Planning Inspectorate

Application by East Pye Solar Limited for the East Pye Solar project

The Examining Authority's second written questions and requests for information (ExQ2): Issued on 10 November 2026

Responses are due by deadline 3: Tuesday 24 November 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information – ExQ2. If necessary, the examination timetable enables the ExA to issue a further round of written questions on 19 January 2027. If this is done, the further round of questions will be referred to as ExQ3.

Questions are set out using an issues-based framework generally derived from the initial assessment of principal issues provided as **annex C** to the rule 6 letter dated 15 July 2026, with additional sections where appropriate. Questions have been added to the framework of issues as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Questions have been specifically directed to the following parties: the applicant, Anglian Water Services, Block East Pye Solar, Environment Agency, General Aviation Awareness Council, Historic England, National Gas Transmission plc, National Grid Electricity Transmission plc, National Highways, Natural England, Norfolk County Council, Norfolk Fire and Rescue Service, Norfolk Gliding Club, Norfolk Wildlife Trust, South Norfolk Council and Suffolk County Council.

Each question has a unique reference number which starts with 2 (indicating that it is from ExQ2) and then has an issue number and a question number. When you are answering a question, please start your answer by quoting the unique reference number.

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: Examination library. It will be updated as the examination progresses.

Use of artificial intelligence (AI) in casework evidence

If you use AI to create your submission, you should tell us that you have done this. You should specify which systems or tools you have used, the source of the information that the AI system has based its content on, and what information the AI has been used to create or alter. Further information can be found in the Planning Inspectorate's guidance. By following this guidance, you will help the ExA to understand the origin and accuracy of the information submitted, thereby supporting fair and impartial decision-making. **If you do not declare the use of AI in any evidence submission where it has been used or remove evidence such as watermarks, we reserve the right to reject the submission.**

You should respond to the questions by using the **Have your say** function on the project page of the National Infrastructure website and selecting 'Responses to Examining Authority's Second Written Questions (ExQ2)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: Examining Authority's Written Questions 2 (ExQ2) (Word Version)

Abbreviations used:

AIL	abnormal indivisible load
AIS	air insulated switchgear
ALARP	as low as reasonably practicable
ALC	agricultural land classification
BEPS	Block East Pye Solar
BESS	battery energy storage system
BMV	best and most versatile
BNG	biodiversity net gain
CAST	Combined Aerodrome Safeguarding Team
CLG	community liaison group
CWS	County Wildlife Site
D	deadline
dDCO	draft Development Consent Order
DIO	Defence Infrastructure Organisation
EA	Environment Agency
EFATO	engine failure after take-off
EIA	environmental impact assessment
EMF	electromagnetic fields
EN-1	Overarching National Policy Statement for Energy, 2025
EN-3	NPS for Renewable Energy Infrastructure, 2025
EN-5	NPS for Electricity Networks Infrastructure, 2025
ES	Environmental Statement
ExA	Examining Authority
EZ	environmental zone
FP	footpath
GAAC	General Aviation Awareness Council
GHG	greenhouse gas
GIS	gas insulated switchgear
HDD	horizontal directional drilling
HE	Historic England
HGV	heavy goods vehicle
HRA	Habitats Regulations Assessment
ICNIRP	International Commission on Non-Ionizing Radiation Protection
ISEP	Institute for Sustainability and Environmental Professionals
ISH	issue specific hearing
kV	kilovolt
LIR	local impact report
LLFA	Lead Local Flood Authority

LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
m	metre
MoD	Ministry of Defence
MW	megawatt
NCC	Norfolk County Council
NE	Natural England
NGC	Norfolk Gliding Club
NGET	National Grid Electricity Transmission
NGT	National Gas Transmission plc
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
NWT	Norfolk Wildlife Trust
oBSMP	outline Battery Safety Management Plan
oCEMP	outline Construction Environmental Management Plan
oCTMP	outline Construction Traffic Management Plan
oDEMP	outline Decommissioning Environmental Management Plan
oESSCS	outline Employment, Skills and Supply Chain Strategy
oLEMP	outline Landscape Environmental Management Plan
oOEMP	outline Operational Environmental Management Plan
oPSMS	outline Protected Species Mitigation Strategy
PAIA	Preliminary Arboricultural Impact Assessment
PM	particulate matter
PPW	permitted preliminary works
PPWEMP	Permitted preliminary works environmental management plan
PRoW	public rights of way
PV	photovoltaic
R	requirement
RR	relevant representation
RVAA	Residential Visual Amenity Assessment
SCC	Suffolk County Council
SNC	South Norfolk Council
SoCG	statement of common ground
SoS	Secretary of State for Energy Security and Net Zero
SuDS	sustainable drainage systems
WFD	Water Framework Directive

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ExQ2	Question to:	Question:
1.	**General and cross-topic questions**	
Q2.1.1	The applicant	**Proposed National Grid Substation (Work No.4)** In response to action point 11 of issue specific hearing (ISH)1, the applicant explains that it knows of no reason why the proposed location (of the substation) would be changed, that it is suitable to meet National Grid Electricity Transmission's (NGET's) technical parameters and that the electrical infrastructure required to connect the scheme would fit within the proposed substation parameters. a) Bearing in mind National Grid Electricity Transmission's (NGET) comments in its written representation and response to ExQ1 [REP1-269], that it is not in a position to confirm whether it can support (or otherwise) the design, sizing or location of the proposed substation, what evidence has the applicant provided, and/or what additional evidence can be submitted, to justify its confidence regarding the suitability of the detailed location and design parameters of the proposed substation? b) What would the implications be for the scheme design and its delivery, if the location and/or details of the proposed national grid substation were to change from the proposals in this application (including changes that might be required to the proposed order limits, the proposed works within it, mitigation details and the timescales for delivery)? c) If the proposed National Grid substation was to be in future used to connect to other electricity generation schemes, would this require an extension to the areas of works proposed for Work. No.4? What account has been taken of the potential for future connections or expansions to the proposed substation for other projects? d) NGET says it is in the process of finalising a new connection agreement with the applicant which will not require the applicant to secure land or consent for the National Grid substation. What would the implications of this be for the proposed development and draft Development Consent Order (dDCO) if a new connection agreement is finalised i) before and ii) after the determination of this application (in the event that consent is granted)?
Q2.1.2	National Grid Electricity Transmission plc	**Proposed National Grid substation (Work No.4)** NGET's written representation and response to ExQ1 [REP1-269] provides further explanation regarding the proposed national grid substation, including that it has identified a need for a new electricity substation, known as North Anglia Node 'E' and that a siting study has been commissioned. It is assumed that NGET is referring to North Anglia Node 'A', but please confirm. a) What is the approximate timescale for this siting study, including when it is likely to be in a position to identify (i) a preferred substation site option and (ii) confirm if it would be in a position to support (or otherwise) the design, siting and location of the proposed substation? b) NGET says it is in the process of finalising a new connection agreement with the applicant which will not require the applicant to secure land or consent for the National Grid substation. What is the likely timescale for finalising a new connection agreement? c) Is it likely that the siting study would lead to potential minor alterations to the location of the National Grid substation as proposed in this application, or an entirely new location within the wider area?
Q2.1.3	The applicant	**Proposed National Grid substation (Work No.4)** Based on the responses from NGET [RR-1408, REP1-269], there appears to be some uncertainty as to whether the proposed location, size and design of the National Grid Substation as proposed in this application (Work. No.4) would be suitable to connect the proposed development to the National Grid. Given this doubt and uncertainty, can the applicant refer to any relevant National Policy Statement policy and/or Secretary of State decision making precedent in any recently made Orders for solar schemes that supports the provision of a solar generating scheme without agreement of the details of the point of connection to the National Grid and the necessary associated NGET infrastructure?
Q2.1.4	The applicant	**Battery energy storage system (BESS) (Work No.2)** The dDCO would appear to allow for the BESS to be implemented at a later date to the remainder of the scheme or even not at all. a) What would the specific implications be in terms of the benefits arising from the scheme, its contribution of renewable energy to the national grid and the overall need case should the BESS component (a) not be implemented and (b) be implemented at a later date to the remainder of the scheme (e.g. 1, 5, 10 years etc)? b) Is it necessary to add provision to the dDCO to ensure that the BESS is constructed within an appropriate timescale? c) How have the construction effects been assessed in the ES in the event that the BESS is constructed at a materially later date to the remainder of the scheme, thereby potentially extending the overall construction period in the Great Moulton area?

ExQ2	Question to:	Question:
		d) Explain how the applicant's determination of the maximum size of the BESS, based on the proposed maximum design parameters, has been balanced against its environmental effects, taking account of the mitigation hierarchy and the need to limit as far as possible the negative impacts?
Q2.1.5	The applicant	**Proposed overhead transmission electric line works (Work No.5)** The applicant's response to action point 15 following ISH1 [REP1-098] includes details of the height differences between the existing pylons and the maximum height of the proposed pylons. a) Explain why the proposed pylons need to be up to eight metres higher than the existing pylons. b) How would the final detailed design approach for the pylons appear in relation to the design and appearance of the existing pylons? What additional design measures can be incorporated into the proposals (including the Design principles, parameters and commitments [REP1-078] to secure the best practicable design/appearance for the proposed pylon arrangement? c) Provide an illustrative elevational drawing showing the appearance of the existing and proposed pylons across sub-site 1B.
Q2.1.6	The applicant	**Proposed project substations (Work No.3A)** a) Why are up to three project 400kV and up to three 132kV substations needed in this case for the proposed development? b) In what circumstances might less substations be required in each case? c) Provide a comparison with other recent solar Nationally Significant Infrastructure Projects (both approved and in examination/decision making stage), setting out the number of project substations proposed as a ratio of the total area of PV arrays and expected generation capacity. Explain any differences between this and other schemes in terms of the number of project substations required.
Q2.1.7	The applicant	**Proposed project substations (Work No.3A)** a) Clarify why a choice has not already been made between AIS or GIS for the 400kV and 132 kV substations. b) It is acknowledged that the maximum parameters have been used with regard to land take and scale in the relevant ES assessments. Notwithstanding this, explain for each relevant topic which option (AIS or GIS) would result in the greatest environmental effects, noting any differences in the environmental effects between the two options. c) If there are any differences between effects, why has the option with the minimal overall effects not been chosen?
Q2.1.8	The applicant	**Design parameters – height** The design parameters still, in most cases, refer to a general maximum height. In some cases, such as conversion units and switch rooms, a maximum height is given for the actual structures, but it is not made clear whether this is above existing ground level or in addition to the foundation slabs which also might be above ground level. a) The applicant is requested to clarify this for each relevant proposed work, including a clear indication of the maximum height in relation to existing ground level. b) Further clarification is also required for situations where any structures or buildings are likely to be proposed on sloping ground. What would the approach be in these circumstances (including potential use of cut and fill etc)?
Q2.1.9	The applicant	**Output and overplanting** The applicant's response to action point 21 following ISH1 [REP1-098] explains that the proposed development would indicatively utilise land at 1.0 to 1.1 hectares (2.4 to 2.6 acres) for each megawatt (MW) of output. This is below the 1.6 to 2.25 hectares (4 to 5.6 acres) figures set out in paragraph 2.10.9 of NPS EN-3, noting that this will vary significantly depending on the site, with some being larger and some being smaller. a) Explain why in this case the figures, for the proposed development, are less than those in paragraph 2.10.9 of NPS EN-3. b) The applicant explains that 14% of the order limits is for cable route corridors and that this land has been excluded from the calculation recognising that following installation of the cable route, the area would be reinstated. Noting that paragraph 2.10.9 of NPS EN-3 indicates that 'associated infrastructure' should be included, what would the figures be if the cable route corridor was included in the calculations. c) What approach has been taken in other recently made orders on the question of whether or not the areas of the cable route corridor should be included? d) Explain any implications for the proposed scheme arising from Ross v Secretary of State for Housing, Communities and Local Government and Renewable Energy Systems Ltd [2025] EWHC 1183 (Admin), and any subsequent caselaw.

ExQ2	Question to:	Question:
Q2.1.10	The applicant	**Solar PV Modules (Work No.1)** The Design Principles, Parameters and Commitments [REP1-078] include maximum separation distances of 15m (single axis tracker panels) and 14m (fixed panels) between solar module centrelines. a) Explain why such maximum separation distances are required for the proposed development. b) What separation distances between solar modules has (i) the indicative masterplan and (ii) the estimated energy generation been based on?
Q2.1.11	a) to d) The applicant e) Norfolk County Council and South Norfolk Council (SNC)	**Integrated conversion units/33kV Sub Distribution Switch Rooms and Standalone Conversion Units (Work No.1)** The ExA notes that the applicant appears to be retaining full flexibility at this stage of detailed design for these parts of the proposed development to be located anywhere within the scope of Work No.1. a) Explain in further detail how the ES has considered the effects of these parts of the proposed development upon a) landscape and visual receptors (including views from PRoW), b) residential visual amenity, c) cultural heritage and d) noise. b) Why do the parameters [REP1-078] contain minimum offset distances for solar panels but not for these other elements of Work No.1? c) Why do the parameters contain minimum numbers per site for the operational and maintenance buildings, but not for these elements? d) Explain further how the precise siting of these elements of the proposed development will be determined by the applicant, including the environmental and logistical factors that will be considered in determining their location. e) In order to increase certainty for local residents and to reduce the potential environmental effects, could the Design Principles, Parameters and Commitments be enhanced to provide minimum offset distances from receptors, along with maximum numbers per site/sub-site along with any other additions to the design principles that would minimise their environmental effects.
Q2.1.12	a) to d) The applicant e) Norfolk County Council and South Norfolk Council (SNC)	**Construction working hours** Paragraph 2.3.1 of the Outline Construction Environmental Management Plan (oCEMP) [REP2-010] sets out the core construction hours, excluding start-up and shut down works. These are Monday to Friday from 07:00 to 18:00, Saturday from 08:00 to 13:30 and no Sunday or Bank Holiday working unless crucial for construction. a) Explain what is meant by 'start-up and shut down works'? Would these be likely to lead to any potential issues of noise and disturbance for local residents? Why can such activities not more simply be included within the core construction hours? b) Where works are proposed outside of the core construction working hours (including on Sundays and Bank Holidays), what notification and/or approval process would be provided to the local authority and local residents? c) What other works, other than those set out in the third bullet of paragraph 2.3.1 and in paragraph 2.3.2, might be carried out on Sundays and Bank Holidays that are 'crucial to construction'. d) Can paragraph 2.3.2 be re-phrased or split into separate paragraphs to make it clearer. As currently drafted, it's confusing as the second part referring to 'some activities may be required outside of these times' appears to relate to HGV movement times which, it is assumed, is not the intention. e) Do the local authorities have any further comments on the proposed construction working hours?
Q2.1.13	The applicant Norfolk County Council South Norfolk Council Environment Agency Historic England Natural England	**Permitted preliminary works environmental management plan (PPWEMP)** The applicant has submitted a PPWEMP at deadline 2 [REP2-024]. Permitted preliminary works are defined in article 2 (Interpretation) of the draft Development Consent Order (dDCO). Requirement 13(1) of the dDCO [REP1-014] requires that the permitted preliminary works must be carried out in accordance with the PPWEMP. Therefore, it is particularly important that its contents can be agreed as far as is reasonable during the examination. a) Comments on the contents of the PPWEMP are sought from the relevant interested parties, including the effectiveness of proposed mitigation measures within it. b) Can the applicant set out how it will be seeking to engage with the relevant interested parties with the aim of seeking agreement on its contents before the end of the examination?

ExQ2	Question to:	Question:
Q2.1.14	The applicant	**Proposed community accessible space (Work No.11)** Section 3.20 of the outline Landscape and Ecology Management Plan (oLEMP) [REP1-064] provides outline details of the proposed community accessible spaces. a) Provide further details of the access to the proposed community accessible space at sub sites 4B and 7F and set out how their locations have been considered taking account of the convenience of access to local communities. b) Explain how the implementation of the proposed community spaces would be secured and guaranteed through the DCO. At what point would they be provided (does there need to be a trigger point for their implementation as part of the overall construction works)? c) Provide further details of the funding and management arrangements for their long-term use, including how these would be secured.
Q2.1.15	The applicant	**Construction Programme** SNC in its RR [RR-1795] refers to prevailing weather conditions, including nine months of drought followed by three months of rain which has caused another project consented under a DCO to only undertake nine months of excavation work. Can you respond to this concern and how adverse or prolonged weather conditions have been accounted for in the 24-month construction programme, and as such whether a worst-case scenario has been assessed.
Q2.1.16	The applicant	**Project lifetime** The ExA notes the applicant's response to ExQ1.2.1 regarding the proposed 60 year project lifetime, including the precedent for 60 years in other made orders. a) Notwithstanding the applicant's response to ExQ1.2.1 and the current needs case, what evidence is there that there will still be a demonstrable national need for this solar scheme in, for example, 40 years and what justification is there for effects that could result from the scheme to this rural area and community over a lengthy 60 year period? b) Would it not be more proportionate to limit the duration of consent to, for example, 40 years with the opportunity for this to be extended if there is still a demonstrable need beyond this.
Q2.1.17	The applicant	**Commitment Register** The ExA notes the applicant's revised Commitments Register [REP2-016]. However, the ExA is not satisfied that the register currently provides a sufficiently clear and comprehensive audit trail of the specific mitigation measures, controls and commitments relied upon by the Environmental Statement (ES) and related application documents to avoid, reduce and/or offset likely significant effects. The applicant should update and expand the commitments register to provide a clear mitigation route map within that document. In particular, for each commitment, mitigation measure or control relied upon by the ES, the register should identify: a) the specific impact, effect, risk or objective requiring mitigation or control. b) the relevant phase of the proposed development to which the commitment applies (for example construction, operation, maintenance or decommissioning). c) the mitigation measure, control or commitment proposed. d) the mechanism by which the mitigation, control or commitment would be secured and enforced, including any relevant DCO requirement, protective provision, management plan, agreement, obligation or other consent regime. e) any monitoring, reporting, inspection or review mechanism associated with the mitigation measure, where applicable. f) the source document, including relevant chapter, section and/or paragraph references together with the current Examination Library reference. g) cross-references to any related commitments, mitigation measures or control documents where relevant. The applicant should review the commitments register to ensure that all relevant commitments are included and that a complete audit trail is provided across the application documentation. For example, it is currently unclear how commitments contained within the Design Principles, Parameters and Commitments document [APP-213] are captured within the register. The commitments register should be maintained and updated throughout the examination, and a final version submitted before the close of the examination. The applicant should also comment on whether the final version should be certified as part of the development consent order documentation.

ExQ2	Question to:	Question:
Q2.1.18	The applicant	**Drawing and document clarity** Can the Preliminary Arboriculture Impact Assessment [APP-150] be reviewed and the file size reduced to ensure the appendices are readable, clear and accurate. Consideration should be given to the appendices being separate documents. In terms of clarity and accuracy, can you address the following points: a) Some trees appear to be in the middle of the road, is this accurate. Although the notes section suggests the accuracy of trees cannot be guaranteed, without sufficient accuracy a reliable assessment on effects to trees cannot be undertaken. Please review the document and ensure that trees / hedgerows are in an accurate location. b) The plans in appendix C and D at scale 1:5000 are difficult to use. Tree and group references are somewhat illegible at maximum magnification, particularly where they are obscured by other symbols or markings. Can larger scale plans be provided so that all information is legible. c) Can a clearer legend be provided for trees or groups of trees / hedgerows to be removed. The current use of similar red outlines for buildings and the order limits along with trees / hedges to be removed makes the plans difficult to interpret. A colour marker similar to that used for Veteran trees may be more user friendly. Further detail of the locations of the trees or hedgerows on the plans in tables 1.4 and 1.5 would also assist. d) Can the order limits outline be shown more clearly or so that it is more distinguishable, and it would be useful to include the site/subsite numbers on the plans.
Q2.1.19	The applicant	**PV arrays adjacent to public rights of way (PRoW)** In response to ExQ1.2.11 the applicant has provided an illustrative drawing within appendix 4.1 of the ES [REP1-044] showing a PV table and other works adjacent to a PRoW. Unfortunately, the drawing only shows one part of a PV table (notwithstanding that the maximum height is shown). The applicant is requested to update the drawing showing the full extent of the PV table and also provide an additional illustrative drawing showing the alternative fixed panels.
Q2.1.20	The applicant	**Lighting – worst case scenario** SNC's local impact report (LIR) [REP1-213] (para 7.3.5) sets out that the lighting scheme should be designed as worst-case scenario in Environmental Zone (EZ) E1 due to the isolated and rural nature of the area and use 2,700K lights. Following the applicant's response at deadline 2 [REP2-022] can you explain why EZ E1 has not been adopted, what construction and operational activities require 3,000K lighting and how 2,700K lighting would be secured in more sensitive locations?
Q2.1.21	The applicant	**Application revisions and change control** The applicant has submitted a number of revised application documents during the examination and interested parties [REP2-052] have raised concerns regarding the cumulative effect of those revisions upon the development originally applied for, including in relation to electrical infrastructure, environmental assessment, land requirements and the draft DCO. Reference is made to the Planning Inspectorate's guidance Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination (updated 2 November 2026). a) Explain why the applicant remains satisfied that the application currently before the ExA remains substantially the same project as originally submitted. b) Identify the principal mechanisms by which revisions across application documents are reconciled and controlled, including the role of the Guide to the Application, schedules of changes, tracked documents and other change-control measures.
Q2.1.22	Block East Pye Solar	**Need** BEPS written representations sets out its position on the applicant's needs case [REP1-323 and REP1-386] and a response has been provided by the applicant [REP2-027]. Noting the submissions made, can BEPS summarise its position on need, taking account of relevant policy for national infrastructure projects, including NPS EN-1, and any particular policy references that support its position on the need for the proposed development.
Q2.1.23	The applicant	**Cumulative effects: Assessment of cumulative effects** To what extent have non-significant effects been considered in the applicant's cumulative effects assessment? For each ES chapter, demonstrate how non-significant effects have been considered in the cumulative assessment.

ExQ2	Question to:	Question:
Q2.1.24	The applicant	**Cumulative effects: Interrelationships report** The applicant's response to SNC's LIR (and elsewhere) says that ongoing dialogue is taking place with parties and that the applicant proposes to submit the interrelationships report into the examination once the approach has been agreed. Bearing in mind the time that has elapsed since the beginning of the examination and in order that it can inform, as necessary, discussion at the forthcoming issue specific hearings in December, the ExA requests that this report is submitted for deadline 3.
Q2.1.25	The applicant South Norfolk Council Norfolk County Council	**Cumulative effects: Statements of common ground** The SoCGs submitted at deadline 3 should include details of each specific issue where there is disagreement on cumulative effects, including the schemes that are considered to lead to any cumulative effect and summary of the reasoning for any disagreement.
2. Air quality		
Q2.2.1	a) The applicant b) South Norfolk Council and Norfolk County Council	**Construction dust, particulate matter and secured mitigation** The applicant's Air Quality Assessment [APP-049], Construction and Decommissioning Dust Risk Assessment [APP-180] and oCEMP [REP1-058] conclude that construction dust and particulate matter effects would not be significant following the implementation of mitigation measures. The ExA is seeking to understand the extent to which those conclusions rely upon mitigation that is clearly defined, enforceable and secured through the DCO. a) Applicant: Identify all dust and particulate matter mitigation measures relied upon in reaching the conclusions of the air quality assessment and explain: i. where each measure is secured within the dDCO [REP1-014], oCEMP [REP1-058] or other control documents. ii. whether any dust monitoring, inspection, complaint investigation, trigger levels or corrective actions remain to be developed post-consent. iii. why the ExA can be satisfied that no significant effects on human receptors, ecological receptors or local air quality would arise if the proposed development is constructed in accordance with those secured measures. b) SNC and NCC**:** Confirm whether you are satisfied that the proposed dust and particulate matter control measures, monitoring arrangements, trigger levels and complaint procedures are sufficient to ensure effective management of dust emissions throughout construction and, if not, identify the additional provisions that should be secured.
Q2.2.2	The applicant	**Construction traffic emissions and cumulative effects** The applicant concludes within the Air Quality Assessment [APP-049] that construction and cumulative traffic-related air quality effects would not be significant, notwithstanding reported cumulative traffic increases exceeding screening criteria on sections of the A140. The ExA is seeking to understand the evidential basis for concluding that further quantitative assessment was not required. Explain: a) why quantitative dispersion modelling was not undertaken for construction traffic and cumulative traffic scenarios. b) the worst-case construction and cumulative traffic assumptions relied upon within the assessment, including HGV movements, workforce traffic and construction programme assumptions. c) how sensitive human and ecological receptors were considered within the assessment. d) why the ExA should conclude that construction and cumulative traffic emissions would not result in significant adverse effects on local air quality, human health or ecological effects.
3. Aviation		
Q2.3.1	a) and b) The applicant c) South Norfolk Council	**Consultation with Ministry of Defence (MoD) / Defence Infrastructure Organisation (DIO)** The applicant is requested to confirm whether consultation was undertaken with the MoD and/or the DIO in relation to the relationship of the proposed development with the East 2 WAM (Wide Area Multilateration) Network safeguarding direction. a) If such consultation was undertaken, please provide details of i) the timing and scope of the consultation, ii) the matters raised by the MoD and/or DIO and iii) how any comments received have been considered in the design, assessment and mitigation of the proposed development.

ExQ2	Question to:	Question:
		b) If no consultation was undertaken, please explain why the applicant considered consultation with the MoD and/or DIO to be unnecessary. c) Does SNC consider that MoD/DIO should be consulted under the safeguarding direction?
Q2.3.2	The applicant	**Engine-failure-after-take-off (EFATO) assessment methodology** The applicant's aviation assessment [REP1-083] adopts a 2km assessment distance and assesses potential emergency landing areas using both 60° and 90° sectors, whilst Norfolk Gliding Club (NGC) [REP1-403] dispute the appropriateness of these assumptions and their consistency with the Combined Aerodrome Safeguarding Team (CAST) Advice Note 5. Provide a technical note explaining: a) the basis for selecting a 2km assessment distance b) the basis for introducing a 60° assessment sector in addition to the 90° sector referred to by Norfolk Gliding Club c) whether any sensitivity testing was undertaken using greater assessment distances or alternative sector geometries d) why the applicant considers the adopted methodology represents a robust worst-case assessment of engine failure after take-off and forced landing risk associated with Tibenham Airfield
Q2.3.3	The applicant	**Emergency landing and EFATO assessment methodology** In response to ExQ1 the applicant states [REP1-083] that consultation undertaken by its aviation consultant with pilots and aerodrome operators informed a view that, in practice, a sector of 60 degrees (30 degrees either side of the extended runway centreline) may be appropriate when considering potential emergency landing areas. CAST Advice Note 5 refers to a 90-degree sector (45 degrees either side of the extended runway centreline). The applicant has subsequently assessed both sector widths within its analysis. a) Provide further details of the consultation relied upon to support the adoption of a 60-degree sector, including: i) the organisations, aerodromes and categories of pilots consulted ii) the date and purpose of the consultation iii) any written records, reports or technical outputs arising from that consultation iv) whether the consultation specifically considered glider operations, tug aircraft operations and powered aircraft operations comparable to those undertaken for Tibenham Airfield b) Explain the evidential and operational basis upon which a pilot experiencing an EFATO or glider launch failure event could reasonably be expected to limit their search for a suitable landing area to a 60-degree sector rather than the 90-degree sector referred to in CAST Advice Note 5. c) Identify if any recognised aviation guidance, published research, Civil Aviation Authority guidance, safety study or industry standard supports the use of a 60-degree sector in preference to, or alongside, the 90-degree sector described within CAST Advice Note 5. d) Explain whether the applicant's conclusions regarding the acceptability of aviation safety effects would change if assessment were undertaken solely on the basis of the 90-degree sector referred to in CAST Advice Note 5.
Q2.3.4	a) The applicant b) Norfolk Gliding Club	**Tibenham Airfield Runway 08 assessment** NGC [REP1-403] has submitted runway-specific evidence indicating that powered aircraft operating from Runway 08 may reach potential forced landing locations within the order limits and beyond the applicant's assessment area, resulting in continued disagreement regarding the adequacy of the EFATO assessment. a) Applicant: Provide a point-by-point response to NGC's Runway 08 assessment, including: i. comparison of modelling assumptions. ii. aircraft performance assumptions. iii. glide and climb gradients. iv. treatment of reduced-performance events. v. whether the applicant's conclusions would change if the assumptions advanced by NGC were adopted. b) NGC: Quantify the number of aircraft take-offs or landings on Runway 08, either as annual movements, daily movements, or percentages of total airfield activity.

ExQ2	Question to:	Question:
Q2.3.5	General Aviation Awareness Council (GAAC)	**Aviation risk assessment methodology and 'ALARP'** GAAC has submitted [REP1-401 & REP2-062] that the applicant has not demonstrated that aviation safety risks associated with the proposed development have been reduced as low as reasonably practicable (ALARP). It has referred to aviation safety management principles and risk-based assessment approaches in its written representation and comments on the applicant's response to ExQ1 [REP2-062]. a) Identify the specific legislation, policy, aviation guidance, aviation safeguarding framework, Civil Aviation Authority publication, safety management system guidance, or other recognised source which, in your view, establishes that an ALARP demonstration is required when assessing the effects of a solar development on aviation safety and aviation safeguarding interests. b) Explain how the ALARP principle should be applied in the circumstances of the proposed development, including the hazards to which it should apply and the criteria by which compliance should be assessed. c) Identify any examples from recent planning, infrastructure, aviation safeguarding or regulatory decision-making where an ALARP assessment has been required in relation to comparable aviation safeguarding effects arising from solar energy developments. d) If your position is that an ALARP assessment is required, please explain what additional analysis, evidence or mitigation the applicant would need to provide in order to demonstrate that aviation risks associated with the proposed development have been reduced to a level that would satisfy GAAC.
Q2.3.6	The applicant	**Emergency landing area availability** The applicant has quantified [APP-054, APP-222] the proportion of EFATO sectors occupied by the proposed development, while GAAC [REP1-116, REP2-062] and NGC [REP1-096, REP1-403, REP2-061] maintain that the presence of solar infrastructure, fencing, substations and BESS compounds may materially reduce the availability of emergency landing opportunities. Provide a plan-based assessment showing: a) the emergency landing areas currently available to powered aircraft and gliders. b) those areas that would remain available following construction of the proposed development. c) areas potentially affected by solar panels, fencing, substations, BESS compounds, pylons and other infrastructure. d) the basis for concluding that any reduction would not result in an unacceptable aviation safety consequence.
Q2.3.7	The applicant	**Collision consequences** GAAC has raised concerns [REP1-401, REP2-062] regarding the consequences of aircraft impact with project substations, BESS compounds, National Grid infrastructure and pylons, including potential risks to aircraft occupants and persons on the ground. Provide an assessment of: a) foreseeable aircraft collision scenarios involving project infrastructure. b) the potential consequences of collision with BESS compounds, substations and associated electrical infrastructure. c) whether such consequences have been considered within the applicant's aviation safety assessment. d) any mitigation measures relied upon to reduce these risks
Q2.3.8	The applicant	**Cumulative aviation effects** Stakeholders [REP1-401, REP1-403, REP2-062, REP2-061] submit that the assessment does not adequately address the cumulative effect of the proposed development in combination with Station Road Solar Farm, existing and proposed pylons, and other strategic electricity infrastructure in the vicinity of Tibenham Airfield. Provide an updated cumulative aviation safety assessment identifying: a) all relevant existing, consented and proposed infrastructure b) cumulative effects on emergency landing opportunities c) cumulative effects on aviation obstacle environments d) cumulative glint and glare effects e) whether the applicant's conclusions regarding aviation safety remain unchanged

ExQ2	Question to:	Question:
Q2.3.9	The applicant	**Glint and glare operational effects** The applicant's assessment [AS-025] identifies instances of yellow glare which are considered potentially manageable operationally, while NGC maintains [REP1-403] that the assessment does not adequately reflect actual glider, tug aircraft and circuit operations at Tibenham Airfield. Provide further justification for the conclusion that identified yellow glare effects would not result in significant operational impacts, including: a) how actual glider and tug aircraft operations were represented. b) whether all relevant circuit patterns and launch scenarios were assessed. c) the assumptions applied regarding pilot field of view and lookout requirements. d) whether any operational restrictions or mitigation measures would be necessary.
Q2.3.10	a) to d) General Aviation Awareness Council and Norfolk Gliding Club	**Outstanding areas of disagreement** The SoCG's [REP1-095, REP1-096] indicate that matters relating to aviation safety remain unresolved notwithstanding ongoing discussions with the applicant For each remaining matter of disagreement: a) identify the specific evidence which is currently absent. b) explain whether provision of that evidence could resolve the disagreement. c) identify any mitigation measures that would be capable of rendering the residual aviation risk acceptable. d) confirm whether the concern relates to methodology, assessment conclusions, mitigation, or residual risk acceptance.
Q2.3.11	a) to d) General Aviation Awareness Council and Norfolk Gliding Club	**Acceptability of residual risk** The applicant concludes [PDA-006] that aviation effects would not be significant, whereas stakeholders [REP1-098, REP1-401, REP1-403] maintain that residual aviation safety risks remain insufficiently assessed Should the applicant's current mitigation package be implemented in full, identify: a) the residual aviation risks considered unacceptable. b) the basis upon which those risks are considered unacceptable. c) any recognised aviation guidance, safety management principles or risk assessment methodologies supporting that conclusion; and d) the additional measures required for the residual risk to become acceptable.
4. Climate change		
Q2.4.1	The applicant	**Resilience to extreme weather** With reference to paragraph 4.10.11 of NPS EN-1, can you provide further explanation of how the proposed development would be resilient to the effects of climate change, particularly in relation to higher temperatures and high winds? In particular can you address elements of the scheme such as the tracker motors and solar panels which do not appear to have been clearly considered in tables 6.36, 6.37 and 6.38 of ES chapter 6 and explain how the proposed development could be adapted over its lifetime to remain resilient to climate change?
Q2.4.2	The applicant	**Whole life greenhouse gas (GHG) assessment** BEPS sensitivity testing of future decarbonisation of the grid indicates that applying a declining grid carbon intensity could change the calculated lifecycle emissions associated with the scheme. Can you explain whether the conclusion of a significant beneficial GHG effect reported in ES chapter 6, based on a fixed 2031 grid carbon intensity, would change under the alternative scenarios, whether these scenarios should be taken into account and whether this would affect the conclusions in the ES?
Q2.4.3	The applicant	**Emissions from water-tankering** Can you clarify whether the tankering of water supplies to site during construction, operation and decommissioning was included within the GHG assessment, and if not quantify any additional emissions and explain whether this would alter the emissions stated and the conclusions of the assessment?

ExQ2	Question to:	Question:
5.	**Compulsory acquisition and other land rights**	
Q2.5.1	The applicant	**Outstanding negotiations** The applicant's response to ExQ1.7.1 states that negotiations remain ongoing with 27 affected parties and that 18 interests have not yet been issued for negotiation. For each affected interest identified within these categories, provide a schedule setting out: a) plot number(s) b) landowner and affected party (where publication is permissible) c) nature of the land interest d) nature of the rights sought e) date of first contact f) current negotiation status g) principal issues preventing agreement h) anticipated timescale for either completion of negotiations or confirmation that agreement cannot be reached The schedule should distinguish between negotiations that are active, dormant, awaiting information from the applicant, awaiting information from the landowner, and where no response has been received.
Q2.5.2	The applicant	**Category 3 assessment** The applicant's Statement of Reasons [APP-020] explains that Category 3 persons comprise those who may be eligible to make a claim for compensation arising from the construction or operation of the proposed development, and a number of interested parties contend that they should have been included within Part 2 of the Book of Reference but have not been identified as such. These concerns are raised in, amongst others, [RR-1611], [RR-1256], [REP2-045] and [REP2-060]. a) For each property and individual who has requested inclusion within Part 2 of the Book of Reference as a Category 3 person provide a schedule setting out: i. the property assessed ii. the individual assessed iii. the potential basis on which that person could claim compensation, including consideration of section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 and section 152(3) of the Planning Act 2008 where relevant iv. the evidence considered by the applicant, including proximity to the proposed development and any predicted construction or operational effects v. the assessment undertaken to determine whether that person would or might be entitled to make a relevant claim vi. the reason why that person was included or excluded from Part 2 of the Book of Reference b) Confirm whether the assessments referred to above have been revisited in light of the representations made during the examination, including those contained within [RR-1611], [RR-1256], [REP2-045] and [REP2-060]. If so, identify the outcome of that review. c) If the applicant maintains that any of the above individuals should not be included within Part 2 of the Book of Reference, provide a reasoned property-specific justification demonstrating why the applicant considers that the relevant statutory Category 3 threshold is not met.
Q2.5.3	The applicant	**Interests not yet issued for negotiation** The applicant's response to ExQ1.7.1 states that 18 interests have not yet been issued for negotiation because ownership and/or the rights required remain under review. For each such interest: a) explain why ownership has not yet been confirmed and/or why the rights required remain uncertain b) identify the specific rights that may be required c) explain how the applicant has concluded that the inclusion of these plots within the order limits is presently justified d) state when negotiations are expected to commence

ExQ2	Question to:	Question:
		e) explain how the applicant considers the inclusion of such interests satisfies the tests of necessity and proportionality
Q2.5.4	The applicant	**Necessity of rights sought** For each category of rights identified in the Book of Reference and Statement of Reasons, provide a justification schedule identifying: a) the right sought b) the purpose for which the right is required c) whether the right is required during construction, operation, maintenance or decommissioning d) why the right cannot be reduced in extent e) why acquisition of a lesser right would not be sufficient Where standard rights wording has been used across multiple plots, explain how plot-specific necessity has been assessed.
Q2.5.5	The applicant	**Temporary possession** For all land subject to temporary possession powers: a) explain why permanent acquisition is not proposed. b) explain why temporary possession is required. c) state the anticipated duration of temporary possession. d) explain how the extent of temporary possession land has been minimised. e) identify all plots where temporary possession powers could be removed without affecting deliverability of the proposed development.
Q2.5.6	The applicant	**Cable corridor widths and rights** Several affected persons contend that the width of proposed cable corridors and associated rights exceeds what is reasonably required. Provide: a) the engineering basis for the width of each cable corridor. b) the minimum construction width required. c) the minimum operational easement width required. d) any corridor width sensitivity testing undertaken. e) any alternative alignments or reduced-width solutions considered. f) an explanation of why the rights sought represent the minimum land take required.
Q2.5.7	The applicant	**Alternatives to compulsory acquisition** Provide a summary of the alternatives considered to compulsory acquisition and the acquisition of rights, and explain why each alternative was discounted, including: a) alternative siting; b) alternative routing of cable infrastructure; c) alternative access arrangements; d) alternative drainage solutions; e) alternative rights packages; and f) alternative temporary possession arrangements. For each alternative, identify the principal technical, environmental, operational, commercial, land ownership or other factors that led to it being discounted in favour of the proposed approach.
Q2.5.8	The applicant	**Human rights and proportionality** The applicant's response to ExQ1.7.1 confirms that a number of interests remain either under negotiation or have not yet entered negotiation. Explain: a) how Article 1 of the First Protocol has been considered in respect of those interests. b) how the applicant has ensured that interference with private property rights has been minimised.

ExQ2	Question to:	Question:
		c) why compulsory powers are presently proportionate where negotiations have not commenced. d) what further steps the applicant intends to take to secure voluntary agreement. e) whether any plots are presently included within the Order Limits on a precautionary basis pending further design development.
Q2.5.9	The applicant	**Agricultural holdings and land management** Several relevant representations (RRs) raise concerns regarding agricultural operations, severance and farm viability. For each affected agricultural holding: a) identify temporary and permanent land take. b) explain how severance has been assessed. c) explain how access to retained land would be maintained. d) explain how drainage and irrigation systems would be protected. e) explain whether any holding would become less viable as a result of the proposed development. f) identify any mitigation secured through negotiation.
Q2.5.10	The applicant	**Statutory undertakers and apparatus** Provide an update on discussions with statutory undertakers and utility operators whose apparatus may be affected by the proposed development. The response should identify for each undertaker: a) remaining areas of disagreement. b) protective provisions not yet agreed. c) apparatus potentially affected by compulsory acquisition or temporary possession powers. d) any outstanding concerns regarding serious detriment. e) the applicant's proposed route to resolution.
Q2.5.11	The applicant	**Updated negotiation schedule** At deadline 3, provide an updated version of the Land and Rights Negotiation Tracker that: a) identifies all agreements completed since submission of [APP-023]. b) identifies all agreed Heads of Terms. c) identifies all ongoing negotiations. d) identifies all interests not yet subject to negotiation. e) explains all material changes since deadline 1. f) highlights any interests where compulsory acquisition powers are now no longer required.
6. Cultural heritage		
Q2.6.1	The applicant	**Schedule of heritage assets** In response to ExQ1.8.2 the applicant has submitted its schedule of heritage assets [appendix B of REP1-083]. The ExA requests that this schedule is resubmitted as a standalone document at deadline 3 with updates to include each designated heritage asset that has been referred to in written representations at deadline 1. It also needs to include the examination library reference of each relevant submission made by any interested party.
Q2.6.2	The applicant	**Duration of heritage impact** Paragraph 10.5.11 of chapter 10 of the ES [APP-046] identifies duration as one of the factors to be taken into account in considering the magnitude of impact. The proposed development has an anticipated operational life of up to 60 years: a) Explain in further detail how duration has been considered in the assessment of cultural heritage? b) Would there be any difference between effects assessed over a 60 year operational period and those assessed on a permanent basis? c) How have heritage impacts over a shorter temporary period, such as those arising from construction works, been considered?

ExQ2	Question to:	Question:
Q2.6.3	The applicant	**Setting of heritage assets** Noting the comments in Historic England's written representation [REP1-186] along with Historic England's Good Practice Advice 'The setting of heritage assets', explain why it appears that visibility has been considered as such a determining factor in the applicant's assessments of effects upon setting and significance, rather than matters such as historic association.
Q2.6.4	The applicant	**Application of mitigation hierarchy** Explain more specifically how the mitigation hierarchy has been applied in relation to effects upon designated heritage assets, bearing in mind the great weight that should be given to their conservation. Step 4 of Historic England's Good Practice Advice (referred to above) is to explore ways to maximise enhancement and avoid or minimise harm. Bearing in mind the overall scale of the scheme dispersed across a wide area, why has it not been possible to avoid harm to certain heritage assets where, even in the applicant's assessment, residual adverse effects would result?
Q2.6.5	a) and c) The applicant b) South Norfolk Council and Historic England	**Application of the heritage balance** The National Planning Policy Framework (NPPF) (September 2026) requires (HE6) that harm to the significance of a designated heritage asset should be weighed against any public benefits resulting from the proposal. It also makes clear that any harm to a designated heritage asset will be a matter of considerable importance and weight. NPS EN-1 contains similar provisions (with reference to 'less than substantial harm'). a) For the avoidance of doubt, can the applicant clarify how it has carried out this balancing exercise. In particular, should the harm for each individual designated heritage asset be separately weighed against the public benefits of the proposal in carrying out the balancing test? Or should the combined overall harm resulting to all designated heritage assets be weighed against the public benefits? b) How does Historic England and SNC consider that the balancing exercise should be carried out? c) How has the applicant considered situations where it expects that residual 'little' or 'negligible' harm would result. How have these been factored into its overall assessment, bearing in mind that any harm to a designated heritage asset will be a matter of considerable importance and weight?
Q2.6.6	The applicant	**Saxlingham Nethergate Conservation Area** Paragraph 1.5.28 of the Preliminary Arboricultural Impact Assessment (PAIA) [APP-150] states that no tree works in the respect to conservation area trees are identified in the PAIA. However, paragraph 10.8.24 of chapter 10 of the ES (Cultural Heritage) [APP-046] explains that swept path analysis of the Abnormal Indivisible Load (AIL) route may lead to a load potentially oversailing, leading to the possibility that tree canopies within the conservation area may need to be trimmed back. Paragraphs 8.19 and 8.20 of NCC's LIR [REP1-211] raise issues regarding the tracking of AILs with particular concerns expressed regarding The Street and Church Hill, including historic features along them. a) Using a topographical survey with AIL tracking details, demonstrate that AIL routes are physically viable along The Street and Church Hill, including the location of tree canopies. b) Using topographical survey information, identify on a drawing where tree canopy and hedge trimming might possibly be required, including the trees that would be affected and maximum potential extent of required trimming. c) What assessment has been carried out of the likely impacts of such works based on worst case scenario, taking account of the contribution of any affected tree on the character and appearance of the conservation area and any works that might affect the setting of any listed building. d) What approval mechanism is there within the dDCO for proposed works to trees in conservation areas? e) Noting SNC concerns in its LIR [REP1-213] would any landscaping removal be required within the setting of the Grade II* Saxlingham Rectory? If it would be required, what would be the effects upon its significance?
Q2.6.7	The applicant	**Church of St Mary (Grade II*) and Shotesham Conservation Area** In its written representation [REP1-186], Historic England expresses concern that these heritage assets have been scoped out of detailed assessment. It is noted that the applicant intends to address this in more detail in the SoCG. Set out the extent to which the wider rural and valley landscape contributes to the setting and significance of these assets, including relevant historic and spatial relationships and subsequently provide an assessment of any effects of the proposed development upon their significance.

ExQ2	Question to:	Question:
Q2.6.8	The applicant	**Fairstead Lane** The BEPS written representation submission [REP1-394] refers to the potential effects from road widening, verge alteration and hedgerow loss along Fairstead Lane on the setting of nearby heritage assets. a) Drawings, using topographical surveys, are requested of the proposed works that are likely on Fairstead Lane. b) Provide an assessment of these works (based on the worst-case scenario) on the setting and significance of the nearby heritage assets.
Q2.6.9	a), c), d) The applicant b), c), d) Norfolk County Council	**Traffic vibration effects on listed buildings** In response to NCC's concerns regarding vibration and potential need for condition surveys set out in paragraphs 8.22 and 8.27 of its LIR [REP1-211], the applicant explains that construction vehicle routing has been developed with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, where practicable. Therefore, it says that construction surveys of listed buildings are not required as there will be no direct impacts through vibration. a) Can the applicant explain what measures would be put in place, including surveys, where it is not possible for construction vehicle routing to avoid sensitive heritage assets and the routing of vehicles through local villages? b) Can NCC refer to any particular locations, where it considers there may be a particular risk of adverse effects from vibration on historic buildings, along with any evidence to support such concerns? c) Are there any locations on HGV construction routes where listed buildings are located under 10m from the road? In these cases what would the risk be of adverse effects from vibration? d) NCC refers to the Sizewell C DCO where a requirement was included relating to potential pre-construction survey. Are there similarities between that case and this application, including with regard to the number of HGV vehicles on particular construction routes?
Q2.6.10	The applicant	**Heritage assessment and design parameters** Explain in further detail and with examples, how each work component, based upon the maximum design parameters, have been used in the assessment of the effects of the proposed development upon designated heritage assets. This should include reference to the following elements of the scheme, including the combined effects of different works upon designated heritage assets: a) Solar PV modules etc and switch rooms, conversion units etc (Work No.1). b) BESS enclosure (Work No.2) c) 400kV and 132 kV substations (Work No.3) d) National Grid substation (Work No.4) e) Works in connection with existing overhead electric line (Work No.5) f) Works including fencing, security and monitoring measures etc (Work No.7)
Q2.6.11	The applicant	**Landscape planting** In some instances, landscape screening is proposed as heritage mitigation. Explain in further detail the consideration that has been given to the effects of proposed screening on the significance of designated heritage assets, including with regard to landscape character, openness, existing views along with spatial and functional relationships between heritage assets and their surroundings?
Q2.6.12	The applicant	**Conclusions reliant on planting mitigation** Notwithstanding the question above, set out in a list any designated heritage assets where the applicant's assessment finds that harm (including non-significant harm) would occur in the absence of proposed planting mitigation. Given the time taken for planting to mature to the level where mitigation would be effective, where there is any temporary harm, should this be included in the overall heritage conclusions and considered in the heritage balancing exercise?
Q2.6.13	The applicant Historic England Norfolk County Council	**Archaeology and Solar Farms – Good Practice Guide** Historic England published its Archaeology and Solar Farms – Good Practice Guide in April 2026 which sets out good practice to promote consistent approaches to the process and timing of archaeological work on large-scale solar farms. Drawing on the applicant's approach to archaeology and the representations made by HE [REP1-186] and NCC in its LIR [REP1-211], each party is requested to comment on how the proposed development accords with this good practice guidance?

ExQ2	Question to:	Question:
Q2.6.14	The applicant	**Further geophysical surveys** The applicant notes that geophysical survey work across the cable route corridor is on-going. Provide an update on the extent and timing of this survey work, the implications of it and how and when it will be reported to the examination.
Q2.6.15	The applicant	**Joint bays** The proposed joint bays would be up to 20 metres (m) long, 7m wide and 3m deep as set out in the Design Principles, Parameters and Commitments [REP1-078]. Cross referencing to relevant sections of the ES documents, how have the effects of the joint bays on below ground archaeology been assessed in the ES?
Q2.6.16	Historic England Norfolk County Council	**Trial trenching** Should any further trial trenching take place prior to the grant of any development consent or are you satisfied that it can be secured through the dDCO for the post consent / pre-construction phase. Explain your position in either case.
Q2.6.17	a) to c) South Norfolk Council d) The applicant	**Non-designated heritage assets** Paragraph 2.3 of SNC's LIR [REP1-213] includes reference to the applicant not identifying historic paths and routes as non-designated heritage assets and goes on to consider them as important components of the historic agricultural landscape which would be cumulatively affected by the different elements of the proposed development. a) SNC is asked to explain further its basis for including historic paths and routes as non-designated heritage assets, taking account of the relevant Planning Practice Guidance (Paragraph: 039 Reference ID: 18-039-20190723). b) Confirm which historic paths and routes SNC is referring to and provide details and evidence of where and why these have been identified by SNC as 'plan-making body' as non-designated heritage assets. c) For the avoidance of doubt, is the Council objecting to specific/cumulative effects on each non-designated heritage asset. If so, further explanation of this would be helpful including the historic significance of each and the effects of the proposed development upon this significance. Or if the argument in paragraph 2.3 of the LIR is based upon the effects on historic landscape character, then further explanation of this would be helpful, noting Historic England's publication 'Historic Landscape Characterisation'. d) The applicant may also wish to comment on these matters, which should also be addressed in the SoCG between the parties.
Q2.6.18	The applicant	**Cumulative effects** In its written representation [REP1-186] Historic England notes the importance of considering 'non-significant' heritage effects in the assessment of cumulative effects, including but not limited to the Grade I Church of St Michael. It is noted that, in response, the applicant states that it will address this in more detail in its SoCG with Historic England. The applicant is requested to also update its cumulative assessment to consider the combined changes to the setting and significance of heritage assets arising from the relevant developments, taking account of all heritage harm rather than just harm that is 'non-significant' in EIA terms.
7. Draft Development Consent Order (DCO)		
Q2.7.1	The applicant	**Recently made DCOs for solar projects** Several DCOs have been recently made by the Secretary of State for Energy Security and Net Zero (SoS) for solar schemes. In order to provide consistency between DCO's (whilst recognising that there may need to be some variation in drafting depending on the particular circumstances of each made order) the applicant is requested to review all recently made solar orders and, where appropriate, amend the dDCO [REP1-014] in order to provide for consistency on approach and drafting. Where proposed drafting is materially different to that used by the SoS in recently made DCOs, justification should be provided for this within an updated explanatory memorandum.
Q2.7.2	The applicant	**Order preamble** Should the final paragraph of the dDCO preamble include reference to section 140 of the Planning Act 2008 as the proposed development involves the construction of a generating station?
Q2.7.3	The applicant	**Contents page** The applicant is requested to ensure that future submitted versions of the dDCO includes page numbering and that the contents page includes the page number for each item. This is to help with ease of navigation of the dDCO document.

ExQ2	Question to:	Question:
7.1	**Articles**	
Q2.7.4	The applicant	**Article 2(1) (Interpretation)** In relation to '*applicable period*': The applicant's response to ExQ1.9.1 [REP1-083] discusses its approach to the 'applicable period' and its use in Requirement 2 (Commencement of the proposed development). In this context, the ExA also notes the recently made Green Hill Solar Farm order (granted on 8 October 2026). a) With reference to the Green Hill Solar Farm order should the definition of 'applicable period' be amended so that the five-year period runs from the date the order is made, rather than the date it comes into force? b) In making the Green Hill Solar Farm order, the SoS amended requirement 2 (commencement of the authorised development) to fix the commencement deadline at five years from the date the DCO comes into force to ensure a definite commencement period. Should a similar amendment be made to the dDCO?
Q2.7.5	The applicant	**Article 2(1) (Interpretation)** In relation to '*authorised development*': The ExA notes that the additional wording '*and any other development authorised by this Order*' used in the definition is not universally included in recently made DCOs (for example the Steeple Renewables Project order). The applicant's response to ExQ1.9.2 [REP1-083] is not entirely persuasive. It indicates that certain powers within the DCO may overlap with section 32 of the Planning Act 2008 and, in that case, it is important for those works to fall within the scope of the definition of authorised development to ensure that such works will be controlled by requirements. a) Whilst noting article 3 (Development consent etc. granted by this Order), it is not clear why all the authorised development cannot simply be included in Schedule 1 (Authorised development) therefore making the additional wording referred to above redundant. Can the applicant explain further? b) Explain why it is considered necessary in this case given that it has not been included in some recently made solar orders such as One Earth Solar and the Steeple Renewables Project.
Q2.7.6	a) and b) The applicant a) Norfolk County Council and South Norfolk Council	**Article 2(1) (Interpretation)** In relation to '*maintain*': It is noted that in making the recent Green Hill Solar order the SoS amended the definition of 'maintain' to make clear that the power to maintain the authorised development does not extend to the removal, reconstruction or replacement of the whole of the authorised development. Similar wording is also used in other recently made DCOs. a) Should this amendment to the drafting also be made in this case. If not, why would such drafting not be applicable to the proposed development when it has been used in other recently made orders? b) In its response to ExQ1.9.3 the applicant explains that section 2.12 of the Outline Operational Environmental Management Plan (oOEMP) [REP2-012] sets out that some components of the scheme are 'not anticipated' to be replaced during the operation phase. As such, it says that any final plan must be substantially in accordance with that provision. Can the applicant explain how the use of the words 'not anticipated' and 'substantially' create the necessary clarity and precision in this context?
Q2.7.7	The applicant	**Article 2(1) (Interpretation)** In relation to **'***permitted preliminary works':* The draft DCO submitted at deadline 1 [REP1-014] includes the addition of 'protection' of apparatus. No specific justification has been provided for this, other than it has also been included in the draft DCO for Lime Down Solar Park project. This proposed wording was not accepted by the SoS in the recently made Green Hill Solar Farm Project order as it would an expansion of the scope of these works, that is inconsistent with previously made orders. The applicant is therefore requested to remove this from the dDCO as no reasonable justification has been provided for it and it has not been accepted by the SoS in a recently made order.
Q2.7.8	The applicant	**Article 2(10) (Interpretation)** Similar provisions to article 2(10) have been removed in recently made orders including the Green Hill order and the Frodsham Solar order. Re-consider whether article 2(10) is necessary.

ExQ2	Question to:	Question:
Q2.7.9	The applicant	**Article 5 (Power to maintain the authorised development)** In line with recent precedent, should the drafting 'except to the extent that this Order or an agreement made under this Order provides otherwise' be added to article 5(1)?
Q2.7.10	South Norfolk Council	**Article 7 (Defence to proceedings in respect of statutory nuisance)** In paragraph 8.3.2 of its LIR [REP1-213] SNC considers that where mitigation measures are relied upon to reduce identified adverse effects, the DCO should secure clear, outcome-based obligations rather than relying solely upon the submission of management plans for future approval. SNC is requested to provide specific details of those particular measures where clear and outcome-based obligations should be secured by the DCO to satisfy its concerns regarding this article.
Q2.7.11	The applicant Norfolk County Council	**Articles 8,10 and 14 (Traffic and streets etc)** Paragraph 8.28 of NCC's LIR [REP1-211] states that the powers in articles 8, 10 and 14 would represent an intolerable imposition of risk onto the county council. In response, the applicant says that it will engage with the local highway authority regarding the inclusion of protective provisions for the benefit of the local highway authority. Can both parties provide an update on the current position on this matter, setting out any remaining areas of disagreement and the reasons for any such disagreement.
Q2.7.12	Norfolk County Council	**Article 11 (Construction and maintenance of altered streets)** In its post hearing submission [REP1-233], NCC explains that it is taking further legal advice on the effects and implications of article 11. Can NCC provide an update on its latest position regarding this article, including any suggested drafting changes to resolve any concerns?
Q2.7.13	The applicant Norfolk County Council	**Article 12 (Temporary closure of streets and public rights of way)** In its post hearing submission [REP1-233], NCC seeks clarification on the term 'reasonable time' that is used in the drafting of this article. Can both parties provide an update on the current position on this matter, including any remaining disagreement that may remain, the reasons for such disagreement and any suggested alternative drafting?
Q2.7.14	The applicant	**Article 13 (Use of private roads)** In response to ExQ1.9.6 [REP1-083] the applicant has a plan showing the location of private roads within the order limits but does not consider a separate definition, reference to any plan or schedule is necessary. a) Given that this is not a widely precedented article, what are the specific circumstances in this case that justify its inclusion given that it has not been included in several other recently made solar DCO's? b) As there may be some ambiguity as to what a private road is, provide a mechanism or other appropriate drafting within the dDCO to remove any doubt as to what constitutes a private road. For example, making it clear that it does not include a long private driveway or access track. The use of a schedule or reference to a certified 'private road plan' may achieve this.
Q2.7.15	The applicant	**Article 16 (Traffic regulation measures)** Noting recent precedent, should article 16(5) include provision for 'displaying a site notice containing the same information at each end of the length of the road affected' or similar drafting?
Q2.7.16	a) The applicant b) Historic England and Norfolk County Council	**Article 18 (Removal of human remains)** The applicant's response to ExQ1.11.6 [REP1-083] explains that irrespective of whether the applicant is aware of any burial grounds at this stage, there is always a chance of encountering burials from the prehistoric period through to the early medieval periods, especially across a landscape of this scale. Nevertheless, the SoS is now routinely removing this article in recently made orders, including other large scale schemes. In the recently made Sea Link Project order, a similar article was removed by the SoS as it was not considered necessary or appropriate due to the separate statutory requirements, consistent with previous orders where there are no known human remains within the boundary of the authorised development. a) In the light of recent made Orders, the ExA considers a stronger justification would be necessary than that provided. The applicant is asked to re-consider this. b) The comments of Historic England and NCC are also invited on whether it is necessary for this article to remain in the dDCO.

ExQ2	Question to:	Question:
Q2.7.17	The applicant	**Article 20 (Authority to survey and investigate the land)** Should this article be amended to add that where the undertaker proposes to serve notice of entry under this article, the notice must include details of any proposed searching, boring or excavating, the leaving of apparatus on the land, and the taking of samples, or similar drafting?
Q2.7.18	The applicant	**Article 21 (Compulsory acquisition of land)** a) Provide specific justification for the inclusion of article 21(b) including for why the drafting extends to 'or for any other purposes in connection with or ancillary to the authorised development', noting that article 21(b) is not routinely used in several recently made DCOs. b) Should article 21(2) be extended to include reference to article 25 (Private rights), article 29 (Acquisition of subsoil only), article 33 (Statutory undertakers) and article 49 (Crown rights) and any other relevant articles in line with the drafting of the equivalent article in recently made orders?
Q2.7.19	The applicant	**Article 31 (Temporary use of land for constructing the authorised development)** Notwithstanding the applicant's response to ExQ1.9.9 [REP1-083] noting the most recent precedents, should the minimum notice period required before entering on and taking temporary possession of land be increased from 14 to 28 days, for consistency with the equivalent notice periods used elsewhere in the DCO?
Q2.7.20	The applicant	**Article 41 (Trees subject to tree preservation orders)** Tree preservation order is not defined. The ExA suggests adding further drafting to this article stating in an additional paragraph that 'In this article "tree preservation order" has the same meaning as in section 198 (power to make tree preservation orders) of the 1990 Act.'
7.2 Schedule 1 – Authorised development		
Q2.7.21	The applicant	**Definitions** Drawing on the drafting in recently made solar DCOs, review the list of definitions in paragraph 1 of schedule 1 to consider whether further definitions of terms used in paragraph 2 of schedule 1 are required. This should include, as a minimum, definitions for 'DC electrical cabling', 'combiner DC boxes', 'electrical cabling' and 'communications cabling'.
Q2.7.22	The applicant	**Decommissioning** Explain further how decommissioning works are captured within schedule 1.
Q2.7.23	The applicant	**Further associated development** For the avoidance of doubt, should the final paragraph (after (a) to (q)) include the proviso 'but only within the order limits' following the words 'of the authorised development'?
7.3 Schedule 2 - Requirements		
Q2.7.24	a) and b) The applicant, South Norfolk Council, Norfolk County Council b) Block East Pye Solar	**Requirement 2 (Commencement of the authorised development) – Construction phasing details** Requirement 2(1) and (2) [REP1-014] requires the submission of a written scheme setting out the phase or phases of construction of the authorised development including a timetable for the construction of the phase or phases and a plan identifying the phasing areas. a) Bearing in mind the uncertainties of the construction programme including the implementation of the proposed National Grid substation, should requirement 2(1) also include the need for the written scheme to be approved by the relevant planning authority as being just submitted to it (noting that similar provision has been included in the recent One Earth Solar order)? Include justification for your answer. b) Does this requirement also need provision for the development to be carried out in accordance with the submitted/approved written scheme? If not, how would the details be enforced?
Q2.7.25	The applicant	**Requirement 2 (Commencement of the authorised development) – Commencement period** As currently drafted, the requirement [REP1-014] appears to leave open the possibility that parts of the scheme may not be commenced until a significant time period after five years of first commencement, potentially increasing the period over which construction works are carried out and over which the effects are experienced. a) Why has the requirement been drafted in this way, particularly given the urgent need expressed elsewhere for renewable energy? b) How does the ES consider the effects from construction over a longer period than envisaged in the scheme description?

ExQ2	Question to:	Question:
		c) What measures can be introduced to ensure that the construction of different parts of the proposed development and not unreasonably delayed beyond the applicable period?
Q2.7.26	The applicant	**Requirement 3 (Approved details and amendments to them)** This requirement includes provision for amendments to all 'approved documents, plans, details or schemes' as well as those approved pursuant to any requirement. The ExA notes the precedent for this requirement in other orders but asks for clarification on how this requirement accords with the Government's Guidance on Changes to Development Consent Orders December 2015 and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 as amended in 2015.
Q2.7.27	a) to c) The applicant c) South Norfolk Council	**Requirement 5 (Detailed design approval)** Requirement 5 has been updated [REP1-014] to now include that details of Work Nos. 1, 2, 3 and 4 are submitted to and approved by the relevant planning authority. The applicant has also responded to ExQ1.9.4 [REP1-083] regarding the controls for the other works that would be authorised by the DCO. a) For the clarity and avoidance of doubt, provide a schedule detailing and signposting how each component part of each Work No. would be controlled through the dDCO. b) Works No. 5 (overhead transmission electric line) and works No.6 (works in connection with electrical cabling) are clearly fundamental parts of the scheme with potential environmental implications. Given the overall flexibility contained within the design principles, parameters and commitments [REP1-078] what confidence would the SoS have that these works would be designed to minimise any adverse effects arising from them. c) Provide an update on discussions taking place regarding this requirement, along with wider discussions on the detailed drafting of the design principles, parameters and commitments document.
Q2.7.28	The applicant	**Requirement 9 (Biodiversity net gain)** Recent decisions for Steeple Renewables Project Order (2026) and the Green Hill Solar Farm Order (2026) explicitly refer to 'using the Department for Environment, Food and Rural Affairs' 4.0 metric to calculate the percentages (or such other biodiversity metric agreed with the relevant planning authority in consultation with the relevant statutory nature conservation body)'. Can you provide comment on whether this wording should be expressly referred to in requirement 9? If not, why not?
Q2.7.29	Norfolk County Council	**Requirement 13 (Construction environmental management plan (CEMP) – Surface water drainage provision** In response to paragraph 9.25 of NCC's LIR seeking a construction surface water drainage strategy to be secured through the DCO, the applicant [REP2-022] explains that drainage requirements for the construction phase will be secured and prepared under the oCEMP. Is NCC satisfied that appropriate provision is made within the oCEMP for the provision of construction surface water drainage? If not, what further drafting or mechanism would be required?
Q2.7.30	The applicant	**Requirement 14 (Operational Environmental Management Plan)** Part 2 of requirement 14 refers to the construction environmental management plan, does this need to be amended?
Q2.7.31	The applicant, South Norfolk Council	**Requirement 19 (Skills, supply chain and employment)** As set out in the LIR's from NCC [REP1-211] and Suffolk County Council [REP1-212], should both parties be included as named consultees within the requirement? If not, explain why not and what comfort can be given to their involvement in the approval process without this inclusion?
Q2.7.32	a) and b) The applicant b) South Norfolk Council, Norfolk County Council and Block East Pye Solar	**Requirement 21 (Decommissioning and restoration)** The drafting of requirement 21 requires that the date of decommissioning for each part of Work No.1 must be no later than 60 years following the date of final commissioning for that part and with respect to non-permanent associated development must be no later than the date of decommissioning for the part of Work No.1 to which such associated development relates etc. a) To what extent may this lead to the possibility of the scheme as a whole (albeit different parts) being in existence for over 60 years, notwithstanding that each part would be in existence for up to 60 years? b) For precision and certainty, would it be preferable for the relevant drafting of this requirement to provide that the date of decommissioning for each part of the authorised development must be no later than 60 years following the date of final commissioning for the scheme as a whole (rather than each part)?

ExQ2	Question to:	Question:
7.4	**Schedule 14 – Protective provisions**	
Q2.7.33	The applicant Any party subject to protective provisions in Schedule 14	**General negotiation of protective provisions** Provide an update on the progress being made including engagement and negotiation of each set of protective provisions, setting out any areas of disagreement that remain for each and how resolution is being sought for such disagreements.
Q2.7.34	The applicant National Grid Electricity Transmission plc	**National Grid Electricity Transmission plc (NGET)** The ExA notes that protective provisions are yet to be agreed between the applicant and NGET. The SoCG between the two parties to be submitted at deadline 3 should include a full break down of any remaining matters of disagreement on the drafting of protective provisions, including reasons for any point of disagreement, suggestions for how any disagreement could be resolved and the timescale for such resolution.
Q2.7.35	a) to d) The applicant and National Gas Transmission plc	**National Gas Transmission (NGT) plc** a) Explain why there has not been significant progress on outstanding matters, bearing in mind the need to prioritise front-loading to resolve (as far as possible) key issues before submission of the application (paragraph 3.4 of the *Government Guidance on preparing an application: Part 1 – Pre-application steps*). b) Provide details of a programme of ongoing engagement to seek to ensure that matters relating to protective provisions are finalised prior to the end of the examination. c) In its response to NGT's written representation [REP1-398] the applicant makes numerous references to the Lime Down solar project. Are there any material differences between the two projects that merit a different approach to the drafting of protective provisions? d) The SoCG between the two parties to be submitted at deadline 3 should include a full break down of any remaining matters of disagreement on the drafting of protective provisions, including reasons for any point of disagreement, suggestions for how any disagreement could be resolved and the timescale for such resolution.
Q2.7.36	a) and b) National Gas Transmission plc b) The applicant	**National Gas Transmission (NGT) plc** NGT's written representation [REP1-398] seeks specific electrical impact assessments to fully evaluate the risks posed by the project. The applicant responded at deadline 2 [REP2-021] that this will be discussed through the SoCG process. a) NGT is asked to explain at what point it would expect such assessments to be carried out and its full justification for this. As appropriate, reference may also be made to similar requirements on other national infrastructure projects where this issue has arisen. b) The SoCG between the parties to be submitted at deadline 3 is required to provide a full update on this matter, including any remaining points of disagreement, justification for any point of disagreement, how it is suggested that any disagreement could be resolved and a timetable for this.
7.5	**Schedule 15 – Procedure for discharge of requirements**	
Q2.7.37	South Norfolk Council	SNC is requested to set out any remaining issues it may have with the drafting of Schedule 15.
Q2.7.38	a) and b) The applicant and South Norfolk Council	Paragraph 2(4) of the Schedule 15 (Procedure for discharge of requirements) states that the applicant, when applying to discharge a requirement, must provide the relevant planning authority with a statement confirming whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement and if it will then it must be accompanied by information setting out what those effects are. a) Given that the scheme and environmental statement would already have been assessed as approved, explain why it may be permissible for details submitted for approval under the requirements to give rise to any materially new or materially different environmental effects beyond those already reported in the environmental statement as assessed by the SoS? b) In these circumstances, how would there be fairness and transparency for those persons potentially with an interest in the proposed submission (e.g. residents living in proximity of a particular part of the scheme subject to the submission)?

ExQ2	Question to:	Question:
8. Ecology, biodiversity and Habitats Regulations Assessment		
Habitats Regulations Assessment (HRA)		
Q2.8.1	The applicant Natural England	**Annex A – Applicant and Statutory Nature Conservation Body position summary table** The ExA draws the applicant and NE's attention to the position summary set out in annex A of this document. The ExA notes that there are no areas of disagreement, however, can you review the summary table and confirm whether you agree with the stated position or make any amendment through tracked changes to the Microsoft word version and provide any explanation for your position.
Ecology and biodiversity		
Q2.8.2	a. to e) The applicant f) Norfolk County Council, South Norfolk Council, Natural England and Norfolk Wildlife Trust	**Skylark mitigation strategy** ES chapter 8 [APP-044] concludes that operational habitat enhancement for the benefit of skylark would result in a moderate beneficial, significant effect during operation, and the 'Avoidance of Impacts on Skylark' in the outline Protected Species Mitigation Strategy (oPSMS) [REP1-050] and the 'Skylark Mitigation' section in the oLEMP [REP1-064] set out the proposed mitigation and compensation for skylark. Can you explain: a) why the proportion of territories to be compensated is 50% of the baseline and why a higher figure has not been targeted? b) the purpose of the additional opportunistic areas set out in figure 2 of the oPSMS [REP1-050] how these areas will operate alongside other uses (for example the presence of PV panels on subsite 7J), whether they are included within the calculations for the skylark mitigation provision and whether these areas are to be secured for the lifetime of the development, for this purpose. c) whether the managed open grassland habitats referred to in paragraph 10.2.4 of the oPSMS [REP1-050] have a dual purpose such as also being a community accessible space? If so, how will the uses interact or be managed, and how would any dual use impact or avoid adverse effects on the anticipated breeding opportunities. d) how the skylark mitigation plot at site 6 would interact with the high bat activity levels recorded in the bat activity survey report [APP-157] and whether the bat activity informed the design of proposed mitigation area. e) how the monitoring of targets and management would be undertaken to understand whether the implementation of the skylark plots and habitat enhancement has been successful and achieved the significant beneficial effects? What thresholds or measures would identify underperformance and whether any remedial action or adaptive measures are required? f) whether there are any further concerns in relation to the skylark mitigation strategy or implications for other farmland birds. If so, please set these out and provide any further explanation.
Q2.8.3	The applicant Norfolk Wildlife Trust Block East Pye Solar	**Bat bunkers – Spring Wood** Can you provide a map with the location of the bunkers in Spring Wood and details (where known) of how the external area of the bunkers can be accessed?
Q2.8.4	a) to f) The applicant e) (i) Natural England	**Bats - functional connectivity** Further to Natural England's (NE) response to ExQ1.10.1 and concerns raised by IPs [REP1-213, REP1-394, REP1-404] please explain further how functional connectivity for bats would be maintained throughout construction, operation and decommissioning. In particular: a) identify any key habitats and features used as commuting routes, such as hedgerows, woodlands and other linear habitats and how connectivity between known and potential roosts and foraging habitats would be maintained. b) explain how the bat activity survey report results [APP-157] have been used to determine which habitats and routes are important for maintaining functional connectivity for bats, including for Barbastelle bats. c) explain how the proposed avoidance and mitigation measures including retained habitats, buffers, lighting and reinstatement of temporarily removed habitat are sufficient to ensure any identified or important commuting routes would remain functionally connected, particularly where hedgerows would be removed. d) explain the basis for concluding that temporary gaps of 10m would not impact bat movement, including whether the sensitivity of different bat species has been considered and whether this affects the conclusions. e) respond to SNC's comment at SNC EB-20 in the SoCG [REP1-086] regarding the provision of 25m buffers to features including hedgerows, lines of trees, watercourses and arable field margins. In particular, (i) comment and explain whether a greater buffer should

ExQ2	Question to:	Question:
		be provided to these features or not, where there are particularly important commuting routes or foraging habitats and if so, how would these be identified and secured? (ii) what would the implications of this be? f) should a specific dark corridor plan be provided, if not, can you explain and justify why not?
Q2.8.5	(all) The applicant (e) Norfolk County Council, South Norfolk Council and Natural England	**Bats - foraging / commuting** ES chapter 8 [APP-044] concludes that the 'operational phase of the scheme would result in a moderate beneficial positive effect, which is significant at a local scale for foraging / commuting bats'. NE's response to ExQ1.10.1 [REP1-111] advises that proportionate monitoring should be secured to test the relevant assessment predictions and the effectiveness of mitigation where conclusions depend on habitat establishment or outcomes which cannot be confirmed before construction. The monitoring arrangements should include defined objectives, appropriate review points and a mechanism for corrective management where the intended ecological outcomes are not achieved. With specific reference to foraging / commuting bats please provide the following: a) further justification for the moderate beneficial, significant effect that would result for foraging / commuting bats. b) whether targets would be set and management and monitoring would be undertaken in relation to habitat delivery measures (including retained, reinstated, created and enhanced habitats) to ensure they are of benefit for commuting and foraging bats. c) whether instant hedgerows (over 2m in height) would be used to minimise impacts, and if so, where would these be used? d) what adaptive management or remedial measures would be undertaken if monitoring established the specific enhancements had failed? e) are b) to d) sufficiently secured in the submitted documents?
Q2.8.6	The applicant	**Deer and large mammal movement** Given that the perimeter fencing would deter or exclude deer from large parts of the order limits, can you explain how the proposed green corridors would maintain sufficient habitat and safe, functional movement routes for deer and other larger mammals, including whether use of the green corridors would avoid displacement towards residential areas, impacts on ancient woodlands or increased use and crossing of roads?
Q2.8.7	The applicant	**Hedgerow removal** Can you provide details of the maximum length of hedgerow that would be permanently and temporarily removed in a worst-case scenario, including removal associated with the cable route corridor, in relation to visibility splays and access tracks and any road widening or haulage routes.
Q2.8.8	The applicant Natural England	**Veteran tree - buffer zone** In the SoCG [REP1-091] with NE, the position from NE is that they welcome the implementation of a 30m buffer zone around veteran trees and this should also be secured in the oLEMP [REP1-064], oCEMP [REP2-010] and oDEMP [REP2-014], however the Design Principles, Parameters and Commitments [REP1-078] secures 15x width of tree stem diameter or 5 metres from the edge of the tree's canopy, whichever is greater. Can you clarify what buffer zone should be used and why?
Q2.8.9	The applicant	**Woodland planting** The Forestry Commission in their RR [RR-0604] raises concern in relation to Doyly's Grove and Ringers Grove and states that ideally woodland planting should be in blocks of at least 5 hectares or link to other existing woodland to create blocks of at least 5ha. Whilst it is noted that there is woodland planting proposed, can you provide details and measurements of the proposed woodland planting areas and explain whether the design of the proposed woodland planting areas and size of the blocks proposed achieve these recommendations.
Q2.8.10	The applicant	**Site 3** Following concerns raised in RRs and maintained by IPs including Norfolk Wildlife Trust [REP1-404] and BEPS [REP1-394] in relation to site 3, the applicants PDA [PDA-009] and deadline 1 [REP1-099] responses to these comments identify measures intended to mitigate impacts on County Wildlife Sites (CWS) but does not appear to directly address the suggestion that site 3 should be removed from the order limits. Can you explain why site 3 has been retained, how the mitigation hierarchy informed that decision and how potential impacts on the CWS, ancient woodland and bats were considered in its retention?
Q2.8.11	The applicant	**Biodiversity Net Gain (BNG)** a) Can you explain and provide evidence of how biodiversity enhancements have been maximised as set out in paragraph 2.10.70 of NPS EN-3.

ExQ2	Question to:	Question:
		b) Can you clarify the proposed timescales for the delivery of BNG and how this will relate to any phasing of the proposed development? c) Are there any control mechanisms to ensure the proposed BNG is delivered at an early stage in the implementation of the proposed development and where are these set out?
Q2.8.12	The applicant	**Outline Protected Species Mitigation Strategy (oPSMS)** This oPSMS [REP1-050] expressly sets out that it relates to mitigation measures during the construction phase (at paragraph 1.1.2), however table 4.3 of the oDEMP [REP2-014] specifically refers to the oPSMS and therefore should this document and R8 of the dDCO [REP1-014] reference other phases of the proposed development?
Q2.8.13	The applicant	**Landscape and Ecology Management Plan - monitoring** The outline management schedule in table 4.1 of the oLEMP [REP1-064] only extends to year 5 for landscape and ecology measures. Can you clarify the total duration the measures in the oLEMP and final version of the LEMP would be managed and monitored for, and whether this would be for the 60-year lifetime for some elements of the proposed development and in perpetuity for the National Grid substation elements?
Q2.8.14	Norfolk County Council South Norfolk Council Natural England Norfolk Wildlife Trust	**Management plans and dDCO** The documents submitted by the applicant [including APP-044, APP-156, APP-157, REP1-048; REP2-027] demonstrate and acknowledge the presence of white-clawed crayfish, great-crested newts and a number of bat species within or in proximity to the order limits. a) Do you consider that the applicant has had sufficient regard to the presence of these species in drafting the method statements as set out in the oPSMS [REP1-050], the oCEMP [REP2-010], the oLEMP [REP1-064] and dDCO [REP1-014]? If not, then what further measures or detail should be included? b) Are you satisfied the control documents include sufficient and relevant monitoring, management and remedial measures to ensure effective control of effects during construction, operation and decommissioning? Should there be any further specific monitoring for barbastelle bats or wider bat assemblages, white-clawed crayfish, great-crested newts or other notable species, please specify any relevant detail.
Q2.8.15	The applicant	**Data monitoring** Following the recent decision for Green Hill Solar Farm (2026) and Great North Road Solar and Biodiversity Park (2026) and the SoS information requests inviting a commitment to regularly share records and monitoring data of notable species identified during ecological monitoring surveys during pre-construction, construction, post-construction and operation with relevant Local Environmental Records Centres and relevant national and regional environmental recording schemes, please can you comment on providing a similar commitment within the oLEMP [REP1-064] and oPSMS [REP1-050], as necessary.
Q2.8.16	The applicant Norfolk Wildlife Trust	**Ecology stakeholder group** Norfolk Wildlife Trust (NWT) have raised the need for an ecology stakeholder group to be set up to 'advise on the scheme's design and ongoing management of ecological areas and be reactive to monitoring data and difficulties in habitat establishment on site'. Following any further discussions between the applicant, NWT and any other stakeholders can you confirm whether a working group will be established and if not, why not? If such a group is to be formed, then suitable commitments and wording should be provided in the next versions of the oCEMP, oLEMP and oOEMP as necessary.
Q2.8.17	The applicant	**Cumulative effects – bats** A number of interested parties have raised concerns regarding the cumulative effects on barbastelle bats. Explain how cumulative effects on barbastelle bats and wider bat assemblages have been assessed. Given ES chapter 8 [APP-044] identifies the cumulative effect on bats to be not significant, largely due to embedded mitigation, have you considered cumulative effects given that no project-specific adverse effects are predicted?
9. Electromagnetic fields		
Q2.9.1	The applicant	**Electromagnetic field assessment assumptions** The applicant concludes that operational electromagnetic field (EMF) effects would not be significant, based on the findings of the ES and High-Level Electromagnetic Field Assessment ([APP-053], [APP-188]). a) Identify the maximum electrical loading assumptions applied within the assessment, including assumptions relating to peak export capacity, BESS operation, inverter operation and grid connection infrastructure.

ExQ2	Question to:	Question:
		b) Explain why the applicant considers these assumptions to represent a realistic worst-case operational scenario. c) Confirm whether simultaneous maximum generation and battery operation has been assessed and, if not, explain why this would not materially alter the conclusions of the assessment. d) Explain how compliance with applicable EMF exposure limits would be demonstrated should the detailed design differ from the assumptions relied upon within the assessment.
Q2.9.2	The applicant	**Compliance with ICNIRP guidelines** The applicant concludes that the proposed development would comply with relevant UK health protection standards and International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines [APP-053; APP-188]. a) Provide a clear explanation of the methodology used to demonstrate compliance with applicable ICNIRP reference levels. b) Identify the locations where the highest EMF exposures are predicted to occur. c) Provide the maximum predicted magnetic field strength and electric field strength at those locations and indicate how these compare to applicable ICNIRP reference levels. d) Explain whether any element of the assessment relies upon precautionary assumptions and, if so, identify those assumptions.
Q2.9.3	The applicant	**Sensitive human receptors** The applicant concludes that significant effects on human health from EMFs are unlikely [APP-053]. a) Identify the residential properties and other sensitive receptors located closest to operational substations, inverter stations, battery storage infrastructure and underground cable routes. b) Explain how potential exposure at these receptors has been assessed. c) Provide the predicted maximum EMF levels at the nearest sensitive receptors. d) Explain whether receptor-specific modelling was undertaken and, if not, why the applicant considers the assessment to be proportionate.
Q2.9.4	The applicant	**Public rights of way (PRoW) and recreational users** The assessment concludes that significant EMF effects would not arise for members of the public [APP-053]. a) Identify those PRoW, permissive paths and publicly accessible areas which pass closest to electrical infrastructure associated with the proposed development. b) Provide the maximum predicted EMF levels at these locations. c) Explain how users of PRoW were considered within the assessment. d) Explain whether any operational monitoring or verification is proposed at publicly accessible locations and, if not, why this is not considered necessary.
Q2.9.5	The applicant	**Watercourse crossings and buried cables** The applicant relies on buried cable design and attenuation of magnetic fields in concluding that significant ecological effects are unlikely [APP-044]. a) Identify all watercourse crossings where EMFs have been considered within the assessment. b) Provide the assumed cable burial depths and installation methodologies at these locations. c) Explain how attenuation of magnetic fields has been assessed. d) Explain whether the assessment remains valid across the full design flexibility sought by the dDCO. e) Identify where the assumptions relied upon in the assessment are secured.
Q2.9.6	The applicant	**Radio communications and operational infrastructure** Representations received during the examination have raised concerns regarding the potential for interference with communications systems and operational infrastructure ([REP2-025], [REP2-026], [REP2-030]). a) Identify all communications systems, radio systems and operational infrastructure considered within the EMF assessment. b) Explain the evidence relied upon to conclude that significant interference effects would not occur.

ExQ2	Question to:	Question:
		c) Identify any consultation undertaken with relevant operators and summarise the outcome. d) Explain whether any monitoring or investigation procedure would be implemented in the event that operational interference is reported after commissioning.
Q2.9.7	The applicant	**Operational monitoring and compliance** With reference to the oOEMP [REP2-012] and Commitments Register [REP2-016], provide details of any proposed operational monitoring, inspection, auditing, verification or compliance arrangements relating to EMFs associated with the proposed development. The response should include: a) monitoring or verification methodology b) frequency of monitoring or inspection activities c) relevant assessment criteria, standards or guideline values d) reporting arrangements e) trigger levels for further investigation f) corrective actions that would be implemented should monitored conditions differ materially from those assessed within the ES.
Q2.9.8	The applicant	**Access controls and exposure pathways** The ExA notes that the management plans and commitments register ([APP-203], [REP2-012], and [REP2-016]) contain measures relating to site security, fencing, gated access, PRoW and permissive paths. a) Explain how the final design and management of PRoW, permissive paths, access arrangements, fencing and other security measures would ensure that members of the public are not exposed to EMFs beyond the levels assessed within the ES. b) Identify all locations where public access would be retained in proximity to substations, transformers, battery energy storage infrastructure, inverter stations, underground cables or other electrical infrastructure. c) Confirm whether the EMF assessment assumes any minimum separation distances between the public and electrical infrastructure and explain how any such distances would be secured.
Q2.9.9	The applicant	**Design evolution and future assessment** The ExA notes that aspects of the electrical infrastructure design may be subject to further detailed design following the grant of development consent. With reference to the mitigation and management measures contained within [REP2-016], [REP2-012], and [REP1-066]; a) Confirm whether any future detailed design changes relating to substations, transformers, battery energy storage systems, inverter stations, cable specifications, cable routing or other electrical infrastructure could materially alter the conclusions of the ES EMFs assessment. b) If so, explain how such changes would be assessed, reviewed and approved. c) Identify the mechanism through which the relevant planning authority, statutory bodies and other stakeholders would be satisfied that the conclusions of the EMF assessment remain valid following detailed design.
10. Ground conditions		
Q2.10.1	The applicant	**Baseline ground conditions and reliance on future investigation** The ground conditions assessment [APP-052] concludes that likely significant effects relating to contamination, geology, hydrogeology and geotechnical conditions would be avoided through embedded mitigation and implementation of standard construction controls. The Phase 1 Ground Conditions Assessment [APP-184] acknowledges that further intrusive investigations would be undertaken during subsequent design stages. In its response to ExA written questions, the applicant [REP1-083] confirms that additional site-specific investigations and monitoring would be undertaken where required during detailed design. Explain why the ExA can be satisfied that the baseline ground conditions across the order limits are sufficiently understood for development consent to be granted. Identify any remaining uncertainties that are dependent upon future intrusive investigations and explain why those uncertainties could not materially alter the conclusions of the ES.
Q2.10.2	a) The applicant b) Environment Agency	**Groundwater protection, preferential pathways and outstanding hydrogeological assessment** The Environment Agency's RR and subsequent submissions [RR-0587], [REP1-191], and [REP2-037] identify continuing concerns regarding the potential for piling, driven foundations, trenching and trenchless crossings to create preferential groundwater pathways, alter groundwater

ExQ2	Question to:	Question:
		movement and mobilise contaminants. The SoCG [REP1-087] records continuing discussions regarding hydrogeological risk assessment and groundwater protection measures. a) Applicant: Explain how construction activities, including piling, driven foundations, cable trenching, trenchless crossings and associated earthworks, would avoid the creation of preferential contaminant pathways between geological strata and groundwater bodies. Identify any outstanding hydrogeological assessments, groundwater investigations or foundation works risk assessments and explain how the ExA can conclude that significant adverse effects on groundwater resources would not occur before those assessments have been completed. b) Environment Agency: Provide an update on whether the information submitted to date adequately identifies and mitigates risks relating to preferential pathways, groundwater mixing and contaminant mobilisation. If not, identify the outstanding information, assessment work or mitigation detail that remains necessary before the Agency's concerns can be considered resolved.
Q2.10.3	The applicant	**Foundation design and groundwater risk** The applicant's assessment [APP-052] relies upon outline design assumptions in relation to solar panel foundations, BESS infrastructure, substations and associated development. The Environment Agency has indicated through its examination submissions ([REP1-191], [REP2-037]) that detailed foundation proposals may be required to fully assess groundwater risks. Provide further justification for deferring detailed foundation works risk assessments until post-consent stages. Explain how the ExA can conclude that foundation construction would not result in unacceptable geotechnical, contamination or hydrogeological effects in the absence of final foundation design information.
Q2.10.4	The applicant	**Adequacy of groundwater baseline information** Representations submitted by Block East Pye Solar and its advisers [REP1-370; REP1-387] raise concerns regarding the adequacy of the applicant's assessment of hydrogeological conditions, groundwater sensitivity and contamination risks within parts of the order limits, including areas underlain by principal aquifer designations. The ground conditions assessment [APP-052] relies primarily on desk-based information and publicly available environmental datasets. Provide a site-specific justification for why additional intrusive soil and groundwater investigations are not required before development consent is granted for those areas identified as hydrogeologically sensitive within examination submissions ([REP1-370], [REP1-387]). In doing so, explain how groundwater levels, seasonal variation and contaminant migration risks have been adequately characterised.
Q2.10.5	a) The applicant b) Environment Agency	**Historic land use and contamination risks** The Phase 1 Ground Conditions Assessment [APP-109] identifies a number of historical land uses and potential contaminant sources within and surrounding the order limits. The Environment Agency's RR and subsequent examination submissions ([RR-0587], [REP1-191], [REP2-037]) indicate that further groundwater monitoring and contamination assessment may be required in respect of certain historical activities. a) Applicant: Explain whether all potentially contaminative historical land uses within the order limits have been adequately investigated and assessed. b) Environment Agency: Confirm whether the applicant's assessment of historical contamination sources is sufficient for the purposes of the examination and identify any remaining areas where further investigation is required.
Q2.10.6	The applicant	**Reliance on post-consent controls and management plans** ES chapter 16 [APP-052] concludes that residual ground conditions effects would be negligible or minor following implementation of mitigation measures. A number of those measures rely upon future management plans, construction controls, site investigations and approvals secured through post-consent processes [APP-052], [REP2-024]. Identify all aspects of the ground conditions assessment that remain dependent upon future surveys, investigations, management plans, risk assessments or approval processes. For each matter, explain why sufficient certainty exists at the application stage for the ExA to conclude that significant adverse effects would not arise.
Q2.10.7	The applicant	**Mineral safeguarding and resource sterilisation** The Minerals Resource Assessment Desk Study [APP-187] concludes that the proposed development would not result in significant effects on safeguarded mineral resources and that any sterilisation would largely be temporary in nature. The ExA requires assurance that mineral safeguarding interests have been considered consistently with national policy and local minerals safeguarding policies.

ExQ2	Question to:	Question:
		Provide an updated assessment of mineral sterilisation resulting from the proposed development, distinguishing between temporary and permanent impacts and explaining how mineral safeguarding interests have been taken into account in site selection, design evolution and project layout.
Q2.10.8	The applicant	**Geotechnical constraints and construction feasibility** The Ground Conditions chapter [APP-052] concludes that geological and geotechnical constraints would not prevent implementation of the proposed development. However, examination submissions [REP1-370, REP1-387] contend that aspects of construction feasibility, excavation activity, foundation design and interaction with groundwater conditions remain insufficiently evidenced. Explain how the applicant has satisfied itself that there are no geotechnical constraints that could materially affect construction feasibility, environmental effects or the final design of the proposed development. In doing so, identify any assumptions relied upon within the assessment and provide justification for those assumptions.
Q2.10.9	a) The applicant b) Environment Agency	**Outstanding matters with the Environment Agency** The SoCG between the applicant and the Environment Agency [REP1-087] identifies areas of agreement but also records ongoing discussion relating to groundwater protection, hydrogeological assessment and environmental permitting matters. The Environment Agency's deadline 1 and deadline 2 submissions [REP1-191], [REP2-037]) provide further commentary on these matters. a) Applicant: Provide an updated position on all ground conditions matters that remain under discussion with the Environment Agency. b) Environment Agency: Confirm whether any matters remain unresolved and identify those issues which, in its opinion, require additional information, mitigation, controls or amendments to the draft DCO before development consent could be granted.
11. Human health and wellbeing		
Q2.11.1	Environment Agency	**Water environment protection measures** The applicant concludes within [APP-054] and [REP2-021] that residual effects on the water environment would not be significant following mitigation. However, concerns [REP2-037] remain regarding the effectiveness of the proposed mitigation during abnormal or emergency events. With reference to the mitigation measures relied upon by the applicant, state whether the Environment Agency agrees that the proposed containment and drainage strategy would adequately protect human health and the water environment from contamination events, including battery fire incidents. If not, identify any outstanding matters requiring further assessment or resolution.
Q2.11.2	The applicant	**Vulnerable populations and health inequalities** The applicant's Mental Health and Wellbeing Addendum [REP1-107] acknowledges that individual experiences may differ from population-level conclusions and identifies that certain groups, including people with pre-existing health conditions and neurodivergent individuals, may experience environmental change differently. The Equality Impact Assessment [APP-214] also considers effects on persons with protected characteristics. Further concerns have been raised by interested parties, including [REP2-040], regarding the extent to which the assessment provides evidence of outcomes for such groups. Explain how the assessment presented within [REP1-107], together with the Equality Impact Assessment contained within [APP-214], has specifically assessed effects upon children, older people, disabled people, individuals with pre-existing mental health conditions, neurodivergent individuals and carers. Identify any mitigation measures specifically intended to address effects on such groups and explain how those measures would be secured.
Q2.11.3	The applicant	**Mental health effects from environmental change** The applicant concludes within [REP1-107] Mental Health and Wellbeing Addendum that residual mental health and wellbeing effects would not be significant. However, representations provided by Moringthorpe and Fritton Parish Council [REP2-030], Block East Pye [REP2-052], along with other interested parties including [REP2-060] and [REP2-065], dispute this conclusion and submit that the assessment does not adequately account for the combined effects of prolonged construction activity, landscape change, perceived industrialisation of the local environment and long-term uncertainty associated with the proposed development. Explain how these pathways have been assessed within the applicant's human health and wellbeing evidence base and provide the evidence supporting the conclusion that significant adverse mental health and wellbeing effects would not occur.

ExQ2	Question to:	Question:
Q2.11.4	The applicant	**Place attachment, landscape change and wellbeing** The applicant's Mental Health and Wellbeing Addendum [REP1-107] identifies place attachment, changes to landscape character, connection to the countryside and access to nature as relevant determinants of wellbeing. Provide a receptor-based assessment of those communities and households expected to experience the greatest environmental and landscape change resulting from the proposed development and explain how any resulting wellbeing effects have been assessed and reflected within the overall conclusions of the human health assessment.
Q2.11.5	The applicant	**Operational noise and human health** Explain how human health effects arising from operational noise have been assessed within the applicant's wider human health evidence base, independently of the significance conclusions reported within the noise assessment. Identify those receptors expected to experience the highest degree of noise-related change and explain how the residual health effects for those receptors have been determined.
Q2.11.6	The applicant	**Construction health and wellbeing effects and community burden** Provide a location-specific assessment of those communities expected to experience the greatest combination of construction noise, traffic, dust, disruption and temporary loss of amenity. Explain how the cumulative health effects arising from those overlapping impacts have been assessed and identify the mitigation measures relied upon to reduce any resulting health and wellbeing burden.
Q2.11.7	The applicant	**Construction traffic, accessibility and community safety** Explain how the applicant's human health assessment [APP-054] has considered potential health effects arising from temporary changes in traffic conditions, road safety and accessibility during construction. The response should identify any mitigation measures specifically intended to protect pedestrians, cyclists, equestrians, school children and other vulnerable road users.
Q2.11.8	The applicant	**Cumulative human health and wellbeing effects on most affected receptors** Provide an assessment of the cumulative human health effects anticipated for those households expected to experience the greatest combination of construction disturbance, operational effects, landscape change, recreational impacts and proximity to infrastructure. Explain how the overall residual effect has been derived and why the applicant considers that effect to be acceptable.
12. Landscape and Visual		
Q2.12.1	a) and c) The applicant b) South Norfolk Council	**Landscape Susceptibility in relation to Energy Generation, Storage and Transmission Supplementary Planning Document (SPD)** This SPD was adopted by SNC in February 2026. Paragraph 1.2.2 explains that it will be a material consideration for a wide range of energy related developments including NSIPs. a) Notwithstanding that paragraph 7.1.25 of appendix 2.3 (Legislation, Planning Policy and Guidance) [APP-115] of the ES says that this SPD is not considered to be directly applicable to the proposed development, does the applicant agree that the SPD is capable of being a material consideration that is important and relevant to the determination of the application? b) Could SNC comment on the applicant's reasons set out in paragraph 7.1.25 of ES appendix 2.3 on why the SPD is not considered to be directly applicable to the proposed development? c) The applicant states in its response to SNC's LIR [REP2-022] that it is seeking to provide further detail with regard to the determination of susceptibility for landscape receptors at a future deadline. The ExA requests that this is submitted for deadline 3.
Q2.12.2	The applicant	**National Policy Statement EN-1** Paragraph 5.10.25 of NPS EN-1 says in considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the SoS in judging the weight they should give to the assessed visual impacts of the proposed development. a) Can the applicants provide any examples of such existing permitted infrastructure with a similar magnitude of impact? b) What examples of good practice can be inherited from other similar developments?
Q2.12.3	South Norfolk Council	**Residual effects** Paragraph 7.2.18 of SNC's LIR [REP1-213] states that residual adverse effects on landscape character and visual amenity are expected to remain significant, even after mitigation.

ExQ2	Question to:	Question:
		With reference to the applicant's summary of landscape and visual effects in chapter 7 of the ES [APP-043], could SNC make clear where it agrees or disagrees with the applicant's assessment of residual effects and provide an outline of its justification where there is disagreement?
Q2.12.4	South Norfolk Council	**Effects of screening** SNC, in paragraph 009 of its LIR [REP1-213] expresses concern that screening the proposed development can itself increase enclosure, interrupt long views and create a tunnel effect and that the resulting route experience may remain substantially changed and adverse. To assist the ExA, can SNC refer to specific locations, and accompanying reasoning, where it considers that the proposed development would lead to such adverse effects?
Q2.12.5	a) and b) The applicant b) South Norfolk Council	**Convertor units/switch rooms etc and associated fencing (Works No. 1(c) and 7)** The applicant has explained [action point 23 of REP1-098] that it needs full flexibility of the detailed design for these works to be located anywhere with the scope of Work No.1. a) To assist the ExA's understanding of the potential landscape and visual effects of these works, the applicant is requested to explain in further detail how they have been assessed for each site. This should take account of full design and location flexibility afforded in the design parameters, along with the proposed 3m high palisade fencing that is proposed (Work. No.7) for each within the Design Principles, Parameters and Commitments [REP1-078]. b) Noting that discussions are taking place on the design principle etc of components of the proposed development, what measures can be introduced to ensure that the design and siting of these features respects as far as possible the rural location in which they would be located?
Q2.12.6	a) and b) The applicant b) South Norfolk Council, Norfolk County Council and Block East Pye Solar	**Offset distance to public rights of way** The Design Principles, Parameters and Commitments [REP1-078] sets out a minimum offset distance of 15 metres between scheme elements and PRoW. a) Explain why a minimum 15m was chosen for this minimum offset distance, taking account of the maximum height parameters of the proposed solar panels and the sensitivity of particular stretches of public rights of way. b) Taking account of submissions at deadline 1, along with the applicant's responses at deadline 2, are there any locations within the proposed scheme, where a greater minimum offset distance would be of particular benefit in reducing visual effects on PRoW users? Provide reasoning for your answer.
Q2.12.7	South Norfolk Council	**South Norfolk Council site-specific considerations** SNC makes a range of recommendations to reduce the level of landscape and visual harm along with other site specific comments in paragraphs 94 to 148 of its LIR [REP1-213] and the applicant has responded to these at deadline 2 [REP2-022]. a) For each recommendation, set out the extent to which the level of harm would be reduced with reference to the applicant's summary of landscape and visual effects in chapter 7 of the ES [APP-043]. b) The Council is asked to provide a summary response to the applicant's comments on each of its recommendations.
Q2.12.8	The applicant	**South Norfolk Council site-specific considerations** In response to the recommendation paragraph 132 of SNC's LIR [REP1-213] the applicant states that "it would not be consistent with the government's objectives to deliver a scheme which is smaller than that which has been assessed as acceptable on a planning basis." Later, in response to the recommendation in paragraph 134 of the SNC LIR, the applicant states that "the removal of development from this portion of the site represents a considerable loss to the generating capacity for the scheme and it is also the location of the proposed project substation." a) To what extent are potential reductions in the areas proposed for Work No.1 possible, without leading to a material change to the benefits in terms of renewable energy that would arise from the proposed development as a whole? b) Noting that the applicant will discuss some requests further through the SoCG process, provide an update arising from any such ongoing discussions with SNC and NCC on any potential suggested alterations that could reduce the effects of the scheme without materially altering the benefits that would arise from it.
Q2.12.9	The applicant	**Lighting** In response to concerns expressed regarding the landscape and visual effects of proposed lighting, the applicant explains that the lighting strategy [APP-151] would minimise light intrusion and effects on landscape and visual receptors in the context of the scheme which has limited light sources. Therefore, the applicant has not included an assessment of the effects of lighting.

ExQ2	Question to:	Question:
		a) The applicant is requested to provide an estimate for the expected frequency of use of intermittent lighting sources including motion activated security lighting and how long the lighting would operate for (be switched on) in each instance of use. b) Explain how any lighting installation would be checked, monitored and managed over the lifetime of the project, to ensure that any adverse effects from lighting are properly minimised. c) Notwithstanding the applicant's position that no significant effects would result from lighting, provide further explanation and assessment of the effects of lighting on landscape and visual receptors, during construction and operation, to justify this conclusion.
Q2.12.10	South Norfolk Council	**Viewpoint locations** SNC's LIR [REP1-213] says that although viewpoints locations were previously agreed, the submitted set does not adequately illustrate all reasonable worst-case scenarios and that more viewpoints should have been located where PRoW pass through or directly alongside arrays, particularly where development would occur on both sides. It goes on to say that notable omissions include WA-FP43 and Via Beata north of Site 2C and School Road/Boudicca Way at Site 5. Has SNC any outstanding concerns regarding the visualisations provided further to the applicant's response to its concerns [REP2-022]?
Q2.12.11	The applicant	**Photomontages** Can the applicant explain why winter year 15 photomontages have not been provided, which could helpfully show the effects of the proposals with leaf-off in winter as well as the position in summer year 15 with established landscape measures shown?
Q2.12.12	The applicant	**Great Moulton** Paragraph 43 of NCC's LIR [REP1-211] expresses concern regarding the effects upon the setting of villages and settlements. In the case of Great Moulton, the scheme proposes a range of new infrastructure to the south of the village, including, but not limited to, solar arrays (Work No.1), BESS (Work No.2), 400kV substation (Work No.3), National Grid substation (Work No.4), overhead transmission line works (Work No.5), fencing, security, acoustic barriers, landscaping mitigation etc (Work No.7). Expanding on the assessment provided within chapter 7 of the ES [APP-043] and related documents, the applicant is requested to provide further detail and explanation of the extent to which the combined effects of each element of the proposed development would affect the existing rural character and setting of Great Moulton. This should include a detailed assessment and explanation of the location and extent that each of the proposed works would contribute to the overall effects upon the rural character and setting based on the maximum design parameters.
Q2.12.13	The applicant	**Single-axis tracker panels** The applicant's response [REP2-022] to SNC's LIR [REP1-213] notes that single axis panels will vary in maximum height (up to 4.5m) depending on their angle of tilt. Provide diagrams showing how the angle of tilt (and therefore the height of the panels) will typically vary across the day for each month of the year.
Q2.12.14	a) and b) Norfolk County Council and South Norfolk Council c) The applicant	**Outline landscape and ecology management plan** In its LIR [REP1-211] NCC highlights the importance of the oLEMP, including to ensure that there can be confidence in the deliverability, monitoring and management of mitigation planting (paragraphs 5.86 to 5.92). a) Both NCC and SNC are requested to continue engagement with the applicant in order to seek agreement on the content of the oLEMP with the aim of ensuring that there can be confidence in the deliverability and success of landscape management and mitigation. b) NCC and SNC are requested, for deadline 3, to provide a summary of the main issues it currently has with the drafting of the oLEMP. Any further updates should also be provided with the respective SoCG between the parties. c) In addition to the engagement outline above, the applicant is requested to also provide an update on engagement on these matters including how this has been reflected in the latest version of the oLEMP. This should also include how the measures set out in paragraphs 5.91, 5.107 and 5.111 of NCC's LIR have been incorporated into the oLEMP.
Q2.12.15	The applicant	**Overhead electricity line works (Work No.5)** a) Explain in further and more specific detail how Work No.5 has been assessed in the landscape and visual assessment, including consideration of the location, design and appearance of the pylons, the potential difference in height and design between existing and proposed pylons (up to 8 metres) and how the works would relate to the existing landscape character of the area and visual receptors. b) Why is a height difference of up to 8m required between the existing and proposed?

ExQ2	Question to:	Question:
		c) What engagement has been carried out with NGET in terms of the proposed design approach for the electricity line works and how has it influenced the Design Principles, Parameters and Commitments [REP1-078]?
Q2.12.16	South Norfolk Council	**Cumulative effects** Paragraph 011 of SNC LIR [REP1-213] raises concern regarding the combined landscape and visual effects of the proposed development, together with existing and consented NSIPs. Can SNC elaborate on its concern, including the schemes it considers would lead to such cumulative landscape and visual effects (noting section 9 of its RR [RR-1795] and paragraph 028 of its LIR [REP1-213), the effects it considers would result and its reasoning for this?
Q2.12.17	The applicant	**Permitted preliminary works – vegetation clearance** The applicant has submitted a Permitted Preliminary Works Environmental Management Plan (PPWEMP at deadline 2 [REP2-024]. The permitted preliminary works (PPW) include 'site clearance, including vegetation removal and demolition of existing buildings and structures'. a) Is it the intention that 'site clearance, including vegetation removal' only includes that necessary for the other listed permitted preliminary works to be carried out and not, for example, the general removal of vegetation to prepare for the construction of the different works such as solar arrays, substations, the cable route or creation of visibility splays? b) If so, can this be more clearly set out in the PPWEMP as the current drafting is not entirely clear in this respect? For example, table 3.2 of the PPWEMP says that tree removal works are only necessary for the list of works set out as PPW. However, the defined list of PPW includes site clearance, including vegetation removal, and so under the current drafting the tree removal works could be read as being necessary for these more general works. c) The list of PPW includes 'the provision of temporary means of enclosure and site security for construction'. Is this intended to be for the enclosure of the proposed construction compound areas? Would it involve the loss of, or works to, any trees or hedges?
Q2.12.18	(all) The applicant b) and c) Norfolk County Council and South Norfolk Council	**Watering and maintenance of new planting** a) Explain how the watering of new planting will be carried out, including how this will be maintained in dry or drought conditions. b) Does the oLEMP make appropriate provision for the watering and maintenance of new planting, including in dry or drought conditions? c) What further provisions and oLEMP drafting may be required to ensure appropriate maintenance and management of new planting?
Q2.12.19	The applicant South Norfolk Council Norfolk County Council	**Outline landscape and ecology management plan** a) Provide an update on drafting and on-going engagement on the oLEMP [REP1-064], noting on-going discussions between the applicant, SNC and NCC. b) Set out any key measures that remain under disagreement and how these may be resolved?
Q2.12.20	The applicant	**Glint and glare** The applicant's response [REP1-083] to ExQ1.1.1 explains that mitigation for effects on roads, dwellings and aviation activity would include changing the panel configuration embedded into the design. a) Explain in further detail how this will be considered at the detailed design stage to ensure that glint and glare effects are properly mitigated, including cross-references to any relevant specific wording in any control document. b) At the detailed design approval stage what relevant details would be provided to ensure that the relevant local authority, in considering the detailed design, will be able to properly consider how and where this has been considered and assessed.
Q2.12.21	The applicant	**Mitigation hierarchy** The applicant's landscape and visual assessment [APP-118] finds that significant adverse effects would result in several locations, including but not limited to sites 1, 7 and 8. Explain further how the mitigation hierarchy has been applied for landscape and visual effects, including why it has not been possible to choose sites that would result in an avoidance or reduction in landscape and visual effects, in comparison to the proposed scheme where significant adverse landscape and visual effects result. For example, why has site 8 remained in the scheme, when its avoidance could have reduced the significant adverse effects arising from the proposed development?

ExQ2	Question to:	Question:
Q2.12.22	(all) The applicant a) South Norfolk Council and Norfolk County Council	**Independent design review process** a) Would the use of an independent design review process be beneficial to help secure and implemented good design in the final design process for any elements of the scheme, such as proposed substations? b) How could this be secured through the dDCO in the event it is considered necessary?
13. Noise and Vibration		
Q2.13.1	The applicant South Norfolk Council Block East Pye Solar	**Adequacy of surveys and noise information** RR and deadline 1 submissions from SNC [RR-1795 and REP1-213] and BEPS [REP1-385 and REP1-387] raise concerns regarding the submitted noise information including the background sound levels, whether there is a sufficient level of information and the noise modelling which has been undertaken. The applicant's response to these is noted (for example [PDA-008, PDA-010, PDA-012]) and it is acknowledged there will be a further update to SNC's technical queries at deadline 3 as set out in the SoCG [REP1-086]. Each party is requested to provide a clear statement of their current position on this matter.
Q2.13.2	The applicant	**Percussive piling** SNC's LIR [REP1-213] raised concerns that percussive piling could generate substantial noise and vibration and that without further geo-environmental or geotechnical investigation, its use may not accord with 'Best Practicable Means'. It is acknowledged that the applicant's response at deadline 2 [REP2-022] (ref: LIR-SNC-014) explains percussive piling is used as a worst-case scenario, and further ground investigation will be undertaken. In light of this, please: a) explain how the ground investigation would inform the selection of installation methods across the various sites and subsites and whether the ground conditions would result in different methods being used. b) identify the reasonable alternative methods to percussive piling that would be considered and how these would be selected in differing locations, for example near commercial properties on Bungay Road. c) confirm whether piling would be used for the installation of the overhead line towers, noting that paragraph 4.4.4 of chapter 4 [APP-040] states 'piles are used where required'? If so, what piling methods would be used and can you clarify whether an assessment of the piling for the towers has been considered within chapter 12 [APP-048] as a worst-case scenario, as this is not noted as a key activity in paragraph 12.8.7.
Q2.13.3	South Norfolk Council	**Operational noise from the National Grid substation** Following the response from the applicant at procedural deadline A [PDA-008] and ongoing discussions regarding noise impacts from the proposed National Grid substation, can SNC: a) explain whether sufficient information has been provided to demonstrate that the National Grid substation can be designed and operated within the committed operational noise limits and if not, what further information you require. b) confirm whether R14 of the dDCO [REP1-014] adequately secures noise modelling and monitoring once the substation has been commissioned to ensure that noise levels of the substation meet the limits set out in the oOEMP [REP2-012] and if not, explain why not. c) outline any further information which is required, any comments on the mitigation and monitoring measures set out in the oOEMP [REP2-012] and whether you consider post-commissioning noise verification is required, and if so, how this should be secured, or ensure this is covered in the SoCG to be submitted at deadline 3.
Q2.13.4	The applicant	**Operational noise - BESS** Paragraph 12.8.47 of ES chapter 12 [APP-048] concludes that there would be a low magnitude of impact at receptor NSR3B due to noise emissions from the BESS. a) As the precise details of BESS are not yet known, what level of certainty is there that potentially low level yet still potentially disturbing levels of noise would not result for this property? b) Why is there not more certainty to the measures outlined in Table 3.7 in the oOEMP [REP2-012] relating to acoustic attenuators, silencers or enclosures and BESS fan speeds to reduce sound levels at the source given the identified impact? c) Should the measure in the oOEMP [REP2-012] relating to the orientation of BESS cooling fans be more specific to reflect what is in ES chapter 12 [APP-048] at paragraph 12.7.15 where it states the embedded mitigation is cooling fans are orientated away from nearby receptors, rather than 'considering the orientation'?

ExQ2	Question to:	Question:
Q2.13.5	The applicant	**Operational noise verification – plant and equipment** Can the applicant clarify, for the various plant and equipment which would be installed throughout the order limits, whether any post installation commissioning verification would be undertaken, when this would take place and whether this is secured within the documents? If not, explain why not.
Q2.13.6	The applicant South Norfolk Council	**Operational noise - monitoring and mitigation** Table 3.7 of the oOEMP [REP2-012] states that regular monitoring and maintenance of equipment will be carried out and where any noise changes identified are above the levels presented in the ES, mitigation will be applied. a) Whilst it is stated that the complaints procedure will be managed in consultation with the LPA, should any remedial work or mitigation which is applied also be carried out in consultation with and details provided to the relevant planning authority? b) If not, please explain how the effectiveness of the monitoring regime and any resulting remedial actions or mitigation would be reviewed and enforced.
Q2.13.7	The applicant	**Noise and distance from source** Following submissions made by a number of IPs at OFH2 and deadline 1 [REP1-134, REP1-171, REP1-243, REP1-262] regarding some individuals or sectors of society who may have specific noise sensitivities. Can you explain how these sensitivities have been considered, including what noise level and duration would result in an impact, the criteria used to determine whether a nuisance would arise and the distances from noise sources at which those effects would be avoided.
Q2.13.8	The applicant	**Abnormal indivisible loads (AIL) / Emergency construction traffic movements** Paragraph 2.5.2 of the oCEMP [REP2-010] sets out that for AIL or emergency construction traffic movements which occur outside of normal working hours, specific noise mitigation measures will be put in place. Can you clarify what they are and where these mitigation measures are set out?
Q2.13.9	The applicant	**Vibration - construction HGV movements** Paragraph 12.8.34 of ES chapter 12 [APP-048] sets out that vibration levels from HGV passbys during construction within 5-10m of access road could cause short-term moderate adverse effects, which are significant. Although paragraph 12.8.36 refers to impacts at some properties, this appears to relate to impacts from abnormal loads and not with reference to HGVs. Can you therefore set out the following in relation to HGV passbys above the significant observed adverse effect level (SOAEL): a) whether there are any receptors, how many and where they are located? b) does the assessment take into account the construction of receptors, especially listed buildings and criteria for fragile buildings (paragraph 12.5.43 of [APP-048]) and should a more conservative limit of 3mm/s PPV be used for certain structures? c) would the conclusions in the assessment differ following the consideration of the fragility of affected structures? d) is any mitigation proposed or should any be considered in certain circumstances, please explain? e) how the conclusions in paragraph 12.8.34 reconcile with Table 12-29 [APP-048] which suggests no significant construction traffic vibration effects?
Q2.13.10	The applicant	**Location of access roads** Given SNC concerns [RR-1795] relating to noise from construction access roads within 30m of dwellings, can you comment on the request that access roads should not be located any closer to residential dwellings than this distance, whether acoustic barriers in relation to these access roads would always be used during construction, and whether this should be secured in a document or the dDCO?
Q2.13.11	The applicant	**Public rights of way - noise emissions** Does the noise assessment for PRoW take into account all noise emissions, noting that paragraph 12.4.1 of ES chapter 12 [APP-048] states 'all plant operating simultaneously', however in paragraph 12.8.61 it suggests noise emissions from the solar inverters has been assessed on PRoW. Can you confirm all noise sources operating simultaneously have been taken into account on PRoW (i.e. including solar tracking motors, inverters, substations etc).

ExQ2	Question to:	Question:
Q2.13.12	a) South Norfolk Council b) The applicant	**Public rights of way - operation** a) SNC: Are you satisfied with the measures set out in table 3.7 of the oOEMP [REP2-012] in relation to PRoW, including the commitment that the 'overall sound level from the scheme along the PRoW will not exceed 55 dBA, and will be mitigated where practicable to not exceed 50 dBA'? b) The applicant: Can you explain whether sound levels up to 55dBA at a medium sensitivity receptor result in a medium magnitude of impact and therefore a moderate adverse effect which is significant, with reference to table 12-14 of ES chapter 12 [APP-048]?
Q2.13.13	The applicant	**In-combination effects** Table 19.1 of ES chapter 19 [APP-055] includes construction activity vibration and construction traffic noise but does not include construction activity noise and construction traffic vibration. Table 12-29 of ES chapter 12 [APP-048] concludes that there would be a negligible to low magnitude of impact for all four impact types when assessed individually. Can you explain: a) Why are construction activity noise and construction traffic vibration not included in table 19.1? b) Whether the assessment has considered the combined effects of these impacts on receptors, which could experience these impacts at the same time and where this is set out? c) Whether the combined effects would result in a different scale or conclusion on the significance of effect?
Q2.13.14	The applicant	**Horizontal directional drilling** Paragraphs 12.8.14 and 12.8.15 of ES chapter 12 [APP-048] states that horizontal directional drilling (HDD) may need to be undertaken during night-time hours and is expected to run for periods of up to two days. a) In what circumstances and with what justification would HDD be expected to occur outside of daytime construction hours? b) Within the two-day period stated above, how long would the noisiest periods of HDD be expected to last? c) In relation to HDD, the oCEMP states that temporary acoustic barriers will be installed 'where appropriate'. When would their use not be appropriate? d) Can you clarify whether any additional or updated document(s) identifying the noise sensitive receptors described in tables 2.10 and 2.11 ES Volume 2, appendix 12.2 [APP-179] and missing from ES chapter 12 [APP-048] were submitted at deadline 2, and if not ensure this is submitted at deadline 3 along with any updates to the tables in appendix 12.2 and the ES chapter.
14. Safety, fire risk and major accidents		
Q2.14.1	The applicant	**BESS design certainty** The Outline Battery Safety Management Plan (oBSMP) [REP1-066] indicates that the final battery technology, enclosure configuration and detailed fire protection measures would be confirmed post-consent, with detailed assessment to be undertaken following system selection. The oBSMP [REP1-066] relies upon the future selection of the BESS technology and subsequent detailed design. Having regard to the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Institute for Sustainability and Environmental Professionals (ISEP) guidance document Major Accidents and Disasters in EIA: A Primer: a) identify all elements of the BESS fire-safety assessment which remain dependent upon future design decisions. b) provide a schedule of all post-consent studies, testing, modelling and design activities necessary to confirm the acceptability of the BESS fire strategy. c) explain how the ExA can be satisfied at the point of determination that the final BESS design would not give rise to materially greater risks than those assessed in the application documentation. d) identify the specific provisions within the dDCO [REP1-014] which would prevent BESS construction should those future studies demonstrate that additional land, greater separation distances or alternative mitigation measures are required.
Q2.14.2	a) to h) The applicant d) Norfolk Fire and Rescue Service	**BESS fire, public health and emergency response** The applicant concludes within the ES [APP-054] and the oBSMP [REP1-066] that significant adverse effects on human health, public safety, groundwater resources and the wider environment would not arise from a battery fire event associated with the proposed BESS. The ExA notes that aspects of the final battery technology, enclosure design, emergency response arrangements and operational mitigation remain subject to future design and approval processes.

ExQ2	Question to:	Question:
		Having regard to [APP-054], [REP1-066], and the dDCO [REP1-014], provide: a) details of the thermal runaway and fire scenario(s) relied upon within the assessment, including evidence that the assessed scenario remains representative of a reasonable worst-case event where the final battery chemistry, enclosure design and associated fire characteristics remain subject to detailed design. b) a justification of the assumptions adopted regarding the generation, dispersion and potential off-site effects of smoke, toxic fire effluent, hydrogen fluoride (HF), carbon monoxide and any other relevant combustion products, including any uncertainties associated with emissions datasets, modelling inputs and future battery technologies. c) evidence demonstrating that all relevant receptors have been appropriately assessed, including nearby residential receptors, users of PRoW and any other potentially sensitive populations. The response should identify the assumptions adopted regarding exposure, public access, evacuation, temporary route closures, public notification arrangements and separation distances. d) the emergency response assumptions relied upon in reaching the conclusions of the assessment, including responder attendance times, firefighting strategy, water supply requirements, operational resources, site access arrangements and any constraints identified through engagement with Norfolk Fire and Rescue Service. The response should identify the extent to which those assumptions have been agreed and explain any aspects that remain unresolved. e) the calculations, assumptions and evidence underpinning the proposed firewater containment strategy and containment capacity identified within [REP1-066], including firefighting duration assumptions, rainfall allowances, contaminated runoff generation rates, available freeboard assumptions and contingency arrangements in the event that containment capacity is exceeded. f) an explanation of how the assessment has considered the potential for contaminated firewater and associated pollutants arising from a BESS fire to affect groundwater, surface water, controlled waters, private water supplies and other dependent receptors. The response should identify credible contaminant pathways, contaminants of concern, prevention measures and the evidence relied upon to conclude that unacceptable pollution risks would not arise. g) a schedule of all mitigation, management and operational measures relied upon in reaching the conclusions of the fire consequence assessment, identifying for each measure: i. its purpose ii. the document in which it is contained iii. the mechanism by which it would be secured through the dDCO, oBSMP, Emergency Response Plan or other certified document, and iv. the stage at which compliance would be demonstrated h) a consolidated justification for the applicant's conclusion that residual risks to public health, public safety and the water environment arising from a BESS fire would be acceptable. The response should identify the principal assumptions on which that conclusion depends, any remaining uncertainties and the consequences should those assumptions not be realised in practice.
Q2.14.3	The applicant	**Thermal runaway propagation and large-scale fire testing** The oBSMP [REP1-066] refers to ingress protection testing and future large-scale fire testing. The ExA notes that the battery fire assessment presented within the oBSMP is not based upon a specified installed battery system. Explain: a) how thermal runaway propagation between cells, modules, racks and adjacent containers has been assessed. b) whether the assessment assumes that thermal runaway is confined to a single battery unit or considers propagation beyond the initiating unit. c) the evidence relied upon to demonstrate that the assumed failure scenario represents a reasonable worst-case event. d) what minimum testing standards and performance criteria would be secured through the dDCO [REP1-014] before commencement of BESS construction.
Q2.14.4	The applicant	**Principal aquifer and groundwater protection** Having regard to ES chapter 9 [APP-045], ES chapter 16 [APP-052], Appendix 16.1 [APP-184; APP-185; APP-186] and the oBSMP [REP1-066], please: a) identify all credible pathways by which contaminants arising from a BESS fire, transformer fire or firewater release could reach groundwater receptors. b) explain how those pathways have been assessed where intrusive investigation and detailed design work remain outstanding.

ExQ2	Question to:	Question:
		c) identify any assumptions adopted regarding groundwater conditions. d) explain why the ExA should conclude that residual risks to principal aquifers, private water supplies and connected water environments would be acceptable.
Q2.14.5	The applicant	**Electricity and gas infrastructure interaction** Provide a consolidated assessment of potential interaction between the proposed development and National Gas infrastructure ([RR-1407], [REP1-398], [REP1-092]), including: a) construction risks associated with excavation, piling and cable installation b) operational risks associated with transformer fire, thermal radiation and electrical faults c) consideration of credible domino or escalation scenarios d) engagement undertaken with National Gas e) the mechanisms within the dDCO [REP1-014] which secure any necessary mitigation
Q2.14.6	The applicant	**Climate change and safety systems** The applicant concludes that climate-related major accident and disaster risks are not significant following mitigation, whilst identifying increased risks associated with heat, flooding, extreme weather and wildfire conditions. With reference to ES chapter 6 [APP-042], ES chapter 18 [APP-054], the Flood Risk Assessment [AS-018] and the oBSMP [REP1-066], explain: a) how the resilience of fire detection, suppression, containment and emergency response systems has been assessed during extreme weather conditions b) whether simultaneous events comprising severe weather and safety-related incidents have been considered. c) whether the climate scenarios assessed represent reasonable worst-case conditions over the operational lifetime of the proposed development. d) how the conclusions accord with the expectations of NPS EN-1 in relation to climate resilience and emergency preparedness.
Q2.14.7	The applicant	**Compliance with ISEP Major Accidents and Disasters guidance** The applicant's approach disperses major accident and disaster assessment across several ES chapters rather than presenting a dedicated Major Accidents and Disasters assessment. Provide a compliance matrix demonstrating how the assessment contained within the application documents complies with the principles and expectations of the ISEP guidance document Major Accidents and Disasters in EIA: A Primer, including: a) hazard identification b) vulnerability assessment c) source-pathway-receptor analysis d) reasonable worst-case assessment e) cascading and domino-event assessment f) uncertainty assessment g) mitigation identification and effectiveness h) residual-risk evaluation The matrix should identify the document and paragraph references relied upon for each element.
15. Site Selection and alternatives		
Q2.15.1	The applicant	**Point of connection** The applicant’s site selection evidence explains that the originally preferred point of connection at Norwich Main Substation was discounted and replaced by a connection solution involving a new National Grid Substation at Great Moulton. However, the ExA has not identified a quantified statement of the distance between the original and revised point of connection locations. Provide:

ExQ2	Question to:	Question:
		a) The straight-line distance (in kilometres) between Norwich Main Substation and the proposed National Grid Substation location at Great Moulton. b) The approximate electrical connection route distance (if different). c) An explanation of the significance of this change in point of connection location for: i. site selection; ii. cable routing; iii. environmental effects; iv. commercial feasibility; v. technical feasibility; and vi. the assessment of reasonable alternatives. d) Confirmation as to whether the applicant considers that selection of the point of connection at Great Moulton materially influenced the extent, configuration or geographical distribution of the final scheme, with reasons. This information should be provided with reference to the Site Selection Assessment [APP-215], ES chapter 5 [APP-041], NPS EN-1 paragraphs 4.3.15–4.3.27, NPS EN-3 paragraphs 2.10.13–2.10.18 and relevant NPS EN-5 provisions relating to network connection considerations.
Q2.15.2	The applicant	**Staged selection process** [APP-215] and [APP-041] explain the staged site selection process and the identification of land associated with the eventual grid connection strategy. The original search process was centred on a connection at Norwich Main. Explain, with supporting plans and geographical information systems mapping where appropriate: a) how the geographical extent of the site search area was determined following identification of the Great Moulton connection opportunity; b) whether any alternative search areas were considered at that stage; c) the reasons why the adopted search area was considered appropriate; and d) whether the preferred site would have remained the applicant's preferred option if the site selection exercise had commenced with Great Moulton as the known point of connection.
Q2.15.3	The applicant	**Landowner willingness** The Site Selection Assessment [APP-215] and ES chapter 5 [APP-041] indicate that the identification of candidate sites and the assessment of alternatives were undertaken in the context of land made available by willing landowners, and that a number of potential alternative locations were discounted because land was unavailable or a willing landowner had not been identified. Explain: a) the extent to which landowner willingness and land availability influenced the identification of candidate sites, potential development areas, alternative development zones, National Grid substation options and the point of connection; b) whether any sites, zones or routeing options were excluded from further consideration solely, or primarily, because the relevant landowner was unwilling to participate or no land agreement had been secured; c) whether the comparative assessment of alternatives was undertaken before or after applying any land availability/willing landowner filter; d) whether any potentially preferable alternatives, in environmental, technical, operational or planning terms, were identified but not taken forward because the relevant land was unavailable; and e) how the applicant satisfied itself that the absence of willing landowners did not materially constrain the range of reasonable alternatives considered. In responding, please clearly distinguish between: i. factors relating to land availability, land control and commercial agreements; and ii. factors relating to environmental effects, planning policy, engineering feasibility, operational requirements and grid connection considerations.
Q2.15.4	The applicant	**Alternative cable routes** The Site Selection Assessment [APP-215] and Grid Connection Statement [REP1-072] refer to alternative cable route considerations and infrastructure corridors. The ExA seeks additional clarity regarding the range of realistic alternatives assessed. Provide: a) a schedule of the principal cable route alternatives considered; b) the environmental, engineering and land constraints applicable to each; c) the reasons for rejection; and d) confirmation of whether any additional route options emerged through consultation responses.
Q2.15.5	The applicant	**Cable route corridor** The applicant’s response to action point 24 following ISH1 [REP1-098] states that the cable route corridor from site 7 to site 6 is to route the cables from site 8 and 9 into the 400kV substation in site 5. However, in paragraph 3.2.1 of the Grid Connection Statement [APP-207] it states

ExQ2	Question to:	Question:
		that the substations at sites 4, 7 and 10 would collect electricity from sites 4, 7, 8, 9 and 10 and transform electricity up to a voltage of 132kv and then to site 5. Considering these two statements, can the applicant: a) clarify which of the substations in sites 4, 7 or 10 the electricity generated at sites 8 and 9 would first be collected at; b) provide further evidence to support the position, in response to action point 24, that routing through site 7 would result in electrical inefficiency and the extent of that inefficiency; c) confirm whether following the removal of PV panels from site 6 if there was an updated appraisal of the cable route corridor options and where this is set out in the ES including the environmental, social and economic effects considered for differing routes. If one was not undertaken, can you explain why not.
Q2.15.6	The applicant	**Alternative substation and grid infrastructure locations** [APP-215] identifies a number of alternative substation and grid infrastructure locations which were discounted during site selection. The ExA seeks a clearer understanding of the comparative assessment undertaken. Provide a comparative matrix of the principal substation location options considered, including Newton Flotman, Long Stratton, Tasburgh, Great Moulton Options 4A and 4B (or equivalent option references used by the applicant), identifying: a) environmental factors; b) technical factors; c) commercial factors; d) land availability considerations; and e) the reasons each option was selected or rejected.
Q2.15.7	The applicant	**Avoidance of best and most versatile (BMV) land** Natural England's written representation [REP1-189] identifies outstanding matters regarding agricultural land classification evidence and the extent to which avoidance of BMV land has informed site selection and design evolution. Explain how the results of detailed agricultural land classification surveys altered: a) site boundaries; b) infrastructure locations; c) cable corridor selection; and d) mitigation proposals.
Q2.15.8	The applicant	**Agricultural land quality** The applicant states that agricultural land quality informed site selection and design refinement. However, NCC [RR-1451; REP1-211] and Natural England [REP1-189] continue to raise concerns regarding the extent of BMV land within the proposed development and the alternatives considered. Provide a comparative assessment showing: a) the quantity of BMV land associated with the preferred scheme; b) the quantity of BMV land associated with principal alternative site layouts, configurations or site packages considered; and c) the extent to which avoidance of BMV land influenced site selection decisions.
Q2.15.9	The applicant	**Alternative site configurations** Block East Pye Solar [REP1-389] argues that the alternatives assessment was predicated upon delivery of a fixed 500MW generating capacity and may not have considered whether a smaller or differently configured development could achieve similar objectives with reduced impacts. Set out what consideration was given during project development to: a) smaller generating capacities; b) phased development approaches; c) solar-only development scenarios; d) reduced-scale BESS provision; and e) alternative site layouts resulting in reduced land take. For each option, identify the stage at which it was considered, the assessment undertaken and the principal reasons for its rejection.
16. Socio-economic		

ExQ2	Question to:	Question:
Q2.16.1	The applicant	**Impact of the temporary workforce** Can you explain what consideration has been given to the 'impact of a changing influx of workers', as set out in paragraph 5.13.4 of NPS EN-1 which identifies that this could change the local population dynamics, alter the demand for services and facilities in the settlements nearest to the construction work, and affect social cohesion.
Q2.16.2	The applicant	**Local supply chain** In relation to paragraph 5.13.6 of NPS EN-1 are you able to provide any further detail in the outline Employment, Skills and Supply Chain Strategy (oESSCS) [REP1-070] regarding the local supply chain opportunities and the types of activities, materials and / or components local businesses could be used for and how benefits would be maximised for them? If not, why not?
Q2.16.3	The applicant	**Operation and maintenance – temporary workers and jobs** Can you clarify the relationship between paragraphs 14.8.41 and 14.8.42 of ES chapter 14 [APP-050] in relation to the anticipated replacement working period during the operation and maintenance phase and explain further why one paragraph refers to a 24-month period, whilst the second refers to a 12-month period? Can you also explain how the figures of 129 workers, peak of 240 workers and 120 net direct jobs are arrived at?
Q2.16.4	The applicant	**Skills and the labour market** Given that section 6.2 of the oESSCS [REP1-070] uses phrases such as 'seek opportunities', 'explore' and 'where possible', what certainty can be given that the moderate beneficial effect for skills and the labour market set out in ES chapter 14 will be realised and can be relied upon? Should the wording be more specific, if not why?
Q2.16.5	a) and b) Norfolk County Council, South Norfolk Council, Suffolk County Council b) The applicant	**Outline Employment, Skills and Supply Chain Strategy** Section 8 of the oESSCS [REP1-070] sets out the monitoring, measuring and reporting of the objectives of the strategy. a) Do you have any further comments on the commitments and potential outputs and outcomes to local employment, apprenticeships, skills development, engagement with education providers and supply-chain opportunities? b) What would happen if it was found that the objectives of the final Employment, Skills and Supply Chain Strategy were not being met and should any remedial action be secured?
Q2.16.6	The applicant	**Outline Employment, Skills and Supply Chain Strategy** Can you respond to comments in SCC's LIR [REP1-212] and explain whether or not the oESSCS can be aligned with the Regional Skills Coordination Function in order to engage with further education, higher education and private providers in delivering training opportunities, including the sharing of and communication of workforce requirements and skills gaps to strengthen local supply-chain capacity and timely engagement of businesses in order to enable a coordinated regional approach?
17. Soils and agriculture		
Q2.17.1	The applicant	**Agricultural land classification survey coverage** NE's RR [RR-1410], subsequent submission [REP1-189] and the SoCG [REP1-091] identify continuing concerns regarding incomplete agricultural land classification (ALC) survey coverage, including within the cable route corridor. [APP-051] identifies approximately 158.9ha of the Cable Route Corridor and other smaller areas as unsurveyed. Explain why the ExA can be satisfied that the extent and distribution of BMV land has been adequately established across all order limits for the purposes of environmental assessment and policy compliance. In the event that additional surveys identify a materially greater extent of BMV land than currently assumed, explain whether this could alter the conclusions presented in ES chapter 15 [APP-051].
Q2.17.2	The applicant	**Reliance on worst-case assumptions** The applicant relies on assumptions regarding the agricultural quality of areas not subject to detailed ALC survey [APP-182; APP-051]. Explain why the ExA should rely upon assumed agricultural land grades rather than surveyed evidence when determining the significance of effects on BMV land. Please also explain whether any uncertainty arising from the use of assumptions could materially affect the assessment of BMV loss, mitigation requirements or planning balance conclusions.
Q2.17.3	The applicant Natural England	**Peat identification and protection**

ExQ2	Question to:	Question:
		Natural England's submissions [RR-1410; REP1-189] identify continuing uncertainty regarding the presence, extent and management of peat soils within the proposed development. The applicant and Natural England: Provide an update on the current position regarding peat identification, including whether Natural England is satisfied that peat resources have been adequately surveyed and assessed. In the event that peat deposits are encountered during detailed design or construction, explain what measures would be implemented to avoid, minimise and mitigate impacts and where such measures would be secured.
Q2.17.4	The applicant	**Permanent infrastructure on BMV land** Natural England's RR [RR-1410] and subsequent submissions [REP1-189] raise concerns regarding the siting of permanent infrastructure on BMV land. With reference to substations, BESS infrastructure, access tracks and any permanent landscaping, please identify the extent of permanent BMV land affected by each infrastructure category and explain why alternative locations involving lesser impacts on BMV land were not taken forward.
Q2.17.5	The applicant	**Quantification of permanent BMV loss** Various examination documents identify differing estimates of permanent BMV land loss, including figures of approximately 15.1ha and 37.9ha [APP-051; APP-182]. Provide a single consolidated schedule quantifying permanent and temporary effects on Grade 2 and Grade 3a land by infrastructure type. Explain which figures represent the applicant's final assessment and why the ExA should rely upon those figures when assessing compliance with NPS EN-1 and NPS EN-3.
Q2.17.6	The applicant	**BMV avoidance hierarchy** Interested party submissions, including Natural England and Block East Pye Solar representations [RR-1410; REP1-387; REP1-389], contend that the proposed development has not demonstrated that impacts upon BMV land have been minimised as far as reasonably possible. Provide a clear explanation of how the BMV avoidance hierarchy informed site selection and design evolution, including examples where infrastructure was relocated, redesigned or removed specifically to reduce effects on Grade 2 and Grade 3a land.
Q2.17.7	The applicant	**Restoration to original ALC grade** ES chapter 15 [APP-051] and the Outline Soil Resource and Management Plan [APP-204] conclude that disturbed agricultural land would be capable of restoration following construction and decommissioning. Identify the evidence relied upon to demonstrate that land can be restored to its pre-development agricultural capability and ALC grade, including any relevant comparators, monitoring evidence or restoration trials. Please also explain what criteria would be used to determine whether restoration has been successful.
Q2.17.8	The applicant	**Monitoring, remediation and enforcement** The Outline Soil Resource and Management Plan [APP-204] sets out a high-level approach to soil protection and restoration. Identify the monitoring regime, performance standards, remediation triggers and independent verification arrangements that would apply throughout construction, operation and restoration. Explain where these measures would be secured within the draft DCO.
Q2.17.9	The applicant	**Long-term agricultural productivity** The proposed development could remain in place for a substantial operational period and may include multiple maintenance and replacement activities. Explain how the assessment in ES chapter 15 [APP-051] has considered the effects of construction, operation, maintenance activities, decommissioning and restoration on long-term agricultural productivity. Identify the evidence supporting the conclusion that agricultural productivity would not be materially and permanently diminished.
Q2.17.10	Natural England	**Natural England outstanding concerns** The SoCG [REP1-091] records discussion between Natural England and the applicant regarding soils and agricultural land matters. Identify any issues which remain unresolved and explain whether, in Natural England's view, those matters are capable of resolution during examination. Where concerns remain, please identify the specific additional information or commitments required for Natural England to conclude that impacts on soils, BMV land and agricultural productivity are acceptable.

ExQ2	Question to:	Question:
Q2.17.11	The applicant	**Cumulative effects on agricultural land resources** A number of interested parties have raised concerns regarding the cumulative effects of utility-scale solar development on agricultural land resources and food production within Norfolk. Explain how cumulative effects on BMV land, agricultural productivity and soil resources have been assessed. In particular, explain why the ExA can be satisfied that the cumulative effects of East Pye Solar together with other consented, operational and proposed developments would not give rise to materially greater effects than those assessed in ES chapter 15 [APP-051].
18. Transport and access		
Q2.18.1	The applicant	**Construction route suitability** With reference to the ES Volume 1: chapter 11 – Transport and Access [APP-047], the ES Volume 3: Appendix 11.1 - Transport Assessment [APP-174; APP-175; APP-176; APP-177], the oCEMP [REP1-068], and the NCC RR and LIR ([RR-1451] and [REP1-211]), concerns have been raised regarding the suitability of certain rural roads proposed to accommodate construction traffic. Identify those locations on Hall Lane, Fairstead Lane, Broaden Lane, Bussey's Loke, Fylands Road, Market Lane, Littlebeck Lane, Shotesham Road, Woodton Road and The Green where: • construction vehicle movements are dependent upon mitigation measures, highway improvements, operational controls or constrained vehicle manoeuvres; or • concerns regarding highway safety or route suitability have been raised by interested parties or highway authorities. For each identified location: a) describe the relevant constraint or concern b) identify the mitigation, management measure or operational control relied upon c) explain why the applicant considers the route suitable to accommodate the forecast construction traffic movements d) explain why any residual highway safety effects would not be significant Where the assessment conclusions rely upon management or operational controls rather than the existing characteristics of the highway, explain the extent of that reliance and why those measures can reasonably be expected to remain effective throughout the construction period.
Q2.18.2	The applicant	**Peak construction traffic** The transport assessment [APP-174; APP-175; APP-176; APP-177] presents forecast peak construction traffic levels derived from the proposed construction programme, workforce profile and anticipated material delivery requirements. The ExA notes that construction traffic forecasts are dependent upon programme assumptions and may be affected by factors such as overlapping work activities, resource availability and programme change. Provide further justification that the assessed peak construction traffic scenario represents a realistic and robust worst-case assessment for the purposes of the ES and transport assessment, in doing so: a) identify and explain the assumptions underpinning the forecast peak workforce numbers, staff vehicle movements, heavy goods vehicle movements, delivery schedules and the sequencing of construction activities. b) identify the extent to which the assessed peak traffic scenario assumes concurrent construction activity across different work fronts, compounds, cable routes and generating station infrastructure. c) provide sensitivity testing and/or scenario analysis for reasonably foreseeable circumstances that could increase traffic demand, including (but not limited to) programme delay, construction phase overlap, contractor resource fluctuations, changes to construction sequencing, concurrent abnormal load deliveries, peak material import requirements and any other construction-related activities capable of generating additional traffic movements. d) quantify the traffic levels arising under each sensitivity scenario and explain how these compare with the assessed peak construction traffic scenario presented in [APP-174; APP-175; APP-176; APP-177]. e) explain whether any sensitivity scenario would alter the conclusions reached in respect of highway capacity, junction performance, congestion, route suitability, construction traffic management, amenity impacts or highway safety. f) where no additional or materially different effects are anticipated, provide evidence and justification demonstrating that the conclusions of the assessment would remain valid.

ExQ2	Question to:	Question:
		In addition, identify any monitoring, review or adaptive management measures that would be implemented should actual construction traffic levels exceed those forecast within [APP-174; APP-175; APP-176; APP-177], and explain how such measures would ensure that significant adverse effects would not arise.
Q2.18.3	a) to j) The applicant k) Norfolk County Council (Local Highway Authority)	**Construction heavy goods vehicle management, monitoring and enforcement** The Outline Construction Traffic Management Plan (oCTMP) [REP1-068] identifies a range of construction heavy goods vehicle routing, traffic management and operational control measures intended to minimise construction traffic impacts and maintain highway safety throughout the construction period. The ExA notes that a number of the assessment conclusions appear to rely upon the effective implementation of future management controls rather than solely upon the inherent capacity and geometry of the highway network. Provide further detail regarding the implementation, monitoring, effectiveness and enforceability of the proposed construction traffic management measures. a) Identify all HGV routing, operational and traffic management measures relied upon within the traffic assessment and explain the circumstances in which each measure would be implemented. b) Explain the mechanisms by which compliance with approved HGV routes, timing restrictions and operational requirements would be monitored, recorded and reported, including the use of global positioning system tracking, vehicle telemetry, site access records, marshal reports or other compliance monitoring systems. c) Explain the circumstances in which measures such as one-at-a-time vehicle movements, convoy arrangements, holding areas, temporary traffic control, traffic marshals, banksmen, escort vehicles or other operational controls would be deployed, and identify the locations to which such measures would apply. d) Explain how contractors, subcontractors and delivery operators would be made aware of, and required to comply with, the approved routing strategy and associated traffic management requirements. e) Set out the process for receiving, recording, investigating and responding to complaints from local residents, highway users and other stakeholders concerning construction traffic movements or highway safety issues. f) Identify the corrective actions available where non-compliance is identified, including repeat route deviations, failure to comply with operational restrictions, unsafe driving practices or other breaches of approved traffic management measures. g) Explain how unforeseen highway safety issues, localised congestion, vehicle conflicts or other construction traffic-related effects would be identified, assessed and addressed during the construction period, including any review or escalation procedures. h) Identify any performance indicators, trigger levels or monitoring thresholds that would prompt the implementation of additional mitigation measures. i) Confirm how the proposed requirements would be secured, monitored and enforced through the rDCO, Construction Traffic Management Plan, contractor obligations or any other relevant control document. j) Identify the transport and highway performance indicators that would be monitored throughout construction, together with reporting arrangements, trigger thresholds, review mechanisms involving NCC and other highway authorities, and the process for implementing additional mitigation where monitoring identifies unforeseen or greater-than-assessed impacts. k) The applicant and NCC are also requested to explain the extent to which the conclusions of the traffic assessment depend upon the successful operation of these management measures and to provide justification that they can reasonably be expected to remain effective, proportionate and enforceable throughout the construction period.
Q2.18.4	a) to j) The applicant k) Norfolk County Council (Local Highway Authority) and National Highways)	**Abnormal indivisible load (AIL) movements** The ExA notes that construction of the proposed development would require the delivery of AILs, including oversized and potentially heavy components. Representations received during the examination have raised concerns regarding the suitability of the proposed highway network for such movements and the potential for temporary impacts on highway users, local communities and highway infrastructure. In addition, the extent of any required mitigation, temporary highway interventions and contingency arrangements is not yet fully clear from the submissions before the examination. Provide an updated assessment of all anticipated AIL movements associated with the proposed development and explain how such movements can be accommodated without giving rise to significant adverse effects on highway safety, network operation or local amenity. The response should:

ExQ2	Question to:	Question:
		a) identify all anticipated AIL types, including the components to be transported, the maximum anticipated dimensions, weights, vehicle configurations and the forecast number and frequency of movements. b) confirm the proposed delivery routes from the strategic highway network to the proposed development and identify any route sections that remain subject to further assessment, agreement or refinement. c) With reference to the route constraints, mitigation measures and access strategy matters discussed between the applicant, NCC and National Highways [APP-177], and having regard to the Transport Assessment ([APP-174], [APP-175] and [APP-176]), identify those route sections, bends, structures and other locations where the largest anticipated AILs would be expected to require temporary traffic management, require the removal, protection or alteration of highway infrastructure, vegetation clearance, use of land outside the carriageway, or otherwise require specific mitigation measures. For each such location, provide sufficient swept-path analysis or equivalent technical evidence to demonstrate that the anticipated movement can be undertaken safely and efficiently, and explain the extent of any associated highway interventions, stakeholder approvals or other mitigation necessary to facilitate delivery. d) identify any bridges, structures, junctions, traffic signal installations, street furniture, utility apparatus, overhead services, vegetation, PRoW or other highway features that may constrain AIL movements and explain the mitigation measures proposed in each case. e) identify any temporary traffic management measures required to facilitate AIL movements, including road closures, temporary stopping-up, parking restrictions, suspension of on-street parking, convoy arrangements, escort vehicles, temporary traffic signals, marshal control, lane closures or other operational controls. f) identify any highway alterations, temporary engineering works, vegetation clearance, removal or relocation of street furniture, or other physical interventions that may be required to facilitate AIL movements and explain how any affected infrastructure would subsequently be reinstated. g) explain the likely duration, frequency and geographical extent of any temporary effects on highway users, residents, businesses, pedestrians, cyclists, equestrians, public transport services and agricultural operations, and assess the significance of such effects. h) explain how emergency access, public transport operations and normal highway network functionality would be maintained during AIL movements. i) identify the mechanisms by which AIL movements would be planned, coordinated and agreed with the relevant highway authorities, National Highways, emergency services and other stakeholders. j) identify contingency arrangements that would be implemented should a preferred route become unavailable, unsuitable or otherwise constrained at the time of delivery, and explain whether use of any alternative route would result in materially different environmental or highway effects. k) NCC and National Highways are requested to state whether they agree that the information currently before the examination is sufficient to demonstrate that all anticipated AIL movements can be undertaken safely and efficiently, and if not, identify any further work, approvals or assessments considered necessary.
Q2.18.5	a) to f) The applicant e) and f) Norfolk County Council - Public Rights of Way	**Public rights of way, recreational access and user experience** The Outline Public Rights of Way and Permissive Paths Management Plan [APP-203] identifies a number of temporary and permanent effects on PRoW, permissive paths and recreational routes arising from the proposed development. Representations received during the examination have raised concerns regarding potential effects on route continuity, recreational access, user experience and interactions with construction activities, particularly in relation to the Boudicca Way, Via Beata and other promoted recreational routes. With reference to [APP-203], RRs and any SoCG, identify: a) those PRoW, permissive paths and recreational routes where: • closures, diversions or other restrictions are proposed • users would interact with construction traffic or haul route movements • strategic, promoted or long-distance recreational routes would be affected • concerns regarding accessibility, recreational amenity, user experience or safety remain unresolved For each route or location identified, explain: b) the nature of the impact or concern c) the mitigation, diversion, management measure or operational control relied upon

ExQ2	Question to:	Question:
		d) why the applicant considers that safe and reasonably convenient access would be maintained and that any residual effects on accessibility, route continuity, recreational amenity or user experience would not be significant The applicant and NCC are also requested to identify: e) any assessment conclusions that depend upon the successful implementation of mitigation, management measures or user information provision. f) any monitoring, review or corrective measures proposed should actual effects on route users differ materially from those anticipated within the assessment.
Q2.18.6	The applicant	**Cumulative traffic effects** The applicant concludes within the ES Volume 3 Appendix 11.1: Transport Assessment [APP-174; APP-175; APP-176; APP-177] and the ES Volume 1 chapter 11: Transport and Access [APP-047] that cumulative transport effects arising from the proposed development, in combination with other committed developments, would not give rise to significant residual effects. The ExA notes that the transport assessment has been prepared on the basis of assumptions regarding the timing and interaction of other schemes and that the examination is continuing whilst other major infrastructure projects in the region, including National Grid's Norwich to Tilbury project, continue to progress through the planning process. The ExA also notes concerns raised by interested parties regarding the potential for overlapping construction programmes and the resulting effect on rural roads, local junctions and highway safety. With reference to [APP-174; APP-175; APP-176; APP-177], [APP-047], [REP1-068] and any updated cumulative assessment information available since submission of the application, provide an updated cumulative transport assessment reflecting the latest available information concerning the Norwich to Tilbury project and any other relevant committed or reasonably foreseeable developments. The response should: a) identify any changes to cumulative assessment assumptions since submission of the application b) explain the extent to which construction programme overlaps could occur c) assess whether overlapping construction activities could materially alter construction traffic forecasts, heavy goods vehicle movements, junction performance or route capacity d) identify any locations where cumulative highway safety effects could arise e) explain whether the conclusions presented in [APP-174; APP-175; APP-176; APP-177] regarding the significance of cumulative transport effects remain valid
Q2.18.7	a) to e) The applicant f) Norfolk County Council (Local Highway Authority)	**Emergency access** The ExA notes that the proposed development would involve substantial construction activity across a dispersed site area and would require the use of temporary traffic management measures, construction access arrangements and the movement of abnormal or oversized loads as described within the ES Appendix 11.1: Transport Assessment [APP-174; APP-175; APP-176; APP-177] and the oCTMP [REP1-068]. The ExA further notes that the maintenance of access for emergency service providers is an important consideration in determining whether construction traffic arrangements could give rise to unacceptable impacts on highway safety or access. With reference to [APP-174; APP-175; APP-176; APP-177] and [REP1-068], explain how access for emergency service providers would be maintained throughout all stages of construction, including periods involving temporary traffic management, AIL movements, temporary lane restrictions, road closures or other construction-related constraints. a) Identify any sections of highway where emergency access constraints could arise. b) Explain the procedures that would be implemented to ensure emergency vehicles can obtain priority access where required. c) Identify all consultation undertaken with relevant emergency service providers. d) Summarise any comments received from emergency service organisations and how those comments have been addressed. e) Identify any matters that remain outstanding. f) NCC is invited to comment on the adequacy of the proposed arrangements.
Q2.18.8	The applicant	**Operational traffic assumptions** The ExA notes that the oCTMP [REP1-068], the ES Appendix 11.1: Transport Assessment [APP-174; APP-175; APP-176; APP-177] and ES chapter 11: Transport and Access [APP-047] conclude that operational traffic associated with the proposed development would be limited and unlikely to give rise to significant transport effects. The ExA further notes that the assessment appears to be based principally on routine

ExQ2	Question to:	Question:
		maintenance activities and that uncertainty remains regarding traffic associated with infrequent but potentially substantial component replacement activities over the operational lifetime of the proposed development. Provide further justification for the operational traffic assumptions adopted within [APP-202] and [APP-174; APP-175; APP-176; APP-177]. The response should: a) identify the assumptions adopted in relation to routine maintenance traffic b) identify anticipated vehicle movements associated with panel replacement, inverter replacement, transformer replacement and battery energy storage system maintenance activities c) identify any assumptions relating to major component replacement events during the operational lifetime of the proposed development d) explain whether AIL deliveries could be required during operation e) identify any significant but infrequent traffic events excluded from the assessment and justify that approach f) explain why operational traffic effects should continue to be regarded as negligible or not significant
Q2.18.9	a) to f) The applicant g) Anglian Water Services	**Access to utility infrastructure** Anglian Water Services [RR-0114] and the SoCG with Anglian Water Services [REP1-094] identify the presence of operational water infrastructure within and adjacent to the order limits and highlight the importance of maintaining access to those assets for operational, maintenance and emergency purposes. The ExA notes that construction traffic routes, temporary works, crossing points and highway management measures could have implications for access arrangements during construction and throughout the lifetime of the proposed development. With reference to [RR-0114], [REP1-094], [APP-174; APP-175; APP-176; APP-177] and [REP1-068], explain how unrestricted and safe access to existing Anglian Water infrastructure would be maintained during construction, operation, maintenance and decommissioning of the proposed development. The response should: a) Identify all Anglian Water assets requiring operational access within or adjacent to the order limits. b) Explain how construction activities, haul routes, temporary works and traffic management measures would interact with those assets. c) identify any circumstances in which access could be temporarily constrained. d) Explain the procedures that would apply where emergency access to operational water infrastructure is required. e) Identify any protective provisions, agreements or management procedures relied upon. f) Confirm whether any matters remain outstanding between the applicant and Anglian Water Services. g) Anglian Water Services is invited to comment on the adequacy of the proposed arrangements and identify any remaining areas of disagreement.
Q2.18.10	The applicant	**Construction workforce travel** The applicant's assessment of construction traffic effects in ES chapter 11 [APP-047] and ES Appendix 11.1: Transport Assessment [APP-174; APP-175; APP-176; APP-177] relies upon assumptions regarding construction workforce numbers, travel patterns and modal choice. The ExA notes that the forecast level of workforce-related traffic is a key component of the overall construction traffic assessment and associated conclusions regarding highway capacity, congestion and highway safety effects. Whilst the oCTMP [REP1-068] identifies measures intended to manage construction traffic movements, it is not clear to the ExA the extent to which the forecast workforce mode share assumptions are supported by project-specific evidence or secured mitigation measures. Provide further justification for the construction workforce mode share assumptions adopted within [APP-174; APP-175; APP-176; APP-177], including the evidential basis for those assumptions, their relationship to local accessibility by sustainable modes and any benchmarking undertaken against comparable solar NSIP projects. Explain the measures that would be implemented to minimise reliance upon private car travel, including workforce transport strategies, car sharing initiatives, employee shuttle services, worker accommodation assumptions and parking management measures. Identify how such measures would be secured, monitored and enforced throughout the construction period, and whether any sensitivity testing has been undertaken to assess the consequences of higher-than-forecast private car usage.
Q2.18.11	The applicant	**Agricultural access** The proposed development would be constructed across a substantial area of predominantly agricultural land and would require temporary construction activity across multiple land parcels. The ExA notes concerns raised regarding access arrangements during construction, including potential interaction between construction traffic and existing agricultural operations. The ExA also notes that the transport assessment and

ExQ2	Question to:	Question:
		oCTMP are primarily focused on construction traffic associated with the proposed development rather than the continued operation of affected agricultural holdings. Relevant documents include the ES chapter 11 [APP-047], ES Appendix 11.1: Transport Assessment [APP-174; APP-175; APP-176; APP-177], oCTMP [REP1-068], and landowner concerns contained within RRs including [REP1-388] and [REP1-393], where relevant. Explain how existing agricultural operations would be maintained throughout the construction phase, including access to severed land parcels, movement of agricultural machinery, livestock management activities, harvesting operations and seasonal farming requirements. Identify any locations where agricultural access may be temporarily restricted, reduced or diverted and explain the likely duration and significance of such restrictions. Provide evidence demonstrating that construction traffic management arrangements would not give rise to unacceptable effects on the viability, efficiency or safe operation of affected agricultural holdings.
Q2.18.12	The applicant	**Residual effects conclusion** The applicant concludes within ES chapter 11 [APP-047] and ES Appendix 11.1: Transport Assessment [APP-174] that the residual transport and access effects of the proposed development would be acceptable following the implementation of mitigation measures. However, concerns regarding route suitability, highway safety, construction traffic management, PRoW, AILs, cumulative traffic effects and the deliverability of elements of the transport strategy continue to be raised by interested parties, local authorities and prescribed bodies, including within the NCC LIR [REP1-211], Suffolk County Council LIR [REP1-212], relevant representations and SoCG. With reference to ([APP-047], [APP-174; APP-175; APP-176; APP-177], [REP1-068], [REP1-211], [REP1-212]) and all relevant SoCG, provide a schedule identifying each transport and access matter for which disagreement, concern or uncertainty remains regarding the significance, acceptability or effectiveness of the proposed mitigation measures. For each matter identified: a) identify the affected receptor(s), route(s), location(s) or user group(s) b) identify the party or parties maintaining the concern, disagreement or uncertainty c) summarise the nature of the outstanding concern, disagreement or uncertainty d) identify the applicant's assessment of the residual effect and its significance e) explain why the applicant considers the residual effect to be acceptable notwithstanding the concern, disagreement or uncertainty raised f) identify any further mitigation, monitoring, control, management measure, agreement or DCO provision relied upon by the applicant in reaching that conclusion
Q2.18.13	a) to g) The applicant g) Norfolk County Council (Local Highway Authority)	**Permitted preliminary works traffic and access arrangements** Section 3.8 of the PPWEMP [REP2-024] identifies a range of traffic management measures that may be deployed during the PPW, including temporary traffic controls, lane closures, road closures, passing places, traffic marshals and speed management measures. However, the document does not identify the circumstances, locations or anticipated extent of these measures. With reference to [REP2-024] and related transport submissions, provide: a) an estimate of the forecast daily vehicle and heavy goods vehicle movements associated with PPW activities, broken down by principal work type b) the routes anticipated to be used by PPW traffic and the reasons these routes have been selected c) identification of the locations where temporary traffic management measures may be required, including traffic signals, lane closures, road closures, traffic marshal control, speed restrictions or passing place provision d) details of the anticipated duration and frequency of any such measures e) an explanation of how highway safety risks associated with PPW traffic have been assessed, particularly on rural roads, at field access points and where vehicles interact with pedestrians, cyclists, equestrians and agricultural traffic f) details of how compliance with approved routes and delivery restrictions would be monitored during PPW g) confirmation of whether the applicant and NCC consider that PPW traffic would give rise to any materially different effects from those assessed within the ES and Outline Construction Traffic Management Plan, and if not, provide justification for that conclusion
19. Waste and materials		

ExQ2	Question to:	Question:
Q2.19.1	a) and b) The applicant and Norfolk County Council	**Future waste infrastructure capacity assumptions** ES chapter 18 [APP-054] assumes that future landfill and waste management capacity would remain available to accommodate forecast waste arisings during operation and decommissioning. NCC [RR-1451; REP1-211] disputes the assumption that replacement landfill capacity would necessarily become available within Norfolk. a) Confirm whether this matter remains in dispute. b) If so, provide a concise statement of the remaining points of disagreement and explain the implications, if any, for the conclusions of the Waste and Materials assessment.
Q2.19.2	The applicant	**Hazardous Waste Capacity and Cumulative Effects** ES chapter 18 [APP-054] identifies significant cumulative effects on hazardous waste capacity during certain replacement and decommissioning scenarios. a) Explain the principal waste streams and quantities giving rise to these significant effects. b) Explain the assumptions regarding treatment and disposal capacity underpinning the assessment. c) Explain the basis on which the applicant considers that the mitigation measures proposed through future operational and decommissioning waste management planning would be capable of reducing such effects to an acceptable level.
Q2.19.3	The applicant	**Recovery and Recycling Assumptions** The conclusions of ES chapter 18 [APP-054] rely upon high rates of reuse, recovery and recycling for photovoltaic panels, battery storage components and other electrical infrastructure. a) Explain the evidence base supporting the recovery and recycling assumptions adopted. b) Explain the extent to which those assumptions depend on future technologies, treatment facilities or market development. c) Explain whether materially lower recovery rates would alter the significance conclusions reported in the assessment.
Q2.19.4	The applicant	**Management of Damaged and Fire-Affected Batteries** With reference to ES chapter 18 [APP-054], the oOEMP [REP2-012] and the oDEMP [REP2-014], explain how damaged, defective or fire-affected battery units and associated contaminated materials would be classified, stored, transported and managed pending treatment or disposal.
20. Water environment		
Q2.20.1	a) and c) The applicant b) and c) Lead Local Flood Authority (Norfolk County Council)	**Flood risk and climate change: Site-specific surface water flood risk modelling** NCC, acting as LLFA, has raised concerns regarding the Flood Risk Assessment and Outline Surface Water Drainage Strategy ([RR-1451], [REP1-211], [REP1-085], [REP1-052], [REP1-054]), citing unresolved matters relating to flood modelling, flow paths, flood extents, access routes, drainage calculations, infiltration evidence and the demonstration that the proposed development would not increase flood risk on or off site. a) Applicant: Identify each remaining area of disagreement with NCC regarding flood risk modelling, drainage design, infiltration evidence, hydraulic calculations and surface water management, and explain, with reference to the latest modelling outputs and supporting calculations, how the applicant demonstrates that the proposed development would not increase flood risk elsewhere over the operational life of the proposed development, including under climate change scenarios. b) NCC**:** Provide an updated position on whether the additional information submitted at deadline 1 and deadline 2 resolves your concerns and, where concerns remain, identify the specific information, evidence or further work still required before the LLFA could conclude that flood risk and surface water drainage have been adequately assessed. c) Applicant and NCC**:** Update the SoCG [REP1-085] to reflect the current position on all matters discussed above. For each matter that remains unresolved, the updated SoCG should: a) identify the specific issue in dispute; i) summarise the respective positions of the parties; ii) identify any further evidence, information or actions required to seek resolution; and iii) state whether agreement is expected to be reached during the examination.

ExQ2	Question to:	Question:
Q2.20.2	a) The applicant b) Environment Agency	**Flood risk and climate change: Flood Risk, floodplain functionality and major accident resilience** The Environment Agency has raised concerns ([RR-0587], [REP1-191], [REP2-037]) regarding floodplain impacts and the suitability of infrastructure within areas subject to modelled climate change flood events, including Sub-site 8A and potential floodplain storage loss. a) Applicant: Explain how the final design envelope ensures the resilience of solar infrastructure, substations, BESS facilities and associated drainage infrastructure throughout the lifetime of the proposed development when assessed against the latest applicable climate change allowances. Identify any residual flood risks and the measures proposed to manage them. In addition: i. explain whether the proposed development would result in any temporary or permanent loss of floodplain storage or changes to floodplain functionality and, if so, identify whether floodplain compensation is required, the methodology used to quantify the compensation requirement, and how any compensatory flood storage would be secured and maintained. ii. explain how fire-water runoff arising from a BESS fire event would be contained, managed and disposed of to prevent contamination of groundwater, surface water bodies, ordinary watercourses, drainage systems and floodwaters. iii. explain how the proposed fire-water containment, bunding and pollution prevention measures would operate during a concurrent fluvial flood event, including modelled climate change flood scenarios, and demonstrate that such measures would remain effective under those circumstances. iv. identify any residual risks arising from coincident flooding and BESS fire events and explain how those risks have been assessed, mitigated and taken into account within the residual effects conclusions. b) Environment Agency: Provide an update on whether the applicant's post-submission flood risk evidence adequately addresses your concerns regarding climate change flood events, floodplain functionality, floodplain compensation (where required), and the adequacy of the proposed fire-water containment and pollution prevention strategy during both normal operating conditions and flood events.
Q2.20.3	a) The applicant b) Lead Local Flood Authority (Norfolk County Council)	**Surface water drainage and sustainable drainage systems (SuDS): Drainage strategy and infiltration uncertainty** The applicant acknowledges that infiltration testing remains incomplete in parts of the order limits and that drainage design remains subject to further site investigations, whilst NCC has questioned whether sufficient infiltration testing has been undertaken to support the proposed drainage strategy ([AS-018], [REP1-085], [RR-1451], [REP1-211]). a) Applicant: Explain how the ExA can be satisfied that the proposed drainage strategy remains deliverable and effective should future site investigations identify infiltration rates lower than those currently assumed or demonstrate that infiltration is not feasible in some locations. In particular: i. identify the assumptions regarding infiltration performance that have informed the flood risk assessment, drainage strategy and hydraulic modelling. ii. explain whether the proposed drainage system has been designed to accommodate a reasonable worst-case scenario regarding infiltration capacity, including through the provision of attenuation, storage and conveyance infrastructure that would remain effective in the absence of infiltration. iii. identify any implications for attenuation volumes, drainage infrastructure, land take, maintenance requirements, floodplain storage requirements or flood risk management measures should lower infiltration rates be identified through future testing. iv. explain whether sufficient land is available within the order Limits to accommodate any additional attenuation, drainage, flood storage or other surface water management infrastructure that may be required under a worst-case infiltration scenario. v. justify why the completion of infiltration testing and any subsequent drainage design revisions would not materially alter the conclusions of the Flood Risk Assessment, ES or proposed mitigation strategy. b) NCC: Identify whether any additional infiltration investigations remain necessary and explain how the absence of such information affects your ability to support the proposed drainage strategy.
Q2.20.4	The applicant	**Surface water drainage and sustainable drainage systems (SuDS): Sufficiency of drainage information at application stage** The applicant states that elements of the surface water drainage strategy, including final drainage design, discharge locations, hydraulic modelling and calculations, and aspects of the SuDS design, would be developed following the grant of development consent, as part of the detailed design process ([AS-018], [REP2-010], [REP2-012]).

ExQ2	Question to:	Question:
		Having regard to the requirements of NPS EN-1 concerning flood risk and drainage assessment, which require sufficient information to be provided to enable the decision maker to assess the effectiveness and adequacy of proposed flood risk mitigation and drainage measures at the application stage, please: a) identify the drainage design information, calculations and assessments that are currently available and those that would be deferred to the post-consent stage. b) explain why the level of information currently provided is sufficient for the ExA and the SoS to conclude that the proposed drainage strategy would manage surface water runoff appropriately throughout the operational lifetime of the proposed development. c) provide justification for the deferral of any hydraulic calculations, storage volume calculations, attenuation design, discharge rate calculations, discharge location details, exceedance flow assessments and detailed SuDS design work to the post-consent stage. d) explain how the ES, Flood Risk Assessment and Outline Drainage Strategy ([REP1-052], [REP1-054]) demonstrate with sufficient certainty that likely significant effects relating to flood risk, surface water management and the water environment have been fully assessed, notwithstanding the absence of final drainage design information. e) identify the specific parameters, assumptions, design criteria and embedded mitigation measures that have informed the assessment of likely significant effects and explain how these would be secured through the draft DCO and associated certified documents. If the applicant considers that the information currently before the examination satisfies the requirements of NPS EN-1, it should explain why further drainage calculations and design work are not necessary to enable the SoS to reach a reasoned conclusion on the effectiveness of the proposed drainage strategy at the point of determination.
Q2.20.5	The applicant	**Surface water drainage and sustainable drainage systems (SuDS): Existing drainage networks and exceedance flow management** The Flood Risk Assessment and Outline Surface Water Drainage Strategy ([REP1-052], [REP1-054]) identify a range of proposed drainage and SuDS measures across the order limits. a) Explain how existing agricultural drainage systems, field drains, underdrainage networks, ditches, ordinary watercourses, existing outfalls and other local drainage pathways have been identified, mapped and incorporated into the flood risk assessment, runoff calculations, discharge strategy, attenuation design and exceedance flow assessments. b) Provide plans or identify where within the application documents such plans are provided, showing the relationship between the proposed drainage strategy and existing drainage infrastructure, including anticipated discharge points, exceedance flow routes and connections to existing drainage features. c) Explain the assumptions made regarding the location, condition, capacity and operation of existing agricultural and land drainage systems and identify any areas where such information remains uncertain. Where uncertainty exists, explain how this has been taken into account within the assessment of flood risk and drainage performance. d) Explain how exceedance flows arising during construction and operation would be managed to ensure that flood risk, runoff rates or drainage-related effects would not increase on adjacent land, neighbouring receptors, highways, watercourses or drainage infrastructure. e) Explain how the applicant has satisfied itself that the proposed drainage strategy would remain effective in the event that existing agricultural drainage systems or land drainage networks function differently from the assumptions adopted in the assessment. f) Having regard to requirements of NPS EN-1, explain why sufficient information is now available for the ExA and SoS to understand the interaction between the proposed development and the existing drainage network, and to reach a reasoned conclusion on likely significant effects relating to flood risk and surface water management without the need for further post-consent investigation of drainage connectivity or exceedance flow pathways.
Q2.20.6	The applicant	**Groundwater and hydrogeology: Source protection zones, public water supplies and private abstractions** Provide an updated schedule of all public water supply abstractions, private water supplies, source protection zones and other identified groundwater-dependent receptors within, adjacent to or hydrologically connected to the order limits. Explain how each receptor has been assessed, what mitigation would be applied and how such mitigation would be secured In addition, explain how the applicant has satisfied itself that the hydrogeological baseline is sufficiently robust and complete to support the conclusions of the ES and associated water environment assessments, in particular: a) explain the methodology used to identify and characterise public water supplies, private water supplies, source protection zones and other groundwater-dependent receptors

ExQ2	Question to:	Question:
		b) identify whether any such receptors have been identified, amended or removed since submission of the application and, if so, explain the reasons for those changes c) explain whether the identification of any additional or revised receptors would affect the conclusions of the ES, Flood Risk Assessment ([REP1-052], [REP1-054]), Water Framework Directive assessment [REP1-056], hydrogeological assessment or proposed mitigation strategy d) justify why the ExA can be satisfied that all potentially affected groundwater receptors have been identified and appropriately assessed, and that the conclusions of the submitted assessments remain robust.
Q2.20.7	The applicant	**Groundwater and hydrogeology: Groundwater dependent terrestrial ecosystems and Water Framework Directive compliance** The Environment Agency has raised concerns regarding the identification and assessment of groundwater dependent terrestrial ecosystems and related water-dependent ecological receptors ([RR-0587], [REP2-037]). Having regard to those concerns and the conclusions of the Water Framework Directive (WFD) assessment and screening process, explain how the applicant has demonstrated that construction, operation and decommissioning of the proposed development would not result in changes to groundwater levels, groundwater quality, groundwater flows or hydrological connectivity that could adversely affect groundwater dependent terrestrial ecosystems or other groundwater-dependent receptors. In particular: a) identify the evidence relied upon to conclude that no deterioration in the status of any relevant groundwater body would occur. b) explain how the proposed development would not compromise the achievement of applicable WFD objectives. c) justify why no further assessment under the WFD Regulations is required in respect of potential effects on ground water dependent terrestrial ecosystems and associated groundwater-dependent ecological receptors.
Q2.20.8	The applicant	**Groundwater and hydrogeology: Local water supply receptors and water resource demand** Explain whether any private water supplies, private abstractions or locally utilised groundwater resources could experience temporary or permanent effects arising from construction activities, trenching, HDD works, dewatering, changes to drainage patterns, water supply requirements or operational infrastructure. Where uncertainties remain, explain how these have been taken into account within the assessment and residual effects conclusions. In addition, explain how the applicant has identified and quantified the water demand associated with construction, operation, maintenance, landscape establishment, habitat creation, ecological mitigation, dust suppression and any other water-dependent activities throughout the lifetime of the proposed development. Identify the proposed sources of water supply and explain how sufficient water availability has been demonstrated without giving rise to adverse effects on public water supplies, private water supplies, private abstractions, groundwater resources or other water users. Where reliance is placed on assumptions, contingencies or alternative supply arrangements, including the importation of water by road tanker or other means, explain how these have been assessed and whether they would alter the conclusions of the ES, including the assessments of transport and access, landscape and visual effects, ecology, soils and agricultural land, water environment, or the effectiveness of proposed mitigation and enhancement measures. In particular, explain why the ExA can be satisfied that adequate water resources would remain available to support all proposed mitigation, landscaping and habitat establishment measures throughout the construction and operational phases of the proposed development.
Q2.20.9	a) The applicant b) Environment Agency	**Water quality monitoring strategy** The Environment Agency has requested further information regarding monitoring frequency, monitoring duration, monitoring locations, monitoring certification scheme methods and laboratory arrangements, with several matters stated to remain under review [REP1-191]; [REP2-037]. a) Applicant: Provide a consolidated monitoring framework identifying proposed monitoring locations, trigger levels, reporting arrangements, corrective actions and the DCO mechanisms that would secure implementation throughout construction, operation and decommissioning. b) Environment Agency: Identify any remaining deficiencies within the proposed monitoring arrangements.
Q2.20.10	The applicant	**Pollution prevention controls**

ExQ2	Question to:	Question:
		The oCEMP [REP2-010] relies upon pollution prevention measures including fuel management, concrete management, wheel washing, temporary drainage and spill response measures, whilst the Environment Agency has indicated that several pollution prevention matters remain under discussion [REP1-191], [REP2-037]. Explain whether all pollution prevention measures relied upon in the ES assessment are secured through enforceable DCO mechanisms and identify any measures that remain subject to future approval, future design or future agreement.
Q2.20.11	The applicant	**Water Framework Directive (WFD) compliance: WFD assessment completeness** The Environment Agency has identified concerns regarding baseline receptor coverage, missing hydrogeological information, groundwater receptor descriptions and the treatment of certain water-dependent receptors within the Water Framework Directive Assessment [REP1-056], [RR-0587], [REP2-037]. Explain how the Water Framework Directive Assessment demonstrates compliance with the WFD objectives where elements of the baseline assessment remain under revision and provide a clear audit trail showing how each identified receptor has been assessed.
Q2.20.12	a) The applicant b) Environment Agency	**WFD compliance: No deterioration conclusions** The applicant concludes that no deterioration of WFD status would occur, whilst the Environment Agency continues to review updated information relating to groundwater, crossings and construction activities [REP1-056], [REP2-037]. a) Applicant: Provide a receptor-by-receptor explanation of the evidential basis for concluding that the proposed development would not result in deterioration of any WFD quality element during construction, operation or decommissioning. b) Environment Agency: Confirm whether the agency agrees that the no deterioration conclusions are adequately evidenced and identify any outstanding matters.
Q2.20.13	The applicant	**Water Resources: Watering and maintenance of new planting** a) Explain the proposed management and maintenance regime for new planting during the establishment period, including irrigation arrangements, trigger thresholds for watering, drought contingency measures, replacement of failed planting and responsibilities for implementation. b) Does the oLEMP make appropriate provision for securing these measures? c) If not, provide revised oLEMP drafting.
Q2.20.14	a) The applicant b) Environment Agency and the Lead Local Flood Authority (Norfolk County Council)	**Watercourse crossings and hydromorphology: Design certainty and regulatory controls** Whilst the applicant states that several watercourse crossing concerns have been resolved through discussions with the Environment Agency, detailed crossing design remains dependent on subsequent design stages and permitting processes [REP1-087], [REP2-010], [REP2-023]. a) Applicant: Identify all proposed watercourse crossings for which detailed design, hydraulic assessment, engineering specifications, permitting or other approvals remain outstanding. For each crossing, explain how the applicant has assessed, with sufficient certainty, the potential hydromorphological, flood risk, water quality and ecological effects, including effects on ordinary watercourses, in the absence of final design details. The applicant should also identify all future permits, consents and approvals required to implement the crossings, including any environmental permits, flood risk activity permits, ordinary watercourse consents or equivalent regulatory approvals, and explain whether any provisions within the dDCO would disapply, modify or otherwise affect such regulatory controls. The applicant should further explain how the conclusions of the ES would remain valid should subsequent detailed design development or permitting requirements result in amendments to the proposed crossing arrangements. b) Environment Agency and Lead Local Flood Authority: With regard to the proposed watercourse crossings and associated water environment assessment, does the Environment Agency consider that sufficient information has been provided for the ExA to assess the likely hydromorphological, flood risk, water quality and ecological effects of the development? Identify any outstanding concerns regarding future detailed design, permitting requirements or regulatory controls. Where relevant, comment on whether any proposed disapplication or modification of regulatory regimes gives rise to a risk that environmental effects have not been adequately assessed.
Q2.20.15	The applicant	**Watercourse crossings and hydromorphology: Trenchless construction risks** The oCEMP [REP2-010] includes provisions associated with HDD and inadvertent drilling fluid release, whilst concerns remain regarding water quality impacts and groundwater pathways [RR-0587], [REP2-037].

ExQ2	Question to:	Question:
		Explain the evidential basis for concluding that HDD activities and other trenchless techniques would not give rise to significant effects on watercourses, groundwater receptors or WFD status, and identify how those conclusions have been tested under worst-case conditions
Q2.20.16	a) The applicant b) Environment Agency	**Operational water environment effects: BESS and substation firewater management** The Environment Agency continues to seek additional information concerning containment capacity, valve operation, testing, maintenance procedures and the management of contaminated firewater associated with BESS and substation facilities [RR-0587], [REP1-191], [REP2-037]. a) Applicant: Explain how the ExA can be satisfied that firewater and contaminated runoff would be fully contained, monitored, recovered and disposed of in all reasonably foreseeable fire scenarios, including compound failure scenarios and maintenance events. b) Environment Agency: Provide an update on whether the revised submissions resolve the agency's concerns regarding firewater management.
Q2.20.17	The applicant	**Decommissioning effects: Water environment effects during decommissioning** The Environment Agency has previously identified deficiencies in the assessment and mitigation of water environment effects during decommissioning, resulting in revisions to the oDEMP [REP2-014], [REP1-191]. Explain how the decommissioning assessment demonstrates that water environment effects would not exceed those assessed during construction and identify which mitigation measures would remain secured at the decommissioning stage.
Q2.20.18	The applicant Environment Agency	**Statements of common ground: Outstanding matters with the Environment Agency** The applicant and the Environment Agency are requested to update the SoCG [REP1-087] to identify the current position in relation to all matters that remain under discussion, including hydrogeology, groundwater impacts, permitting, firewater management and water quality protection. For each matter that remains unresolved, the updated SoCG should: a) identify the specific issue in dispute; b) provide a brief summary of the respective positions of the parties; c) identify any further evidence or actions required to seek resolution; and d) state whether agreement is expected to be reached during the examination. Where agreement is not anticipated, the updated SoCG should clearly identify the remaining substantive areas of disagreement.
Q2.20.19	The applicant	**Cumulative hydrological effects** Explain how cumulative effects on flood risk, groundwater levels, groundwater quality, private water supplies, receiving watercourses and hydrologically connected ecological receptors have been assessed both within the proposed development and in combination with other existing, permitted and proposed developments. Identify any assumptions made regarding interaction between these receptors and justify why the assessment is considered robust.
Q2.20.20	a) The applicant b) Environment Agency and the Lead Local Flood Authority (Norfolk County Council)	**Flood risk, water environment controls and reliance on subsequent consents** The examination documentation indicates that certain aspects of flood risk management, drainage design, hydrogeological assessment, permitting, monitoring and mitigation remain dependent on future investigations, detailed design and/or regulatory approvals [AS-018], [REP2-010], [REP2-012], [REP2-014], [REP1-087]. a) Applicant: Explain how the applicant considers that the proposed development complies with relevant flood risk and water environment policy requirements notwithstanding the reliance on future investigations, detailed design and subsequent regulatory approvals, in particular: i) identify those elements of the flood risk, drainage, groundwater protection, monitoring and mitigation strategy that are secured through the dDCO, including requirements and any relevant protective provisions. ii) identify those matters that would instead be secured through separate regulatory regimes, permits, approvals or consents. iii) explain how the information currently before the ExA provides a sufficient basis to assess likely significant effects and reach conclusions on the acceptability of the proposed development. iv) explain why the completion of detailed design, further investigations or subsequent approvals would not materially alter the conclusions of the ES or the effectiveness of the proposed mitigation measures. b) Environment Agency and Lead Local Flood Authority:

ExQ2	Question to:	Question:
		Having regard to the dDCO [REP1-014], proposed requirements, protective provisions and relevant regulatory controls, confirm whether you are satisfied that sufficient certainty exists for the ExA to conclude that flood risk and water environment effects can be appropriately managed and that no additional controls, requirements or provisions are necessary.

ExQ2 Annex A: Habitats Regulations Assessment – Applicant and Statutory Nature Conservation Body position summary table

The following table sets out a summary of the ExA's understanding of the applicant's screening exercise and assessment of effects on integrity, and agreement with Natural England (NE) at the time of publication of ExQ2.

Abbreviations used:

LSE	Likely Significant Effect
AEoI	Adverse Effect on Integrity

Key to table:

C	Construction
O	Operation and Maintenance
D	Decommissioning
LSE / AEoI	LSE or AEoI cannot be excluded
No LSE / No AEoI	LSE or AEoI can be excluded
?	Unclear
n/a	Not applicable

Note that the conclusions recorded in the table below apply to impacts from the proposed development alone and in-combination, unless otherwise stated.

European site and qualifying feature(s)	Impact pathway	Applicant's conclusions on LSE			Natural England's conclusion on LSE			Applicant's conclusion on AEoI			Natural England's conclusion on AEoI		
		C	O	D	C	O	D	C	O	D	C	O	D
Norfolk Valley Fens SAC													
i) Annex I habitats including calcareous fens and European dry heaths which support Annex II species Desmoulin's whorl-snail *Vertigo moulinsiana* and Narrow-mouthed whorl snail *Vertigo angustior*.	• Water pollution • Siltation • Inappropriate water levels • Hydrological changes	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	n/a	n/a	n/a	n/a	n/a	n/a
The Broads SAC													
a) Annex I habitats including calcareous fens and nutrient-rich lakes supporting Annex II species including Desmoulin's whorl-snail, Little whirlpool ram's-horn snail *Anisus vorticulus* Fen orchid *Liparis loeselii* and Otter *Lutra lutra*.	• Water pollution • Siltation • Inappropriate water levels • Hydrological changes • Air pollution	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	n/a	n/a	n/a	n/a	n/a	n/a
Broadland SPA													
a) Nationally important numbers of Annex I species Bittern *Botaurus stellaris*, Bewick's swan *Cygnus columbianus bewickii*, Whooper swan *Cygnus cygnus cygnus*, Marsh Harrier *Circus aeruginosus*, Hen Harrier *Circus cyaneus* and Ruff *Philomachus pugnax*.	• Water pollution • Siltation • Inappropriate water levels • Hydrological changes • Changes in species distribution	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	n/a	n/a	n/a	n/a	n/a	n/a
Broadland Ramsar													
a) Annex I habitats including calcareous fens supporting Annex II species including Desmoulin's whorl-snail, Fen orchid and Otter. b) Assemblages of rare plants and invertebrates including nine British Red Data Book plants and	• Water pollution • Siltation • Inappropriate water levels • Hydrological changes • Changes in species distribution	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	**No LSE**	n/a	n/a	n/a	n/a	n/a	n/a

136 British Red Data Book invertebrates. c) Species/populations of international importance, including Bewick's swan, Eurasian wigeon *Anas penelope*, Gadwall *Anas strepera strepera* and Northern shoveler *Anas clypeata*.	• Air pollution												