experience equivalent or lower typical background sound levels than within Great Moulton.
WR-BEPSH1-003	Noise and Vibration	Oakridge says the disclosed information does not establish that road traffic is a reliable or continuous masking source at Great Moulton, particularly during quiet night-time periods. It refers to strategic road-noise mapping indicating that the A140 may not materially influence the locality.	The operational assessment does not rely upon continuous road traffic masking to demonstrate acceptability. The BS 4142 comparison is based on measured background sound levels for the relevant assessment periods. References to road traffic describe the observed acoustic context and are not a substitute for the measured background sound level. Strategic road-noise mapping does not supersede the site-specific monitoring undertaken for the Scheme.
WR-BEPSH1-004	Noise and Vibration	Oakridge considers that Great Moulton has a very quiet rural acoustic environment and that operational sound	The Applicant acknowledges that the rural character and low night-time background sound levels are relevant to the assessment of context under BS 4142. These conditions are reflected in

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		may be noticeable even if the predicted broadband level is relatively low.	the period-specific background sound levels and operational criteria.
WR-BEPSH1-005	Noise and Vibration	The operational assessment uses example equipment data and an indicative plant layout because final plant specifications are not available. Oakridge says that plant numbers, types, locations, source heights and operating regimes could affect both the total sound level and acoustic character.	The Applicant acknowledges that the final manufacturer and detailed arrangement of the operational plant have not yet been selected. This is addressed through a reasonable worst-case assessment using representative plant sound power levels, conservative operating assumptions and an example layout. The final equipment and layout must be designed so that the secured operational noise limits secured through the **Outline OEMP [REP1-060]** are achieved.
WR-BEPSH1-006	Noise and Vibration	Oakridge says it is not clear how many battery storage units were included in the operational model.	The final number of BESS enclosures is not fixed by the DCO Application because it will depend upon the selected technology, power capacity and storage duration. The BESS is therefore controlled through the design parameters set out in **ES Volume 1, Chapter 4 - The Scheme [APP-104]**. For the purposes of the operational noise assessment, the acoustic model included 544 BESS containers and 152 associated BESS inverters within the indicative arrangement. The representative sound power levels reported in **ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]** were applied to each modelled BESS container and inverter. These quantities represent the arrangement assessed for operational noise purposes; they do not prescribe the final number or configuration of

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			units. Irrespective of the final plant selection or layout, the detailed design will be required to demonstrate that the combined operational rating level from the final BESS containers, inverters and associated plant complies with the secured operational noise limits.
WR-BEPSH1-007	Noise and Vibration	Oakridge acknowledges that the modelling prudently assumes plant operates simultaneously, continuously and at maximum output, but questions whether the exception made for reduced BESS fan duty is adequately defined.	Reduced fan-speed duty is an embedded mitigation measure relied upon by the operational noise assessment. Paragraph 12.7.15 of **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]** states that reduced fan-speed duty during the night-time and early-morning periods could be controlled through an automated timer system. The same measure is identified as an embedded operational commitment in the **Commitments Register [APP-221]** and is to be secured through the detailed OEMP under Requirement 14. Irrespective of the final fan duty, the detailed design will be required to demonstrate that the combined operational rating level from the final BESS containers, inverters and associated plant complies with the secured operational noise limits.
WR-BEPSH1-008	Noise and Vibration	Oakridge says that only broadband A-weighted sound power levels have been disclosed and that these do not allow independent verification of frequency-dependent propagation or barrier performance.	The sound source data reported in **ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]** are representative example data for potential equipment types and are not measurements of the final equipment, which will be selected at detailed design. The data

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			have been used to establish an appropriate acoustic assessment and design envelope, based on the modelled plant quantities, layout, operating assumptions and embedded mitigation. The detailed design must demonstrate that the selected plant, layout and operating conditions remain within the assessed acoustic envelope and comply with the secured operational noise limits. Where necessary, this will require quieter equipment or additional mitigation.
WR-BEPSH1-009	Noise and Vibration	Oakridge says that propagation at frequencies such as 50 Hz and 100 Hz, and the performance of barriers at those frequencies, cannot be checked from broadband information alone.	The sound source data reported **in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]** are representative example data for potential equipment types and are not measurements of the final equipment, which will be selected at detailed design. The data has been used to establish an appropriate acoustic assessment and design envelope, based on the modelled plant quantities, layout, operating assumptions and embedded mitigation. The detailed design must demonstrate that the selected plant, layout and operating conditions remain within the assessed acoustic envelope and comply with the secured operational noise limits. Where necessary, this will require quieter equipment or additional mitigation.
WR-BEPSH1-010	Noise and Vibration	The Applicant's material recognises that high-voltage transformers may generate	This matter has previously been addressed in the Applicant's response to South Norfolk Council

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		a characteristic 100 Hz hum. Oakridge questions whether the conclusion that this would be masked by broadband BESS noise has been adequately demonstrated. Oakridge says that, without disclosed one-third-octave data, it cannot independently verify why no tonal or other acoustic-feature correction has been applied.	under SNC-133 in Table 3.1 of **The Applicant's Response to Relevant Representations Part 1 - Host and Neighbouring Local Authorities [REP1-019]**. The Applicant recognises that high-voltage transformers can generate a characteristic 100 Hz hum and associated harmonics. The assessment initially concluded that the transformer contribution would be unlikely to be distinguishable at residential receptors because of the broadband sound from the BESS containers and inverters. In response to the request for further justification, an objective assessment of tonality was undertaken at NSR3B, the anticipated worst-affected receptor, using the procedure set out in Annex C of BS 4142:2014+A1:2019. That assessment indicated that no identifiable tone would be present at the receptor. The conclusion is therefore supported by a receptor-specific tonal assessment and does not rely solely on a general assumption that transformer noise would be masked by other plant. The assessment was undertaken using representative example equipment data because the final plant has not yet been selected. The final plant selection and detailed design must therefore demonstrate compliance with the assessed operational noise limits, including the application of

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			any acoustic-feature correction required by the characteristics of the selected equipment.
WR-BEPSH1-011	Noise and Vibration	Oakridge says residents will experience the BESS, Project Substation, National Grid Substation, transformers, inverters and associated equipment as one operational infrastructure cluster. It seeks control of the combined operational effect rather than separate assessment of individual assets.	The Applicant agrees that receptors will experience the combined sound from the operational plant, rather than the contribution from each item in isolation. This is the basis on which the operational noise assessment within **ES Volume 1, Chapter 12- Noise and Vibration [APP-048]** has been undertaken. The operational control is similarly expressed in terms of the overall free-field rating level from the Scheme at the relevant receptor façades. It does not provide separate noise allowances for individual BESS containers, inverters or substations.
WR-BEPSH1-012	Noise and Vibration	Oakridge highlights that National Grid infrastructure may remain after the time-limited solar and BESS development is decommissioned. It says the long-term acoustic effect should therefore be distinguished from that of temporary plant.	The Applicant confirms that the National Grid Substation and Grid Connection Infrastructure are permanent infrastructure and will remain following decommissioning of the time-limited solar and BESS elements. This distinction has been recognised in the assessment and previously confirmed during the Examination. During the operational phase, the assessment considers the combined sound from the BESS, Project Substations and National Grid Substation at residential receptors. Following decommissioning, the BESS containers, BESS inverters and Project Substation plant would no longer contribute to the receptor sound level. The

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			specific sound level from the retained infrastructure would therefore be lower than the assessed combined operational level. The Applicant acknowledges that removal of the broadband BESS sound could change the relative prominence of the transformer contribution. However, even if an acoustic-feature correction were required for the retained transformer plant, that correction would be applied to a materially lower specific sound level. It would not, therefore, necessarily result in a higher rating level or a worsening of the assessed operational effect. Accordingly, the Applicant considers that the removal of the BESS and Project Substation sources would reduce the overall operational sound contribution. The retained National Grid infrastructure would remain subject to the applicable acoustic design and operational controls, including consideration of acoustic character where relevant.
WR-BEPSH1-013	Noise and Vibration	Oakridge requests commissioning-stage verification using the final equipment and layout, with corrective mitigation if operational noise is more intrusive than predicted.	The Applicant acknowledges that final equipment selection and layout will be determined at the detailed-design stage. Before installation, the final plant schedule, equipment sound data, layout, operating conditions and mitigation will be reviewed to demonstrate that the completed design remains within the acoustic assessment envelope and complies with the operational noise limits

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			secured through the detailed OEMP which must be approved by the relevant planning authority.
WR-BEPSH1-014	Noise and Vibration	Oakridge says the likely audibility, character and intrusiveness of operational noise at the most affected dwellings cannot be determined confidently from the disclosed information, especially at night.	The Applicant does not agree that the likely operational noise effect cannot be determined with appropriate confidence. During the night-time period, the highest assessed exceedance occurs at NSR3B, where the predicted rating level is 33 dB $L_{Ar,15min}$, compared with a representative background sound level of 31 dB $L_{A90,15min}$, a difference of +2 dB. During the early-morning period, the predicted rating level is 33 dB $L_{Ar,15min}$, compared with a background sound level of 32 dB $L_{A90,15min}$, a difference of +1 dB. These differences fall at the lower end of the BS 4142 indication of a low impact. Potential audibility does not, in itself, establish material intrusiveness or a significant adverse effect. At NSR3B, the predicted worst-case night-time specific sound level of 33 dB $L_{Aeq,T}$ externally corresponds to approximately 23 dB(A) internally with a partially open window. **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]** identifies this as representing good acoustic conditions within a bedroom at night and as being below the relevant BS 8233 guideline. Acoustic character has also been considered. An objective assessment undertaken at NSR3B using Annex C of BS 4142:2014+A1:2019 indicated that there would be no identifiable tone at the receptor

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			for the representative equipment assessed. The separate low-frequency assessment also found that calculated levels at the assessed worst-case high-sensitivity receptors were below the NANR45 criteria. The Applicant therefore considers that the small margins over background, low absolute sound levels and assessment of tonal and low-frequency characteristics provide an appropriate basis for concluding that significant adverse operational noise effects would not arise.