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High Grove Solar Preliminary Environmental Information Report Appendix 4.2 Planning Inspectorate Scoping Opinion

April 2025

The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed High Grove Solar

Case Reference: EN0110010

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

17 October 2024

TABLE OF CONTENTS

1. INTRODUCTION 1

2. OVERARCHING COMMENTS 3

2.1 Description of the Proposed Development 3
2.2 EIA Methodology and Scope of Assessment 6

3. ENVIRONMENTAL ASPECT COMMENTS 9

3.1 Agricultural land and soils 9
3.2 Air Quality 12
3.3 Biodiversity 15
3.4 Climate Change 21
3.5 Cultural Heritage and Archaeology 22
3.6 EMF 24
3.7 Glint and Glare 25
3.8 Ground Conditions 26
3.9 Human Health 29
3.10 Landscape and Visual 30
3.11 Major accidents and disasters 31
3.12 Noise and Vibration 32
3.14 Socio-Economics 34
3.15 Traffic and Transportation 36
3.16 Water Resources and Flood Risk 39
3.17 Cumulative and in-combination effects 42

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

1.0.1 On 06 September 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed High Grove Solar (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110010/documents

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

ID	Ref	Description	Inspectorate's comments
2.1.1	Section 2.2.2, paras 2.4.1.2 and 2.4.6.2	Maximum design parameters	At this stage of development, the number and locations of project elements such as Battery Energy Storage Systems (BESS) and on-site substation(s) have not been determined. The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters / commitments that have informed the assessment.
2.1.2	Para 2.4.1.2	Panels	The Scoping Report states that there are two options for the proposed panels: static or tracking. The Inspectorate recommends that this decision is made prior to submission of the DCO application. If this is not possible, the ES should identify and assess the worst-case scenario for applicable topics (including Landscape and Visual, Cultural Heritage and Glint and Glare) during operation. The ES should consider the potential for tracker panels to cause noise emissions which could be perceptible to sensitive receptors and should either assess these accordingly

ID	Ref	Description	Inspectorate's comments
			where significant effects are likely to occur, or provide evidence of noise emission levels to demonstrate that significant effects would not occur at sensitive receptor locations.
2.1.3	Para 2.4.7.2	400kV substation	The Scoping Report states that the 400kV substation may be *"located in an area outside of the current draft Order Limits or being excluded from the proposed application for development consent with planning consent sought separately*". This Scoping Opinion has been prepared on the basis that the 400kV substation is to be located within the scoping boundary presented (ie the draft Order Limits). The Scoping Report states that the 400kV substation could be located out of the current draft Order Limits. It is unclear from the Scoping Report whether the Order Limits would be revised in this case, however the Inspectorate assumes this is the case. If the 400kV substation is situated outside the current draft Order Limits, the Applicant should carefully consider the scope of assessment and receptors which could potentially be affected. Should the 400kV substation be consented separately, the ES should identify and assess any likely significant effects that could arise from the projects interacting.
2.1.4	Section 2.5.2	Construction	The ES should clearly describe the construction activities insofar as is reasonably possible for all project elements; this will be particularly pertinent for the Noise and Vibration assessment.
2.1.5	Para 2.5.2.6	Construction compounds	Paragraph 2.5.2.6 identifies the need for construction compounds at each Panel Area. The ES should provide details regarding the number, location and dimensions of all construction compounds and access routes. Indicative timescales should be provided for all temporary works. The Applicant should make effort to locate the compounds where existing access to the construction site is available to reduce the need for new accesses and the resultant impacts.
2.1.6	Paras 2.5.2.18 and 18.4.1.5	Construction workers	Paragraph 2.5.2.18 of the Scoping Report states that there would be approximately 300 construction workers employed during the construction phase of the Proposed Development, however paragraph 18.4.1.5 states that up to 240 construction workers

ID	Ref	Description	Inspectorate's comments
			would be employed. The ES should provide consistent details of the anticipated numbers of construction workers required.
2.1.7	Section 2.5.3	Operation	The ES should describe the potential scope and duration of maintenance works that would be required during the operational phase, including predicted vehicle movements and staffing numbers. Details should also be provided on any monitoring to be undertaken.
2.1.8	Sections 14.6.2 & 14.7	Loss of vegetation	The ES should provide clarity on the maximum extent of vegetation loss and demonstrate that the design has sought to avoid or minimise loss. Any likely significant effects (both ecological and in terms of landscape and visual) associated with the temporary or permanent loss of any areas of vegetation should be assessed. The Applicant's attention is drawn to the advice provided by the Forestry Commission. Should any particular pockets of existing vegetation be relied upon to screen any parts of the Proposed Development, the Inspectorate expects their retention to be demonstrably secured.
2.1.9	n/a	Access routes	The ES should describe the proposed site entrance/s and the routes to be used for all vehicular access during construction and operation of the Proposed Development and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential impacts (both positive and negative) associated with any improvements/ changes to the access routes which are either required to facilitate construction of the Proposed Development or are required for restoration purposes on completion of the works. For the assessment of impacts during construction, the ES should explain how the proposed access route(s) relate to sensitive receptors.
2.1.10	n/a	Residues and emissions	Notwithstanding the Inspectorate's agreement to scope out some potential impacts in the tables below, the ES should provide an estimate, by type and quantity, of anticipated residues and emissions resulting from construction and operation of the Proposed Development, as required by Schedule 4(1)(d) of the EIA Regulations 2017.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
2.2.1	Para 2.5.4.3	Decommissioning of the 400kV substation	The Scoping Report assumes that the proposed 400kV substation would be retained as part of the wider grid network by National Grid after the solar farm is decommissioned. Therefore, decommissioning of the proposed 400kV substation would be the responsibility of National Grid and is "*not considered part of the Proposed Development subject to assessment*". If the Applicant can provide certainty within the ES that National Grid would assume responsibility for the 400kV substation and that it would operate in perpetuity, the Inspectorate is content this matter can be scoped out. However, if such reassurances cannot be provided, the Inspectorate considers that the ES should assess the potential impacts of decommissioning of the 400kV substation, where significant effects are likely. The Applicant's attention is also drawn to the comments of Norfolk County Council in respect of the need for clarity in the ES regarding the anticipated lifetime of various assets within the Proposed Development.
2.2.2	Section 4.5.5	Materials and waste	The Scoping Report explains that the construction, operation and decommissioning of the Proposed Development would not result in notable amounts of waste and proposes to scope this matter out of further assessment. It states that the Climate Change chapter of the ES will set out the waste generation assumptions from the construction, operational and decommissioning phases. It further notes that an assessment of potential impact and appropriate mitigation would be covered within the Outline Construction and Decommissioning Environmental Management Plans (oCEMP and oDEMP) and Outline Materials and Waste Management plan (oMWMP). For clarity, the ES should be the means for identifying likely significant effects and the management plans should provide the means to mitigate any such effects. Any potential likely significant effects should be assessed through an appropriate methodology set out within the ES.

ID	Ref	Description	Inspectorate's comments
			Based on the information within the Scoping Report, the Inspectorate does not agree there is sufficient evidence to rule out the potential for significant effects from the Proposed Development alone and cumulatively with other developments during construction and decommissioning. The ES should include an assessment of waste impacts, including from the transport of waste and on waste management facilities, where significant effects are likely to occur. The ES should outline what measures are in place to ensure that panels and any associated components are able to be diverted from the waste chain. Consideration should be given to the potential for waste arising from component replacement during operation.
2.2.3	Paras 2.4.9.4, 6.7.2.2, 7.7.3.9, 9.7.2.2, 11.7.2.2, 13.7.2.2, 16.7.2.2 & 17.7.2.2	Embedded mitigation – buffers	The Scoping Report makes numerous references to an 'appropriate buffer' to mitigate effects eg to properties, heritage assets and ecological receptors. The ES should confirm the buffers) to be employed and demonstrate that they are secured through the site layout and/or relevant management plans.
2.2.4	n/a	Transboundary	The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.

ID	Ref	Description	Inspectorate's comments
			Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Agricultural land and soils

(Scoping Report Chapter 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Para 5.1.1.4 and Tables 5-6 & 22-1	Impacts to agricultural holdings/farm businesses	The Scoping Report states that all "*landowners with farm businesses who are involved in the Proposed Development have signed up by voluntary agreement and have therefore considered the potential effects on the overall viability of their farm businesses*". The Inspectorate is content to scope out this matter, subject to providing evidence of such agreements.
3.1.2	Section 5.6.2 and Tables 5-6 & 22-1	Operational phase impacts	The Scoping Report seeks to scope out effects on agricultural land and soils during the operational phase on the basis that all impacts *"are anticipated to occur in the Construction and Decommissioning phase".* The Inspectorate notes that the impact would first occur during construction, but also that paragraph 5.6.1.2 states the land "*would remain largely unavailable for agricultural production during the lifetime of the Proposed Development*". The Inspectorate is content with the approach of assessing the impact during the phase within which the impact first arises. However, the Applicant should ensure that the ES clearly identifies and confirms the duration of any such impacts that would last beyond the construction phase. The Applicant should ensure that assessing such impacts solely during the construction phase does not underplay the potential duration and consequently, the significance of effect.

ID	Ref	Description	Inspectorate's comments
3.1.3	Section 5.2.2	Surveys	Natural England has advised that a sampling density of at least 1 auger per 2 hectares is preferrable, with an increase to 1 auger per 1 hectare in areas where soils would be permanently impacted or lost, such as around permanent infrastructure.
3.1.4	Para 5.8.1.1	Best Most Versatile (BMV) - baseline	The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the Applicant's discussion of alternatives. The ES should explain the design evolution of the Proposed Development to ensure that preference has been made for brownfield and non-agricultural land where possible. The ES should provide a regional assessment of the cumulative loss of BMV land and assess any significant effects where they are likely to occur.
3.1.5	Para 5.9.1.2	Magnitude of change	The Inspectorate does not understand the statement that "*the guidance categorises the magnitude of change as minor*". Paragraph 5.8.1.1 of the Scoping Report states that there would be the loss of approximately 1,400ha of productive arable land and that this would likely involve areas of BMV land. The amount of BMV land to be affected has not been quantified at this stage, however it appears likely to the Inspectorate that it could equate to more than 5ha (ie the area of agricultural land to be lost to qualify as 'minor' in Table 5-5). The magnitude of change should be determined once the amount of BMV land to be affected is quantified.
3.1.6	Para 5.9.1.3	Significance of effects	Paragraph 5.9.1.3 states that the overall significance of effect would be determined according to the standard significance criteria, provided in Chapter 4 Approach to EIA. The Inspectorate notes that Table 5-5 contains different magnitude criterion to those in Tables 4-3 and 4-4 (ie major/ moderate/ minor/ negligible compared to high/ medium/

ID	Ref	Description	Inspectorate's comments
			low/ very low). The ES should be consistent in its approach to assessing significance or provide clear explanations for any deviations from the standard significance criteria.
3.1.7	n/a	Agricultural field drains	The ES should include an assessment of any likely significant effects on agricultural drainage or the removal of them due to the Proposed Development.

3.2 Air Quality

(Scoping Report Chapter 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Para 6.8.1.3 and Table 6-5	Dust and particulate matter – all project phases	The Scoping Report concludes that subject to the implementation of suitable site-specific mitigation measures through the oCEMP (see Section 6.7), residual significant effects are unlikely. Section 6.9 proposes a construction and decommissioning dust assessment to support the DCO application and to identify site-specific mitigation measures, which would feed into the oCEMP and oDEMP. The Inspectorate agrees that this matter can be scoped out, subject to the provision of the assessment being undertaken in line with relevant guidance and confirming that there is no potential for significant effects. Due consideration should be given within the assessment to Breckland Special Protection Area (SPA) and Breckland Forest SSSI, which are located immediately adjacent to the Proposed Development. Given the nature of the Proposed Development, the Inspectorate agrees that significant effects from dust and particulate matter from the operational phase of the Proposed Development are unlikely and that this matter can be scoped out of further assessment.
3.2.2	Paras 6.4.1.2, 6.8.1.4 & 6.8.1.3 and Table 6-5	Vehicle emissions – all project phases	The Scoping Report proposes to scope out this matter for the construction and decommissioning phases on the basis that the impact of emissions from vehicles at sensitive receptors would not be significant. If the ES can provide evidence that peak construction activity would only be maintained for a few months out of the 24 month construction period, the Inspectorate agrees that significant effects on human receptors are unlikely. This is on the basis of the traffic flow figures provided within paragraph 6.8.1.4 of the Scoping Report ie 60 Heavy Duty Vehicles (HDV) trips (120 movements), up to 60 car sharing trips and 8 LDV trips per

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			day during peak construction, distributed across the network and access points around the draft Order Limits. However, paragraph 6.4.1.2 of the Scoping Report states that the number and distribution of construction traffic on the road network is not yet known and the Inspectorate has commented on construction traffic movement assumptions at ID 3.15.5. The ES should provide confirmation of construction vehicle movements, access points and routes, and confirmation at the application stage that these would not exceed the IAQM screening criteria. Should these be exceeded, an assessment of effects from construction traffic emissions must be presented within the ES. In respect of impacts on ecological sites, the impacts of construction vehicle emissions on designated conservation sites that are sensitive to changes in air quality, including nitrogen and acid deposition, should be considered once construction routes are determined. Confirmation should be provided that traffic movements would not exceed the screening thresholds provided within 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations' (NEA001). Should these thresholds be breached, an assessment of effects should be included in the ES. Information from the Air Pollution Information System (APIS) may be of relevance to this assessment. With regards to operation, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within the guidance) to justify this position.
3.2.3	Para 6.8.2.1 and Table 6-5	Combustion emissions – all project phases	On the basis that no combustion is proposed during any phases of the Proposed Development, the Inspectorate agrees that this matter may be scoped out.

ID	Ref	Description	Inspectorate's comments
3.2.4	n/a	Shared Nitrogen Action Plan (SNAP)	The ES should take account of or SNAPs which may be being developed or implemented to mitigate the impacts of air quality. The Proposed Development falls within the Breckland SNAP area.

3.3 Biodiversity

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Tables 7-9 & 22-1	Designated sites	The Scoping Report concludes that there would be no likely significant effects on the following designated sites due to distance and lack of suitable connecting habitat: ▪ Honeypot Wood, Wendling Special Site of Scientific interest (SSSI); ▪ Narborough Railway Embankment SSSI; ▪ Dereham Rush Meadows SSSI; ▪ Castle Acre Common SSSI; ▪ Bradley Moor SSSI; ▪ Wayland Wood, Watton SSSI; ▪ Great Cressingham Fen SSSI; ▪ River Nar SSSI; ▪ Breckland SAC; ▪ Horse Wood, Mileham SSSI; ▪ Potter's Carr Cranworth SSSI; ▪ Old Bodney Camp SSSI; ▪ Breckland Farmland SSSI; ▪ Hooks Well Meadow, Great Cressingham SSSI; ▪ Mattishall Mall SSSI; ▪ East Walton and Adcock SSSI;

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			▪ Beetley & Hoe Meadows SSSI; ▪ Thompson water, Carr and Common SSSI; ▪ Rosie Curstons Meadow, Mattishall SSSI; ▪ Boughton fen SSSI; ▪ Field Barn Heaths, Hilborough SSSI; ▪ Scoulton Mere SSSI; ▪ Foulden Common SSSI; ▪ Gooderstone Warren SSSI; ▪ East Winch Common SSSI; ▪ River Wensum SAC; ▪ River Wensum SSSI; ▪ Coston fen Runhall SSSI; ▪ Cranberry Rough Hockham SSSI; ▪ Litcham Common Local Nature Reserve (LNR); and ▪ Great Eastern Pingo Trail LNR. It also considers that breeding bird interest features of Dillington Carr, Gressenhall SSSI are unlikely to be impacted given distance and that water and woodland habitats on the site would be retained. The Inspectorate agrees that significant effects on these sites and features are unlikely and that they can be scoped out of further assessment, except River Wensum SAC. The Inspectorate notes that Wendling Beck (a tributary of the River Wensum) bisects the Northern panel areas, and a number of smaller tributaries run through the Eastern panel area and the cable corridors. The ES should assess the potential for significant

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			effects from cable works should these watercourses be hydrologically linked to the SAC. Effects on the River Wensum SSSI should also be assessed, where significant effects are likely. Relevant cross reference should be made to the Water Resources and Flood Risk chapter of the ES.
3.3.2	Tables 7-9 & 22-1	Stanford Training Area SSSI	Table 7.9 states that bats from Stanford Training Area SSSI may forage along the hedgerows on the application site but proposes to scope out the SSSI from further assessment. Neither Table 7-5 or 7-9 identify bats as being a feature of this SSSI, therefore the Inspectorate queries whether this was a drafting error. On the basis that bats are not features of the SSSI, the Inspectorate agrees that significant effects on this site are unlikely and that the site can be scoped out of further assessment.
3.3.3	Para 7.8.1.3	Invasive Non-Native Species (INNS)	The Inspectorate notes that INNS would be managed through measures included in the oCEMP, outline Landscape and Ecological Management Plan (oLEMP) and oDEMP to be submitted with the DCO application and proposes to scope out this matter. However, the Environment Agency has confirmed that it holds records of INNS in proximity to the draft Order Limits. As a result, the Inspectorate does not agree this matter can be scoped out of the ES. The ES should identify the locations of INNS records, assess any likely significant effects and detail and secure mitigation/ biosecurity measures during all phases of the Proposed Development to avoid/control the spread and introduction of INNS. In respect of operation, the Applicant should ensure necessary control and eradication measures are included within the draft/ outline OEMP.
3.3.4	Para 7.9.1.6	Ecological features of negligible or local importance	The Inspectorate agrees that impacts on biodiversity receptors of less than 'Local' importance can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.5	Tables 7-16 & 22-1	Operational effects	Tables 7-16 and 22-1 propose to scope out operational phase effects on: ▪ Statutory designated sites; ▪ Non-statutory designated sites; ▪ Priority habitats including Ancient Woodlands; ▪ Great crested newts; ▪ Riparian mammals (otter and water vole); ▪ Reptiles; and ▪ Badger. However, operational phase effects are scoped in for these receptors in Tables 7-9, 7-10, 7-11, 7-12 and 7-13. No supporting evidence has been provided to justify scoping out operational phase effects on these receptors. Nevertheless, given the nature of the operational phase, the Inspectorate considers significant effects are unlikely for the above listed species, Priority habitats and sites designated for habitats and flora; these can be scoped out of the ES. However, the Inspectorate considers there is a potential for impacts on designated sites with breeding or nesting birds as interest features, including Breckland Special Protection Area (SPA) and SSSI, in terms of disturbance and effects of the loss of functionally linked land (including the loss of foraging resource). The ES should assess these impacts, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.3.6	Para 7.4.1.1	Surveys	The Scoping Report proposes surveys for protected species in the Panel Areas only. The Inspectorate considers that potential impacts on protected species could arise from construction and operation of the substations, BESS and on-site supporting equipment, as well as from construction of the cable connections. It is therefore unclear why the Applicant has chosen not to survey these areas. The Applicant is advised to seek agreement on survey effort with relevant consultation bodies.
3.3.7	Section 7.5.3	Ancient Woodland	The Applicant should monitor the ongoing updates to the Ancient Woodland Inventory described by the Forestry Commission, to inform the environmental baseline in relation to Ancient Woodland.
3.3.8	Tables 7-9 to 7-13	Impacts scoped in	It is not always clear in the Scoping Report which impact(s) will be assessed for which receptor. For example, the phrase "*Potential for adverse impact due to close proximity*" is repeatedly used, but without specifying which impacts would be assessed. The Inspectorate acknowledges the scoping process is early in the assessment process and expects clarity to be provided in the ES in this regard.
3.3.9	Para 2.4.8.1	Operational lighting	The Scoping Report explains that sensor-triggered lighting would be required at the substation for security/safety reasons, although these would not be lit continuously. The ES should assess effects of this lighting on light sensitive species, where significant effects are likely. For the avoidance of doubt, an assessment of effects from construction lighting should also be undertaken, where significant effects are likely.
3.3.10	Table 7-9	Norfolk Valley Fens SAC and Potter & Scarning Fens, East Dereham SSSI	The Scoping Report considers the potential for adverse impacts on Norfolk Valley Fens SAC and Potter & Scarning Fens, East Dereham SSSI due to hydrological connections. Natural England has noted that Potter & Scarning Fens, East Dereham SSSI is a component part of Norfolk Valley Fens SAC and is adjacent to the A47. It notes that the features of the SSSI and SAC may be sensitive to changes in air quality. Air quality

ID	Ref	Description	Inspectorate's comments
			impacts on these sites from construction traffic should be assessed, where relevant vehicle movement thresholds for assessment are exceeded.
3.3.11	n/a	Broads SAC and Broadland Ramsar	The Broads SAC and Broadland Ramsar site have not been identified in the Scoping Report. The Inspectorate considers that further information is required to determine if watercourses present within the study area are hydrologically linked to the sites. The ES should assess the possible effects of cable works upon watercourses linked to these sites, where significant effects are likely.
3.3.12	n/a	Fish	The Scoping Report does not make reference to fish. The Environment Agency notes that the Wendling Beck and River Wissey, both located within the draft Order Limits, present a pathway to fish and have advised that fish surveys be undertaken where cables are proposed to cross watercourses. The Applicant is advised to seek to agree survey effort with the Environment Agency. The ES should detail the baseline and include an assessment of likely significant effects on fish present in chalk rivers. Consideration should be given to noise and vibration during watercourse crossings, impacts of electromagnetic fields (EMF) from buried cables and potential smothering from fine sediment. Alternatively, the ES should provide evidence of subsequent agreement with relevant consultation bodies that significant effects are not likely.

3.4 Climate Change

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 8-8	Climate resilience effects associated with snow and ice, cloud cover and sea level rise.	The Scoping Report explains that the Proposed Development is not located in an area that is susceptible to high levels of snow or cloud cover or sea level rise. The Inspectorate agrees that the Proposed Development is therefore unlikely to be significantly affected by these climate conditions and is content to scope these matters out.
3.4.2	Table 8-9	In-Combination Climate Change Impact (ICCI) assessment – temperature and precipitation change, sea level rise and wind – all project phases	The Scoping Report proposes to scope out an ICCI assessment for all project phases. The Inspectorate agrees that the Proposed Development, in combination with changes in temperature, precipitation, wind patterns and sea level rise are unlikely to result in significant effects upon receptors identified by other environmental disciplines. These matters can be scoped out of the ES.

3.5 Cultural Heritage and Archaeology

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Paras 9.6.1.1 & 9.8.1.1 and Tables 9-7 & 22-1	Direct impacts on heritage assets beyond the draft Order Limits - construction	The Inspectorate agrees that direct effects on heritage assets beyond the draft Order Limits are unlikely to occur. This matter can be scoped out of the ES.
3.5.2	Paras 9.6.3.1 & 9.8.1.1 and Tables 9-7 & 22-1	Indirect impacts to heritage assets outside the draft Order Limits – construction and decommissioning	The Inspectorate considers that the use of temporary compounds, machinery, personnel and lighting has the potential to indirectly impact the setting of designated and non-designated heritage assets during construction and decommissioning of the Proposed Development. However, given the anticipated short duration of the construction and decommissioning stages, significant effects are considered unlikely and the Inspectorate is content to scope this matter out.
3.5.3	Paras 9.6.2.2 & 9.8.2.4 and Tables 9-7 & 22-1	Impacts to buried archaeological remains – operation	The Inspectorate agrees that no impacts are likely from the Proposed Development to buried archaeological remains during the operational phase as impacts would occur during construction. This matter can be scoped out of the ES.
3.5.4	Section 9.6.3 and Tables 9-7 & 22-1	Direct impacts to unknown buried archaeological remains and non-designated	On the basis that direct impacts to potential archaeological resource would have taken placed during construction and that no additional physical disturbance would be caused to any heritage assets through intrusive works during decommissioning, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		heritage assets - decommissioning	The Inspectorate agrees that direct effects on heritage assets beyond the draft Order Limits are unlikely to occur during decommissioning. This matter can be scoped out of the ES.
3.5.5	Para 9.8.2.2 and Tables 9-7 & 22-1	Indirect impacts on non-designated heritage assets – operation	The Inspectorate agrees that significant effects are unlikely given the low importance of the assets and likely degree of harm that could occur through changes in setting alone. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.5.6	Para 9.4.2.1	Study area	Section 9.4 details a study area up to 3km from the draft Order Limits, as defined by the Zone of Theoretical Visibility (ZTV). Section 14.4 in the Landscape and Visual chapter identifies a localised extension of the 3.5km to include views from Castle Acre to the general 3km study area. The Applicant should ensure consistent study areas are applied across these topics and ensure that the study area used in the ES reflects any refinements made to the ZTV further to the inclusion of the substations (as described in paragraph 14.5.2.2).
3.5.7	Para 9.5.2.3	Trial trenching	The Scoping Report proposes pre-consent trial trenching in the Panel Areas only where the geophysical survey has identified notable features or areas of high risk of encountering archaeological remains. Norfolk County Council does not agree with this approach, noting that "*Apparently blank areas as well as areas considered 'high risk' based on the results of geophysical survey also need to be tested*". The Applicant should seek to agree trial trenching effort with relevant consultation bodies.
3.5.8	Para 9.8.2.1	Indirect effects on setting – operation	Consideration should be given to visibility of all project elements that could affect the setting of heritage assets, not just the photovoltaic (PV) modules.

3.6 EMF

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.6.1	Para 10.8.1.1 and Table 10-4	Electromagnetic Fields (EMF) effects – all project phases	The Scoping Report seeks to scope out EMF on the basis that the Proposed Development would comprise underground cables with a maximum voltage up to and including 132 kilovolts (kV). As such, the Scoping Report considers that the Proposed Development would not be capable of exceeding the International Commission on Non–Ionizing Radiation Protection (ICNIRP) exposure guidelines. On the basis that the proposed cables do not exceed 132kV, the Inspectorate is content that an assessment of EMF impacts on human receptors can be scoped out of the ES. However, if the design of the Proposed Development changes and voltages of over 132kV are proposed, this matter must be assessed. Notwithstanding the above, the Inspectorate considers that the ES should assess impacts on fish from cables passing under watercourses, where significant effects are likely. The Applicant is advised to agree its assessment approach with the Environment Agency. It is noted that the 400kV substation location has not yet been identified although it would not be publicly accessible and would be located as far as reasonably possible from existing sensitive receptors. The ES should explain how the siting of the substation has been chosen to avoid adverse impacts on human and ecological receptors. On this basis and subject to the provision of technical reporting to demonstrate that relevant design standards have been met the Inspectorate is content to scope out consideration of EMF from the 400kV substation.

3.7 Glint and Glare

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 11.5.3.8	Receptors north of the draft Order Limits	The Inspectorate agrees that receptors north of the draft Order Limits can be scoped out as they will only have visibility of the backs of the solar PV modules and therefore will not experience glint effects.
3.7.2	Para 11.6.2.3	Transitory vehicles and mobile machinery - construction	The Inspectorate considers that significant effects of glint and glare from transitory vehicles and mobile machinery are unlikely and agrees that this matter can be scoped out of the ES.
3.7.3	Paras 11.8.13 & 11.8.3.4	Reflections from windscreens of vehicles – construction and decommissioning	The Inspectorate agrees that reflections from windscreens of vehicles used during construction and decommissioning are unlikely to result in significant effects and agrees that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.7.4	Paras 11.4.11 & 11.5.3.4	Study area	Paragraph 11.4.1.1 states that airfields within 20km of the draft Order Limits will be considered, however paragraph 11.5.3.4 only considers airfields within 15km. The study area should be consistently applied.

3.8 Ground Conditions

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Section 12.8 and Tables 12-4 & 22-1	Human health – all project phases	The Scoping Report identifies one closed landfill site partially within the cable corridor and two historic landfill sites within, or within 50m of the cable corridor. Paragraph 12.5.3.20 identifies a potential "*risk from leachate contamination and ground gas in relation to the identified historic landfills."* The Scoping Report proposes a 250m offset away from identified landfill areas for substations, the BESS and other associated infrastructure. It is unclear if "*other associated infrastructure"* includes cables. If the ES can confirm that all project elements are located 250m away from landfill sites, the Inspectorate agrees that further assessment of impacts on human health from landfill contamination can be scoped out of the ES. However, the Inspectorate considers that previous agricultural usage does not mean that existing contamination does not exist on-site. Paragraph 12.8.2.1 states that *"any potential contamination would have been appropriately managed during the construction phase",* thus implying there is the potential for contamination. No explanation has been provided as to how this would be managed. A Preliminary Risk Assessment (PRA) has not been submitted with the Scoping Report, so assumptions about existing land contamination have not been verified and the Inspectorate considers that there remains a risk that contamination may be present. Furthermore, the Scoping Report does not explain how unexpected contamination would be dealt with. Until the results and recommendations of a PRA are known, there is insufficient evidence to support scoping this matter out. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies that significant effects are unlikely.
3.8.2	Section 12.8 and	Historic mining legacy – all project phases	At present, the locations of project elements are yet to be determined. The Scoping Report proposes to avoid unspecified mining pits "*as far as practical*", or that an

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Tables 12-4 & 22-1		"*appropriate Ground Investigation will be undertaken prior to construction commencement in locations identified as a potential risk by desktop reporting to understand what these pits now contain, and whether they require any treatment.*" The Inspectorate therefore considers there is insufficient evidence to scope out this matter at this stage. The ES should be supported by a desktop study confirming the locations of known historic mines relative to the Proposed Development. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies that significant effects are unlikely.
3.8.3	Section 12.8 and Tables 12-4 & 22-1	Controlled waters – all project phases	Table 12-4 proposes to scope out impacts on controlled waters. However, this contradicts Table 19-14 where impacts to groundwater quality and quantity have been scoped in for all project phases. With particular reference to the operational phase, paragraphs 12.6.3.1 & 12.8.2.2 consider that the operational phase will not pose impacts to groundwater and surface water quality as it does not represent a potential pollution source. However, paragraph 19.6.2.1 identifies operational risks to the water environment, including from firewater runoff. The Inspectorate therefore does not agree this matter can be scoped out. The ES should include an assessment of effects upon ground water quality and surface water as a result of contaminant leaching, including from firewater drainage and other runoff from the BESS and substations.
3.8.4	Tables 12-4 & 22-1	Ecological receptors/ grazing livestock - operation	Tables 12-4 proposes to scope out impacts on ecological receptors/grazing livestock during the operational phase, although there is no further mention of this matter in the rest of the Scoping Report chapter. The Inspectorate is content that significant effects on grazing livestock from ground conditions are unlikely. However, until the results and recommendations of a PRA are known, the Inspectorate considers there is insufficient evidence to support scoping out potential impacts on ecological receptors. The ES should assess the potential impacts

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			on ecological receptors, or provide evidence of agreement with relevant consultation bodies that significant effects are not likely.

ID	Ref	Description	Inspectorate's comments
3.8.5	Section 12.6.1	Conceptual Site Model (CSM)	The historical smithies noted in Section 12.5.3.1 are not listed as a potential source of impact in the CSM. This should be included within the ES.
3.8.6	n/a	Unexpected contamination	The ES should assess the potential impacts from the discovery of unexpected contamination, where significant effects are likely. Relevant measures for managing unexpected contamination should be identified.

3.9 Human Health

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.9.1	Para 13.9.1.1 and Table 13-4	Assessment of human health effects as a separate ES Chapter	The Inspectorate agrees that a standalone chapter is not required, provided that effects on human health (including impacts on mental health and wellbeing) are considered within other aspect chapters where relevant. The EIA Methodology chapter should provide clear cross-referencing to where the relevant direct and indirect impacts on human health receptors are considered in the ES. Where human health impacts have been assessed in the ES, consideration should be given to relevant guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance for Human Health in Environmental Impact Assessment'.

3.10 Landscape and Visual

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 14.5.3.3	Norfolk Coast National Landscape and Broads National Park	On the basis that these statutory landscape designations are located approximately 25km from the draft Order Limits, the Inspectorate agrees that significant effects are unlikely due to distance and intervening features. These receptors can be scoped out of these ES for all phases of the Proposed Development.
3.10.2	Paras 14.8.1.3 & 14.8.2.2	National Character Area (NCA) 85: The Brecks – all project phases	Although the Proposed Development may appear small in relation to the large scale of NCA85, the Inspectorate notes that approximately one quarter of the Proposed Development would be located within this NCA. The Inspectorate does not consider sufficient evidence has been provided to demonstrate that any physical impacts to features of the landscape would not result in significant effects. Accordingly, the ES should present an assessment of impacts on NCA, or information demonstrating agreement with the relevant consultation bodies that significant effects are not likely.
3.10.3	Para 14.8.1.4	NCA76: North West Norfolk - construction	The Inspectorate notes that there would be no physical impacts to features of NCA76 landscape as it is outside of the draft Order Limits. The Inspectorate agrees that significant effects are unlikely and that NCA76 can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.10.4	Table 14-14	Susceptibility of visual receptors	The definitions provided for the 'Low' and 'Very low' susceptibility criterion are the same. The Inspectorate assumes this to be an error which should be corrected within the ES.

3.11 Major accidents and disasters

(Scoping Report Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Section 15.8 and Tables 15-4 & 22-1	Major accidents and disasters	The Inspectorate notes that potential risks arising during all phases of the Proposed Development are to be considered through other aspect chapters (eg Traffic and Transportation, Glint and Glare, Climate Change and Water Resources and Flood Risk). The Inspectorate agrees that the probability, likelihood and frequency of a major accident or disaster is very low with respect to the Proposed Development and is satisfied that they would be managed under established legislative requirements, the design process or mitigation measures and management plans described in Section 15.7. As such, the Inspectorate agrees that significant effects relating to major accidents and disaster are unlikely and this matter can be scoped out of the ES.

3.12 Noise and Vibration

(Scoping Report Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paras 16.8.1.1 - 16.8.1.5, para 16.8.3.1 and Table 16-9	Noise from construction and decommissioning traffic	The Scoping Report proposes to scope out an assessment of noise impacts from construction and decommissioning traffic on the basis that traffic movements would be temporary and of relatively low volume and intensity. The Inspectorate agrees that significant effects are not likely and that this matter can be scoped out of the ES.
3.12.2	Paras 16.8.1.7 - 16.8.1.9 and Table 16-9	Vibration from construction and decommissioning traffic	The Scoping Report proposes to scope out an assessment of vibration impacts from construction and decommissioning traffic on the basis that perceptible vibration due to traffic only occurs where construction traffic passes very close by and notes that this would only occur for short periods. Subject to confirmation within the ES that construction traffic would not pass in proximity to large numbers of properties or any heritage receptors, the Inspectorate agrees this matter can be scoped out. Should the final traffic routes pass in proximity to large numbers of properties or heritage receptors, the ES should provide an assessment of effects from construction traffic vibration.
3.12.3	Para 16.8.1.10 - 16.8.1.12 and Table 16-9	Vibration from construction activities	Paragraph 16.8.1.10 of the Scoping Report states that building damage is only expected to occur to structures within approximately 10m of a vibration generating activity. Provided that the ES can confirm no buildings would be located within 10m of any construction activities, the Inspectorate agrees that significant effects are unlikely and that vibration impacts on buildings can be scoped out of the ES. On the basis that Best Practicable Means will be included in the oCEMP to manage noise and vibration emissions and given the short duration of construction activities at

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			any one location (less than one month), the Inspectorate is content that significant effects on human receptors are also unlikely and that this matter can be scoped out of the ES.
3.12.4	Paras 16.8.2.7 - 16.8.2.9 and Table 16-9	Noise and vibration from operational traffic	The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.
3.12.5	Para 16.8.2.10 and Table 16-9	Vibration from operational activities	Paragraph 16.8.2.10 of the Scoping Report notes that during operation, plant with moving parts such as cooling equipment and transformers would be mounted on suitable anti-vibration mounts. On this basis, the Inspectorate agrees that significant effects are not likely and this matter can be scoped out of the ES. However, the detailed description of the Proposed Development within the ES should demonstrate that operational plant and equipment (eg substations, battery storage infrastructure, and tracker panel mechanisms) is of a type and to be used in locations that would be unlikely to result in significant vibration effects on sensitive receptors.

ID	Ref	Description	Inspectorate's comments
3.12.6	Figure 16.1	Noise sensitive receptors	Figure 16.1 shows noise sensitive receptors within 500m of the draft Order Limits; these are labelled with 'ESR' followed by a number. At present there is no context as to what the receptors are. The ES should provide a gazetteer identifying the name/type of receptor.

3.13 Socio-Economics

(Scoping Report Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paras 17.8.2.4, 17.8.3.3 & 17.8.4.1 and Table 17-9	Amenity effects related to the local population – all project phases	The Scoping Report states that amenity effects on community facilities during construction would be centred around the town of Swaffham, which has the capacity to support the increase in use, and that visual amenity effects during operation will be considered as part of the landscape and visual amenity assessment. Potential amenity effects associated with decommissioning would be similar to those identified during construction. Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that significant effects are not likely and that these matters can be scoped out of further assessment.
3.13.2	Para 17.8.3.2 and Table 17-9	Land Use – PRoW and recreational resources – operation phase	The Scoping Report explains that potential effects of closures or diversions of PRoWs would be considered during the construction phase and would not be considered further as part of the operational assessment. The Inspectorate is content with the approach of assessing the impact during the phase within which the impact first arises. However, the Applicant should ensure that the ES clearly identifies any such impacts (ie diversions or closures) that would last beyond the construction phase. The Applicant should ensure that assessing such impacts solely during the construction phase does not underplay the potential duration and consequently, the significance of effect.
3.13.3	Para 17.8.2.7 & 17.8.4.1	Land Use – potential indirect effects on commercial receptors, community facilities and	The Scoping Report explains that any indirect effects would be sufficiently dealt with by other assessment chapter such as traffic and transport, noise and vibration and landscape and visual amenity and mitigated through management plans. The Inspectorate is content with this approach. The EIA Methodology ES chapter should

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Table 17-9	development land – all project phases	provide clear cross-referencing to where the relevant socio-economic impacts are considered.
3.13.4	Para 17.8.2.5 & 17.8.2.6 and Table 17-9	Land Use – Development land and allocations (including mineral resources) – all project phases	The Scoping Report explains that development land allocations are outside the draft Order Limits and any indirect impacts will be dealt with by other assessment chapters such as Traffic and Transportation. The Inspectorate is content with this approach. Paragraph 17.8.2.6 of the Scoping Report notes that while parts of the Proposed Development are located within Norfolk County Council's Minerals Safeguarding Areas for Sand and Gravel, mineral deposits would not be permanently sterilised by the Proposed Development and the minerals and waste policies do not currently identify proposals for mineral extraction in the area. On the basis that the mounting structure of the panels would utilise steel poles driven into the ground as 'no dig' form of foundation and that the compacted pad foundation for inverters, transformers and battery storage would be removed at decommissioning, the Inspectorate agrees significant effects on mineral resources are unlikely. This matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.13.5	Section 17.5.3	Baseline	For ease of understanding, the Inspectorate recommends that any static socio-economic receptors identified in Section 17.5.3 are mapped on figures within the ES.

3.14 Traffic and Transportation

(Scoping Report Chapter 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paras 18.8.2.11 & 18.8.2.11 and Table 18-8	Road user safety – all project phases	The Scoping Report states that "*The Proposed Development is not expected to result in changes which could significantly affect accidents and safety during construction because it is an explicit requirement of the highway authorities that any planning application proposals do not unacceptably increase safety risks*". Subject to consideration of Road Safety in the Transport Statement, the Inspectorate is content that this matter can be scoped out of the ES.
3.14.2	Para 18.8.2.12 and Table 18-8	Road safety audits – all project phases	The Scoping Report states that any new or amended access points required to serve the development to/from the public highway would be subject to Road Safety Audit at the appropriate stage and would be considered as part of the Transport Statement. The Inspectorate is content this matter can be scoped out of the ES.
3.14.3	Para 18.8.2.13 and Table 18-8	Hazardous/ large loads – all project phases	On the basis that hazardous loads would not be required, the Inspectorate agrees that impacts from hazardous loads can be scoped out of the ES. However, the Scoping Report identifies the need for Abnormal Indivisible Loads (AILs) during construction. The Inspectorate does not agree this matter can be scoped out at this stage. The ES should assess the potential for increased congestion and increased journey times/distance to road users due to road closures or diversions required for AILs during construction, taking into account the rural nature of some of the access roads. The cumulative effects with other developments in the vicinity should be considered.
3.14.4	Para 18.6.2.1 and 18.6.3.1	Traffic and Transport impacts – operation and decommissioning phases	The Scoping Report states that operation of the Proposed Development is likely to generate very low traffic volumes. On this basis, the Inspectorate is content that this matter can be scoped out of the ES. However, the ES should confirm the operational

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Table 18-8		vehicle types and numbers (with reference to thresholds within relevant guidance) to justify this position. The Scoping Report states that traffic and transport impacts during the decommissioning phase would be equivalent to or less than those during the construction phase and proposes to scope this matter out. Anticipated vehicle movements have not been provided. At this stage, the Inspectorate does not agree that decommissioning can be scoped out given that likely significant effects have been identified for the construction phase. The ES should provide information on traffic and transport impacts during decommissioning based on reasonable assumptions where likely significant effects may occur. It the ES can demonstrate that decommissioning vehicle movements would not exceed the assessment thresholds set out in IEMA Guidelines for the Environmental Assessment of Traffic and Movement (2003), the Inspectorate is content that this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.14.5	Para 18.4.1.5	Construction traffic assumptions	Paragraph 18.4.1.5 of the Scoping Report explains that half of the construction workforce is anticipated to travel to the worksite via car sharing (average two workers per vehicle) and half by mini-bus (15 workers per vehicle). The Inspectorate considers that such assumptions can only be made if there are clear commitments to such vehicle sharing within management plans or through the DCO. If commitment cannot be secured, the assessment of construction traffic should be based on the relevant worst-case (ie the absence of the proposed ride-sharing arrangements).
3.14.6	Para 18.9.1.2	Transport Assessment	The Scoping Report states that it has been agreed with Norfolk County Council that a Transport Assessment would not likely be required and that a Transport Statement would be more appropriate. This has therefore been proposed in the Scoping Report.

ID	Ref	Description	Inspectorate's comments
			The consultation response from the Highway Authority of Norfolk County Council requests that the DCO is supported by a Transport Assessment to assess the effects of the anticipated traffic upon driver delay, severance, pedestrian delay, pedestrian amenity, accidents, road safety and impact from abnormal loads. National Highways has similarly advised a Transport Assessment should be provided. The Applicant is advised to further discuss this matter with Norfolk County Council to seek agreement on the level of information required.
3.14.7	n/a	Emergency services and health facilities	The ES should consider the potential for significant effects associated with any temporary road closures and/or temporary roadworks on emergency services. On the basis that a separate health chapter has been scoped out of the ES (see Table 3.9), the Applicant should ensure that the Traffic and Transportation chapter assesses potential impacts on access to health facilities, where significant effects are likely.
3.14.8	n/a	Water supply	Anglian Water has advised that water demands are served by tanker. The ES should take any such vehicle movements into account in the ES.

3.15 Water Resources and Flood Risk

(Scoping Report Chapter 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	n/a	n/a	n/a

ID	Ref	Description	Inspectorate's comments
3.15.2	Para 19.5.3.37	Flood risk – tributary ordinary watercourse	The Applicant's attention is drawn to the Environment Agency's advice that, if using the Risk of Flooding from Surface Water Mapping as a proxy for fluvial flood risk, it is important to provide supporting evidence that this is a suitable proxy for fluvial flood risk including the effects of climate change, or to undertake detailed hydraulic modelling (particularly for any infrastructure located in these areas such as solar panels, BESS or transformers).
3.15.3	Para 19.6.1.2	Changes in hydromorphology	Paragraph 19.6.1.2 identifies changes in hydromorphology due to loss/ alteration/ degradation of land drainage pathways as a potential risk to the water environment. These geomorphological changes have not been scoped in or out of the assessment in Table 19-8. The potential risks to the geomorphology of the drainage systems and resulting impacts to associated habitats should be scoped in for further assessment, where significant effects are likely.
3.15.4	Sections 19.6.1 and 19.6.2	Water requirements	Section 19.6 identifies the potential for changes to water balance as a result of construction and operational water demand. The ES should provide details of water supply and demand requirements during construction and operation (including in the context of BESS fire risk) and identify the potential sources of supply. An assessment of impacts on water supply has not been proposed in Tables 19-14 to 19-16. This should be provided where there is potential for likely significant effects to occur on water resources, with cross-reference made to the Climate Change chapter

ID	Ref	Description	Inspectorate's comments
			where relevant (or information demonstrating agreement with the relevant consultation bodies that significant effects are not likely).
3.15.5	Section 19.7	Watercourse crossings	The Inspectorate notes that there is potential for trenchless crossing techniques for the cables, including Horizontal Directional Drilling (HDD) to be used to cross watercourses. The ES should assess impacts from any use of HDD on water resource receptors where significant effects are likely. Should drilling fluid be used in construction, a breakout plan should be submitted with and secured within the DCO application.
3.15.6	Section 19.7	Flood Zones	Whilst Section 19.7 states an aim to avoid locating critical infrastructure within Flood Zones 2 and 3, paragraph 19.7.2.3 states that this could take place. If this is the case, the ES should distinguish between flood zones 3a and 3b and specify what infrastructure would be located in which flood risk zones. The ES should explain what mitigation is in place to ensure that the Proposed Development is flood resilient and does not increase flood risk elsewhere.
3.15.7	Section 19.9	Watercourse sensitivity and magnitude of impacts	The Environment Agency has provided comments regarding the proposed approach to determining watercourse sensitivity and magnitude of impacts. The Applicant is advised to seek to agree watercourse sensitivity and magnitude of impact criterion with the Environment Agency.
3.15.8	Para 19.9.1.7	Climate projections	Section 8.9.2.4 states that the 50% probability level will be used to assess the impacts of climate change. In terms of flood risk, the development would be classed as essential infrastructure; climate change should therefore be assessed for the higher central (design case) and upper estimates (sensitivity test) in line with government climate change allowances.
3.15.9	Section 19.10	Limitations	The Environment Agency has highlighted the potential for limitations with its existing hydraulic modelling and flood modelling data. The Applicant should ensure that all data is suitable in line with guidance on undertaking modelling for flood risk assessments available online (Using modelling for flood risk assessments).

ID	Ref	Description	Inspectorate's comments
3.15.10	Tables 19-9 & 7-11	Groundwater recharge	In relation to chalk streams, consideration should be given to impacts on groundwater recharge arising from increased interception from the development.

3.16 Cumulative and in-combination effects

(Scoping Report Chapter 20)

ID	Ref	Description	Inspectorate's comments
3.16.1	Para 20.3.3.8	NSIPs	Norfolk County Council has highlighted Hornsea Project THREE and Sheringham Shoal as projects close to the Necton substations; these should be included in the cumulative effects assessment.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Ashill Parish Council
	Barton Bendish Parish Council
	Bradenham Parish Council
	Beachamwell Parish Council
	Beeston with Bittering Parish Council
	Carbrooke Parish Council
	Castle Acre Parish Council
	Cockley Cley Parish Council
	Cranworth Parish Council
	Dereham Town Council
	Fransham Parish Council
	Great Cressingham Parish Council
	Great Dunham Parish Council
	Gressenhall Parish Council
	Holme Hale Parish Council
	Little Cressingham Parish Council
	Little Dunham Parish Council
	Longham Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Marham Parish Council
	Narborough Parish Council
	Necton Parish Council
	North Pickenham Parish Council
	Ovington Parish Council
	Oxborough Parish Council
	Pentney Parish Council
	Saham Toney Parish Council
	Scarning Parish Council
	Shipdham Parish Council
	South Pickenham Parish Council
	Sporle with Palgrave Parish Council
	Swaffham Town Council
	Watton Town Council
	Wendling Parish Council
	West Acre Parish Council
	Whinburgh and Westfield Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission - East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	East of the Ouse Polver and Nar Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Stringside Internal Drainage Board
	Norfolk Rivers Internal Drainage Board
The relevant Highways Authority	Norfolk County Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The relevant police authority	Norfolk Police and Crime Commissioner
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Norfolk Fire and Rescue Authority

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory Undertaker' is defined in the APFP Regulations (as amended) as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Norfolk and Waveney Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority

STATUTORY UNDERTAKER	ORGANISATION
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Works
	National Gas
The relevant electricity distributor with CPO Powers	Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited

STATUTORY UNDERTAKER	ORGANISATION
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
King's Lynn and West Norfolk District Council
Broadland District Council
North Norfolk District Council
South Norfolk District Council
West Suffolk District Council
Breckland District Council
Mid Suffolk District Council
The Broads Authority
Suffolk County Council
Cambridgeshire County Council
Norfolk County Council
Lincolnshire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bradenham Parish council
Broads Authority
Environment Agency
Forestry Commission
Health and Safety Executive
Little Dunham Parish Council
National Highways
National Highways Historical Railways Estate
NATS
Natural England
Norfolk County Council
Norfolk Rivers Internal Drainage Board
Northern Gas Networks
South Norfolk and Broadland District Council
UK Health Security Agency
West Suffolk Council

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk

Our ref: HighGrove/ ScopingResponse

By Email: Planning Inspectorate
highgrovesolar@planninginspectorate.gov.uk

8th October 2024

Dear Ms. Glassop,

Application by RWE Renewables UK Solar and Storage Limited (the Applicant) for an Order granting Development Consent for High Grove Solar (the Proposed Development)

Thank you for seeking our advice on the Environmental Impact Assessment (EIA) Scoping Report for the High Grove Solar project which is located within the Breckland District of Norfolk.

Anglian Water Services (AWS) is the appointed water and sewerage undertaker for all of the project area shown in Figures 1.1 and 1.2. The following response is submitted on behalf of AWS in its statutory capacity regarding water resources, water supply network, water recycling centres (WRC), water recycling assets and the sewer network, as well as the related role of surface drainage.

The High Grove project is located within the Water Resource Zones (WRZ) of Norfolk East Dereham and Norfolk Bradenham, and designated as being within a 'seriously water stressed' region. In view of the potential impacts on water resources, the Applicant is advised to consider the published Water Resources East Regional Plan which sets out the collective water companies position. The AWS draft Water Resource Management Plan (WRMP) is available on our website Water resources management plan (anglianwater.co.uk). The final WRMP will be published following final determination by Ofwat in December 2024.

The project's EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of Chapter 19 Water Resources and Flood Risk. The WRMP should therefore be added to the data sources listed.

AWS works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect the EIA to include reference to any existing infrastructure managed by AWS and the provision of replacement infrastructure and the requirements for new infrastructure.

AWS works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We

would encourage on-going engagement to ensure that AWS and the Applicant have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination stage.

The Scheme - existing and proposed infrastructure

Reference is made within the Scoping Report to the potential construction of the impacts on existing utility infrastructure and services (sections 2.2.1.2; 2.5.6 and 2.4.9.4). Given the potential location and extent of the proposed development area, there will be existing AWS assets both above and below ground, which serve the surrounding businesses and community. For instance, there are existing AWS assets including several water mains within the project area such as within the highway or its verges which link to the various settlements. Water abstraction locations are also within the project area.

In addition, AWS has sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres/ sewage treatment works), connected to these are pipe connections to the corresponding settlements, including sewers and rising mains which can be in areas beyond the highway verges.

Utilities searches should, therefore, be undertaken to establish the extent of AWS's assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets. AWS would want to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations would enable the Applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

Maps of AWS's underground assets are available to view at the following link: http://www.digdat.co.uk/

For land investigation questionnaires relating to AWS's above ground assets and formal easements, you should contact AWS's estates team on: awsestates@savills.com

Buffers will be required and will inform the construction and operation of the proposed scheme, and its layout and design, following necessary ground investigations. Suitable easements, separation distances and safe working practices will need to be agreed.

The Scoping Report refers to the use of both trenches and trenchless work (section 2.5.2.13) methods for installation of cables. AWS requires the following standoff distances are applied for working each side of the medial line of AWS pipes. This information is taken from our Protective Provisions template which will need to be agreed with AWS for the DCO submission.

(a) 4 metres where the diameter of the pipe is less than 250 millimetres;
(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres; and

(c) A distance to be agreed on a case-by-case basis and before the submission of the plan under sub-paragraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.

AWS WRMP projects

In terms of AWS's WRMP proposed projects, a supply option to provide a new potable water transfer pipeline is planned. The route of this pipeline may be included in the red line boundary of the proposed development. This is to be delivered in the later part of the next asset management period 8 (AMP8 2025-2030) and into AMP9 (2030- 2035). See Section 6.10 -6.11 of the WRMP.

Management Plans

The management plans listed under Section 15.7.4 of the Scoping Report, should include steps to remove the risk of damage to AWS's assets from plant and machinery (compaction and vibration during the construction phase) including haul and access roads. We note vibration from construction traffic has been scoped out (Table 16-9), but this should take account of potential effects on our assets. Further advice on minimising and then relocating (where feasible) AWS existing assets can be obtained from: connections@anglianwater.co.uk

Scheme assessment, design, mitigation and connections

AWS notes the absence of any reference to AWS in the Scoping Report in terms of:

- Whether the management of surface water will require a public sewer connection;
- If water recycling/ sewerage services are required for the construction or operation of the scheme; and
- If a water supply is required for the construction and operation of the scheme.

Drainage and Surface Water

AWS welcomes the statement that the Flood Risk Assessment (FRA) will assess all applicable sources of flooding to and identify any mitigation measures required to ensure flood resilience, taking climate change into account, and to prevent any off-site impacts (section 19.11.1.5 - 19.11.1.10). We consider that this should help to avoid increased risk of ground water infiltration/surface water ingress to our wastewater networks that may lie in the vicinity of the proposed onshore scheme.

The FRA as part of the EIA, should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks, particularly in terms climate change impacts. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Any potential embedded design measures such as Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations. AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems.

Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy. The risk of sewer flooding and any required mitigation within the public sewerage network should form part of an FRA and drainage strategy. AWS would wish to be engaged on the preparation of a drainage strategy and consider that this should be required to demonstrate the appropriate management of run-off from the proposed onshore scheme.

Subject to confirmation that all surface water will be managed following the drainage hierarchy including Sustainable Drainage Systems (SuDS), AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

Further advice wastewater capacity and options can be obtained by contacting the Pre-Development Team at: planningliasion@anglianwater.co.uk

Water resources

As water may be used in the project construction and operation (section 19.6), this indicates that water resources should be assessed in the EIA. Whilst the Water Resources and Flood Risk summary has scoped in all matters considered (Table 19-4), AWS does not consider that sufficient information has been provided to reach a conclusion on the project impacts regarding water supply. Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance. In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply and water resources.

AWS requests that these points are assessed early in the EIA to set out how the project will be supplied with water, the wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets. AWS also requires that the project seeks to minimise its demand for water and records this in the WRA.

AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools,

hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although AWS does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

AWS is currently in the unfortunate position that it needs to limit requests for additional water for process use to up to 20m3/day per site. AWS advises through its Non-Domestic Water Requests Policy (dated December 2024, but currently being further updated) that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth. The flows needed to fill water storage tanks for example (if the Applicant decides not to use rainwater harvesting on site to meet this non potable demand) will need to be assessed by AWS to advise whether a supply is feasible when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

To assess these requests, we require a WRA to be submitted as part of our planning process setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should confirm that there will be no temporary concrete batching facilities (Section 19.6.1) with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk and on the InFlow webpages: InFlow | Development Services (anglianwater.co.uk)

Engagement and next steps

We consider AWS should be included on the list of consultees to be drawn up by the Applicant, as set out in Section 4.9 of the Scoping Report. AWS notes that a statutory consultation on the project is concurrently taking place with a closing date of 18th October which we will responding on.

AWS would welcome engagement with the Applicant throughout the remaining stages of the project to address and resolve issues prior to the submission of the DCO including Protective Provisions. The preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to

reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

We would recommend discussion on the following issues:

1. Impact of development on AWS's water and water recycling assets.
2. The design of the project to minimise interaction with AWS assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the draft EIA.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts (if any) with AWS projects.
6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure AWS's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact Tessa Saunders [redacted]@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,

[redacted]

Phil Jones
Growth Strategy Manager – Sustainable Growth

c.c. RWE Renewables UK Solar and Storage Limited c/o[redacted]@arup.com

BRADENHAM PARISH COUNCIL

[redacted]
[redacted]: info@flyscreenqueen.co.uk

7TH October 2024

Your Ref: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation

Dear Planning Inspectorate

The residents of Bradenham are appalled at your plans to "Industrialise our landscape" encircling our village with solar installations. In particular the installations to the East of the village are too close to housing and need repositioning.

Further to this Bradenham Parish Council is unable to make a subjective assessment as no data has been provided , our concerns are that the electrical noise of Inverters Transformers Batteries and Cooling Fans will be an unacceptable level over the ambient background noise in this rural area. Because of this uncertainty a 5dB limit over the Ambient Background Noise Levels should be a condition of Planning. No outside lighting to be used on the installations as this would affect the rural setting.

This was one of our questions which remains unanswered.

3. What decibel of noise do the inverters make when running at capacity individually and how many inverters will there be per acre.
"Good design and high-quality infrastructure will serve to reduce noise from High Grove at source. However, sound attenuation measures may be incorporated into the design of High Grove to support noise levels to remain under acceptable limits, if required.

Any operational noise produced by High Grove would be by the inverters, batteries or substations, which we typically place away from residential properties. The predicted noise impact of a typical solar farm is considered to be low to negligible, and non-intrusive.

We will undertake an assessment of the potential noise and vibration effects arising from both the construction and operation of High Grove.

Baseline noise survey information from existing background levels will be utilised to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations will been identified and noise impacts on those receptors will be assessed as part of the Environmental Impact Assessment (EIA) process.

At this stage we don’t have details of the number and placement of the inverters and more details of these will be available during the statutory consultation, together with the initial results of the noise assessment."

The other question which we wish to stress.

4. All the access points involve single track lanes, we ask for passing points be created at least 2or3 for each access point.

"This has been noted, however, we also encourage you to include this feedback in your response to the non-statutory consultation."

With particular concern raised on The Grazing Grounds Lane of Southend Road designated as the access point for the Grazing Grounds this is not viable due to its width restrictions and the impact on the residents of Southend. We ask that Green Lane to the west is upgraded for access and ongoing maintenance; no access allowed through Southend Road.

Yours sincerely
Mrs D K Ruppert Clerk to Bradenham Parish Council

From: [redacted]
Subject: Your ref EN0110010 - EIA Scoping Notification and Consultation - High Grove Solar
Date: 07 October 2024 14:51:03
Attachments: [redacted]

> You don't often get email from [redacted]

highgrovesolar@planninginspectorate.gov.uk
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Date: 7 October 2024 Our ref: BA/2024/0328/SCOCON Your ref: EN0110010

Dear Deb Glassop

Application No:		**BA/2024/0328/SCOCON**
Proposal	**:**	**EIA Scoping Notification and Consultation - High Grove Solar**
Address	**:**	**High Grove Solar, , ,**
Applicant	**:**	**Lucia Maclachlan**

I write further to the above proposal. I can confirm that the Broads Authority does not have any comments to make at this stage.

Yours sincerely,

[redacted]

Steve Kenny
Development Manager
[redacted]
[redacted]broads-authority.gov.uk

Broads Authority
Yare House, 62-64 Thorpe Road, Norwich NR1 1RY

The Planning Team has an agile working pattern so are not present in the office at all times. We would recommend that you contact us by email and phone for correspondence as this will enable your enquiry to be dealt with more quickly.

[redacted]

broads-authority.gov.uk
visitthebroads.co.uk
watermillsandmarshes.org.uk
northsearegion.eu/canape

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for people and wildlife

Environment Agency

The Planning Inspectorate	**Our ref:**	XA/2024/100152/01-L01
[via Planning Inspectorate email address highgrovesolar@planning inspectorate.gov.uk]	**Your ref:**	EN0110010
	Date:	08 October 2024

Dear Sir/Madam

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11

APPLICATION BY RWE RENEWABLES UK SOLAR AND STORAGE LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR HIGH GROVE SOLAR (THE PROPOSED DEVELOPMENT)

Thank you for referring the above consultation which was received on 10 September 2024. We have reviewed the High Grove Solar Environmental Impact Assessment (EIA) Scoping Report and Figures and have the following comments to make.

On the whole we are generally satisfied with the proposed scope and content of the Environmental Statement (ES) for the Proposed Development, as set out in the Scoping Report. There are, however, a number of environmental aspects which the report fails to consider either at all or in sufficient detail. These topics are:

- Fisheries
- Biodiversity
- Geomorphology
- Controlled Waters

We have also provided additional comments on topics within our remit for consideration as the proposals are developed, these are included in the appendices. In the future, we would welcome the opportunity to discuss projects based in this area with the applicant to identify potential areas of engagement.

If you have any queries please do not hesitate to contact me.

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for people and wildlife

Environment Agency

Yours faithfully

Ms Chloe Snowball

Planning Advisor – National Infrastructure Team

E-mail: NIteam@environment-agency.gov.uk

Appendix 1: Detailed comments

Appendix 2: Environmental Permitting – Advice to Applicant

Appendix 1

Fisheries

We disagree with the proposed scope of the ES as fish have not been assessed or mentioned in the report. The Wendling Beck and River Wissey are both located within the draft Order Limits which presents a pathway to fish (receptor). Table 7-11 states that chalk rivers are scoped in for further assessment, therefore fish should also be scoped in for further assessment as they are present in chalk rivers (priority habitat).

Baseline Data

The existing baseline data should include existing Environment Agency fish survey data. By our records, European bullhead (*Cottus gobio*) (Annex II Habitats Directive) are present in the River Wissey, and so could be present within the zone of influence (ZoI). Furthermore, European bullhead, brown/sea trout (*Salmo trutta*) (NERC S41 priority species), European eel (*Anguilla anguilla*) (NERC S41 priority species and Eel Regulations 2009) and brook lamprey (*Lampetra planeri*) (Annex II Habitats Directive) are all present within the Wendling Beck, and thus could be present within the ZoI.

Impacts on Fish

We have identified a number of potential impacts on fish as a result of construction, operation and decommissioning. These are as follows and should be scoped in for further assessment within the ES:

- We are pleased to see that trenchless techniques are proposed for watercourse crossings. The impact of noise (associated with vibrations from HDD and piling) on fish should be assessed. Underwater noise or vibration may affect natural migratory fish behaviour, and in extreme situations, kill fish. If it is assumed that noise and vibration from HDD is negligible to fish, this must be supported by evidence.
- The impact from electromagnetic fields (EMFs) on fish due to cables buried under watercourses during operation should be assessed. Studies have found EMFs can affect individual organisms during embryonic and larval stages. For example, brook lamprey spend their juvenile stages on the riverbed, placing them at risk from any localised impacts resulting from increases in EMF due to proximity to buried cables. Consideration should also be given to the potential impact of EMFs on migratory species such as brown/sea trout and European eel. Shielding of cables under the watercourse may offer suitable mitigation.
- During construction and decommissioning, suitable mitigation should be put in place to ensure that runoff from the site does not pollute nearby watercourses. An increase in fine sediment/silt entering watercourses could smother

important spawning gravels, clog interstitial spaces in gravel, impact on fish egg and larval development, and reduce all fish's ability to respire due to clogging of gills. The Construction Environmental Management Plan (CEMP) must detail robust silt control measures such as buffer strips, barriers, Sustainable Drainage Systems (SuDS) ponds, and a method of works which ensures construction is stopped if unacceptable silt runoff were to occur. If necessary, the Ecological Clerk of Works (ECoW) (mentioned in Section 7.7.3.6) should include a watching brief for fine sediment entering watercourses.

- Consideration should be given to fish surveys in instances where cables are proposed to cross watercourses. This detailed baseline data may be required to inform appropriate mitigation.

Legislation

The legislation in Table 7-1 should include the Salmon and Freshwater Fisheries Act 1975 and the Eels (England and Wales) Regulations 2009. By not including this legislation, the legal responsibility on the developer pertaining to this fish specific legislation has not been considered.

Biodiversity

In general, we agree with the biodiversity features scoped in for further assessment. However, there are some additional environmental aspects which we would like to see scoped in.

River Wensum

Table 7-9 states that the River Wensum Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) has been scoped out for construction, operation and decommissioning due to a "lack of suitable connecting habitat". However, the Wendling Beck (a tributary of the River Wensum) bisects the Northern panel area, and a number of smaller tributaries run through the Eastern panel area and the cable corridors. As a result of this connection of pollution pathways, we would wish to see the River Wensum SAC/SSSI scoped in for further assessment.

Invasive Non-Native Species (INNS)

As detailed in Section 7.8.1.3, INNS have been scoped out for further assessment because no records of INNS were found during either the desktop review or the Preliminary Ecological Appraisal (PEA). The Environment Agency holds records of Least duckweed on an ordinary watercourse in the Southern panel area, along with multiple INNS records on watercourses just outside of the draft Order Limits, including American mink, Himalayan balsam, Japanese knotweed and Least duckweed. Due to the proximity of the existing records to the site, there remains a

risk that INNS may be present on the site and therefore they should be scoped in for further assessment.

Separate to the above, we also have the following comments to make.

Biodiversity Net Gain (BNG)

BNG will become a legal requirement for Nationally Significant Infrastructure Projects (NSIPs) in November 2025. It is disappointing that details on BNG are lacking in the scoping report. Section 7.7.3.5 states that the project will "deliver a substantial net gain in biodiversity", but there is no mention of a specific net gain target. Moreover, Section 2.5.2.17 discusses aftercare and maintenance of the landscape, yet there is no mention of a specific length of time in which the habitats will be managed. Please note that a Defra BNG statement is due to be published in September 2024.

A BNG report should be submitted alongside the Development Consent Order (DCO) application which uses the latest statutory (official) version of the biodiversity metric tool to calculate BNG. We would also encourage the use of the Watercourse Metric where appropriate, especially on the Wendling Beck (a chalk stream which falls within the draft Order Limits). We would also deem it necessary to assess river condition and look for opportunities to deliver watercourse units on site, for example watercourses could be enhanced by improving habitat heterogeneity. Any measures to improve the condition of the Wendling Beck and its headwaters would tie in with other restoration schemes and landscape recovery in the wider catchment.

Surveys

It is positive to read that habitat and protected species surveys have already commenced. However, as we have not been provided with a copy of the PEA report or results from the UKHAB or completed species surveys, we are unable to comment on their methodology, results and recommendations (e.g., mitigation) of the surveys. We note that a list of potential mitigation has been provided in Section 7.7.3.6, the EIA should include a confirmed list of proposed site-specific mitigation.

Biodiversity Enhancement

We are pleased to see that a Water Framework Directive (WFD) assessment will be conducted to determine any impacts of the development on the WFD status of waterbodies within the draft Order Limits, as detailed in Section 19.9.1.6. However, we would strongly advise that any biodiversity enhancements to waterbodies complement the local environmental objectives and programme of measures within the River Basin Management Plan (RBMP). In order to understand issues facing the catchment (i.e., barriers to fish and lack of connectivity), consideration should be given to the Broadland Rivers Catchment Action Plan produced by the Broadland Catchment Partnership.

Opportunities for Mitigation and Enhancement

We would recommend that consideration is given to supporting the delivery of local projects such as those identified by the Broadland Catchment Partnership involving the River Yare and River Wensum. Any support would also provide an opportunity to deliver off-site BNG enhancements.

Local projects being delivered within the area include the Wendling Beck Project (which is a DEFRA pilot Landscape Recovery project near Dereham), a structure removal and river re-naturalisation scheme on the Wendling beck at Gressenhall Mill (at Dereham) delivered by the Environment Agency, and an Anglian Water partnership scheme with Norfolk Rivers Trust to create an integrated wetland system near Dereham Sewage Treatment Works (STW), on the Wendling Beck.

Local Nature Recovery Strategy (LNRS)

Norfolk County Council have been appointed the responsible authority to develop the LNRS for this area. Initial mapping has been completed and a map detailing 'Areas of Particular Importance for Biodiversity' has been produced. Consideration should be given to these maps to inform decisions on where to provide off-site BNG delivery and potential enhancements.

Geomorphology

Section 19.6.1.2 identifies changes in hydromorphology due to loss/alteration/degradation of land drainage pathways as a potential risk to the water environment, however these geomorphological changes have not been scoped into or out of the assessment. These potential risks to the geomorphology of the drainage systems and resulting impacts to associated habitats should be scoped in for further assessment.

BNG

All surface waterbodies within a 10m buffer surrounding the draft Order Limits should be assessed for the BNG baseline value (and identifying areas of possible uplift) using accepted methodology (MoRPH survey) carried out by an accredited BNG surveyor.

WFD

It should be noted that WFD regulations apply to all surface waterbodies, not just those designated for monitoring purposes.

Watercourse Crossings

Section 19.6.1.1 mentions that HDD or other trenchless methods may be used for watercourse crossings. We welcome consideration of crossing watercourses using trenchless techniques.

Additionally, Section 2.5.2.6 refers to the installation of culverts during preparatory works. In line with Environment Agency and NPS EN-3 guidance, culverts of existing watercourses should be avoided. Culverting affects natural river processes by restricting flow and causing damage to the riverbed, possibly leading to scour. We would also recommend against the installation of culverts due to their impact on dispersal of some organisms (i.e., certain fish species and otter). If culverts are already present on site, we would recommend these are opened up where possible. If vehicle crossings are required, we would recommend the construction of open-span structures such as bridges.

General Considerations Regarding Watercourse Crossings

The following are general guiding principles that should be considered when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as HDD to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, the active nature of the channel concerned as launch sites for HDD or other trenchless methods should be located to allow natural processes (i.e. channel movement and vertical deepening) to continue without risk of exposing cabling/ducting.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures as part of the design.
- Avoid preventing delivery of mitigation measures. For example, bringing cables to surface level in floodplains earmarked for future river restoration should be avoided.

<u>Protection of Controlled Water - Groundwater and Contamination Issues</u>

We provide the following comments on potential risks to groundwater and contaminated land caused by the proposed development.

The entirety of the draft Order Limits are underlain by chalk bedrock, a Principal aquifer. The east of the site is underlain by superficial alluvium and Lowestoft Formation (diamicton, and sand and gravel), classified as Secondary A and Secondary undifferentiated aquifers. Most of the site is in Source Protection Zone (SPZ) 1, 2 or 3. The West of the site is in a Drinking Water Groundwater Safeguard Zone (designated for nitrate). There are numerous groundwater abstraction licences within the region, including within the draft Order Limits. As such, this is a high sensitivity site.

Firewater Runoff

Section 12.6.3.1 states the operational phase is not considered to affect groundwater, and Section 12.8.2.2 states that the operational phase will pose no further impacts to both groundwater and surface water quality as it does not represent a potential pollution source. We disagree with these assumptions, particularly in consideration of the risks posed by firewater drainage and other runoff from the battery energy storage systems (BESS) and substations. These risks will be greatest during the operational phase. We agree with the operational risks outlined in Section 19.6.2.1 and note that firewater runoff is included here.

Controlled Waters

We are pleased to see that in Table 19-14 groundwater quality and quantity have been scoped in for construction, operation and decommissioning. However, this appears to contradict Table 12-4 where it states controlled waters have been scoped out for further assessment. We request that controlled waters are scoped in for further assessment.

Siting of BESS

Given the sensitive hydrogeological setting, we would likely object to a BESS site anywhere in this development unless there is a sealed drainage system in place to contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site. We note that an Outline Battery Fire Safety Management Plan (oBSMP) is included in the list of proposed management plans in Section 2.6.1.3. We recommend referring to guidance from the National Fire Chiefs Council when designing the scheme: Grid Scale Battery Energy Storage System planning - Guidance for FRS.

Land Use

A Conceptual Site Model (CSM) is presented in Section 12.6.1. This is based on a limited review of historical and current land uses and the site setting. Historical smithies noted in Section 12.5.3.1 are indicative of previous industrial land use, but this is not listed as a potential source. The SPZs and groundwater abstractions

should be included in this list of receptors and a list of private groundwater abstractions should be obtained from the local authorities.

Geo-Environmental Desk Study

The geo-environmental desk study referenced in Sections 19.9.1.1 and 19.9.1.2 should be included in the list of standalone reports and assessments which will support the DCO application found in Section 4.5.6.

Impacts from Construction

Potential impacts from construction are given in Section 12.6.2.1. This list should include spills and leakages during construction. Any chemicals used, including in concrete foundations and piles, must not have the potential to cause damage to the aquifer and SPZs.

Unexpected Contamination

Good practice measures for the construction phase described in Sections 12.7.2 and 19.7.2, and elsewhere in the report, do not include a discovery strategy for unexpected contamination, or a contamination watching brief and action plan. Consideration should be given to this. This could be included within the CEMP and/or Decommissioning Environmental Management Plan (DEMP).

Please note that other schemes in this area have come across contaminated land sites and these may fall within the cable corridor.

Piling

Piled foundations are anticipated for solar panel frames and foundations for the BESS, substations, fencing and infrastructure will be required. Given the sensitive hydrogeological setting, especially within SPZs, a piling method statement and piling risk assessment may be required.

Cables

The type of cables to be used in the scheme have not been specified. We will normally object to fluid filled cables that transport pollutants, particularly hazardous substances that pass through SPZ1 or SPZ2 where this is avoidable. We will also normally object to those which are below the water table in principal or secondary aquifers. Where there is an unavoidable need for fluid filled cables to pass through SPZ1 or SPZ2, operators are expected to adopt best available techniques (BAT) and operate in accordance with the Energy Networks Association Guidance.

HDD

If HDD is used in an SPZ, we would expect this to be supported by a hydrogeological risk assessment to identify any potential risks to groundwater and provide detailed mitigation strategies for any part of the works where there is a risk to the aquifer.

SuDS

SuDS are proposed as a method of managing surface water runoff and maintaining existing site conditions. SuDS must not have a negative impact on groundwater quality, such as by creating pathways for pollutants like oils and chemicals used on site. Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

The Government's expectation is that SuDS will be provided in new developments wherever this is appropriate. We support this expectation. Where infiltration SuDS are to be used for surface runoff from roads, car parking and public or amenity areas, they should:

- Be suitably designed
- Meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)
- Use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

For further information on our approach to groundwater protection, see position statement G13: Groundwater protection position statements - GOV.UK.

Unless the supporting risk assessments show that SuDS schemes in SPZ1 will not pose an unacceptable risk to the drinking water abstraction, we will object to the use of infiltration SuDS under position statement G10: Groundwater protection position statements - GOV.UK.

Hydrogeological Impact Assessment

We disagree with the decision to not include a separate Hydrogeological Impact Assessment as stated in Section 19.9.1.8. For further information on our approach to groundwater protection, see position statement N7: Groundwater protection position statements - GOV.UK.

Authorised Landfill Sites

As stated in Section 12.5.3.16, there is an Environment Agency authorised landfill site Baco – Compac – Chalk farm (*Licence no:* EA/EPR/EP3799NE) within the draft Order Limits. This authorised landfill site is closed but the permit has not yet been

surrendered. Construction works near this landfill must not impact on any landfill leachate or groundwater quality monitoring boreholes that may be associated with the permitted site.

Water Quality

Overall, we support the water quality topics that have been scoped in for further assessment. However, we would like to provide the following advice to aid with an accurate assessment.

Watercourse Sensitivity

Table 19-11 describes the proposed approach to determining watercourse sensitivity. Care must be taken when applying this methodology, as it risks misrepresenting the sensitivity of a watercourse to pollution and changes in water quality. Table 19-11 proposes that a watercourse with a higher Q95 flow is more sensitive than a watercourse with a lower Q95 flow, however the reverse of this is true with regards to water quality, with less dilution meaning a higher sensitivity to change.

Additionally, Table 19-11 proposes that watercourses with a WFD designation are more sensitive than those without a WFD designation. This is inaccurate, as WFD designation is a method of monitoring and classifying the ecological health of the water environment and is not an indication of how sensitive it is to change. When determining the sensitivity of a watercourse, it should be ensured that both professional judgement and the site visit proposed in Section 19.5.2.1 are used when determining the final sensitivity of a watercourse to water quality impacts.

Magnitude of Impacts

Table 19-12 indicates that changes in WFD status are proposed to be used as an example indicator for the magnitude of an impact. Care should be taken when using this approach as it risks misrepresenting impacts from significant pollution and changes in water quality, which can both detrimentally affect local ecology without impacting the WFD status of the overall waterbody. Consideration should be given to the duration, extent and severity of any water quality impacts when determining their magnitude.

Firewater

We are pleased that the risk of firewater release as a potential operational impact has been identified in Section 19.6.2.1. We note that no mitigation has been proposed for this impact at this stage and we would like to flag that we would typically expect some form of firewater containment at BESS and/or substation compounds which are aligned with the proposed firefighting methodology to ensure containment in all scenarios.

Environmental Management Plans

We note that Section 19.7.4.3 proposes to include a requirement within the DCO for the applicant to submit finalised environmental management plans to the relevant planning authority for approval. We should also be included as a consultee during this approval process.

Chalk Streams

The development is proposed to be located within the upper reaches of the River Nar, River Wensum (Wendling Beck), River Wissey and Blackwater River (a tributary to the River Yare), all of which are considered chalk streams with high certainty. These are all highly sensitive habitats whose ecology are known to be heavily impacted and negatively affected by sedimentation. It should be ensured that during all phases of development, but particularly during construction, a strong approach is taken to mitigate against the loss of sediment and to reduce runoff.

There is a Diffuse Water Pollution Plan active on the River Wensum SSSI and for other SSSIs within the River Wensum catchment (such as Potter and Scarning Fen) which the applicant may need to be aware of.

Water Resources

Water Demands

We are pleased to see that potential changes to water balance as a result of water demands during construction, operation and decommission are all scoped in. However, is not specified what these particular demands are, and clarification should be provided on this. The consumptive use of water in all phases of the development is not described and subsequently potential sources of supply for water demands have not been identified.

Common water demands for developments of this scale include (but are not limited to) dust suppression; HGV/machinery wheel wash; concrete batching; potable/domestic supply to welfare stations; bentonite mixing for HDD.

Water Stress

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - 2021 classification - GOV.UK). Some water companies are already unable to supply new non-domestic demands in targeted areas of East Anglia. We recommend that the availability of supply to any non-domestic development be explicitly checked by the applicant with the water company.

Licences

New consumptive groundwater licences are not available and surface water is restricted to high flows only. New dewatering will need to demonstrate that it is non-consumptive to the local environment to obtain an abstraction licence. Please see Appendix 2 for further information on permitting.

Surface water abstraction will be subject to conditions which restrict access to water to periods of high flow. The use of surface water on site may therefore need to consider on site storage to meet demand outside of these periods.

SPZs

The scoping report identifies that the draft Order Limits include areas of SPZ1,2 and 3, which are sensitive areas surrounding groundwater abstraction points. The CEMP should recognise the presence of these and provide adequate mitigation measures to ensure they are kept free from contamination.

Water Resources Assessment

We recommend that a basic water resources assessment is undertaken at the EIA stage to establish water demands and options for sources of supply. This can help to identify potential obstacles early on and may affect the design or construction process.

Establishing what restrictions there are (more information can be found in the Abstraction licensing strategy) and evaluating the impacts to surface water and groundwater bodies may help to expedite the permitting process later on.

Chalk Streams

Our work on chalk streams is primarily focused on improving water resource pressures within chalk catchments to reach sustainable levels and also working with our catchment partners through projects. We note that chalk rivers have been scoped in for further assessment as they are considered a priority habitat for biodiversity (see Table 7-11) and that groundwater quantity has been scoped in during operation (see Table 19-9). Upper parts of chalk catchments are important for groundwater recharge, and consideration should be given to the impacts to groundwater recharge arising from increased interception from the development, in relation to chalk streams.

Further details of our work and that of other organisations in relation to chalk streams can be found within the CaBA Chalk Stream Restoration Strategy and Implementation Plan which is available here: Chalk Stream Strategy - CaBA. Consideration should be given to this strategy and the proposals should align with the latest collective understanding by National Chalk Stream Specialists and the actions the strategy hopes to achieve.

Flood Risk

We are pleased to see that Flood Risk has been scoped in for further assessment. We wish to provide the following information/advice to aid with an accurate assessment:

Development in Flood Zones

The draft Order Limits are largely within Flood Zone 1, which is land defined as a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) in any given year. Parts of the draft Order Limits are located within Flood Zone 2 and 3. Flood Zone 2 is land assessed as having between a 1 in 100 and 1 in 1,000 annual probability (1% - 0.1%) in any given year, and Flood Zone 3 is land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) in any given year.

Where development is located within Flood Zone 3a and 3b (functional floodplain), essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- Remain operational and safe for users in times of flood
- Result in no net loss of floodplain storage
- Not impede water flows and not increase flood risk elsewhere

The Sequential Test

In accordance with the NPPF and the Sequential Test (paragraph 161), development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The development should take a sequential approach where it can. If there are any opportunities for development to be located outside of Flood Zone 2 and 3 and into Flood Zone 1, this should be prioritized.

Floodplain Compensation

Any above ground construction proposed in an undefended area which increases in the footprint of buildings will require floodplain compensation. The Flood Risk Assessment (FRA) must consider floodplain compensation on a level for level, volume for volume basis.

With regards to floodplain compensation, we would usually consider the 1 in 100 year plus allowance for climate change flood height as the ‘design flood’. It should be noted that allowance for climate change may differ in river catchments.

The FRA must ensure that there is no increase in flood risk to third parties because of the development, for example by altering flow routes. Further guidance on this can be found here: Flood risk assessments: climate change allowances - GOV.UK.

Assets

A survey will need to be undertaken which assesses the pre-works and post-works condition of all assets that works may interact with and any defects must be identified and remediated.

Vibrations generated by construction work must be monitored and safe levels which do not adversely affect assets should be identified.

Flood Risk Modelling

We broadly agree with the content of the scoping report and are pleased to see that flood risk and drainage has been scoped in for the construction, operation, and decommissioning phases. Further advice on flood risk modelling is provided below.

Climate Change

Section 8.9.2.4 states how the 50% probability level will be used to assess the impacts of climate change. It is important to note that the 50th percentile reflects the central estimate. As the development would be classed as essential infrastructure, from a fluvial flood risk perspective climate change should be assessed for the higher central (design case) and upper estimates (sensitivity test) in line with guidance available online at: Flood risk assessments: climate change allowances - GOV.UK.

Section 2.5.3.1 states that the design life of the proposed development is 40 years. Considering the construction and decommissioning phases, we would recommend that the 2080's epoch is used to assess the effects of climate change to the proposed development during the operational phase.

Ordinary Watercourses

Section 19.5.3.37 describes how many of the smaller tributary ordinary watercourses present within the draft Order Limits are not represented in the fluvial flood mapping. It should be noted that this does not mean the ordinary watercourses do not pose a flood risk. Many of these watercourses have small catchment areas (less than 3km^2) and as such were not modelled as part of the strategic 2d modelling which was used to inform Flood Zones where no detailed hydraulic modelling exists. This Section of the scoping report also describes how flood risk from these watercourses is implicitly represented in the Risk of Flooding from Surface Water mapping. Please note that the Risk of Flooding from Surface Water mapping does not consider the effects of climate change. If using the Risk of Flooding from Surface Water Mapping as a proxy

for fluvial flood risk, particularly for any infrastructure located in these areas such as solar panels, BESS or transformers, it is important to provide supporting evidence that this is a suitable proxy for fluvial flood risk including the effects of climate change, or to undertake detailed hydraulic modelling.

Consent will need to be obtained from the Lead Local Flood Authority (LLFA) in order to carry out works to and within proximity to these Ordinary Watercourses.

Existing Hydraulic Modelling

The Environment Agency hold models for the Wendling Beck (Ch2m, 2017) and the River Wissey. When using these models for site specific flood risk assessment it is important to check that they are suitable in line with guidance on undertaking modelling for flood risk assessments available online at: Using modelling for flood risk assessments - GOV.UK.

It is necessary to consider:

- The application of climate change
- Whether the hydrology is still representative
- Whether there have been any changes to baseline conditions since the modelling was produced

Flood Modelling Data

The scoping report states that a data request has been made to us regarding the site. It is important to note that some of our model data is old and may present limitations. Furthermore, more recent data may not necessarily be suitable for the purposes it is intended to be used for. Should modelling work be required in connection with the proposed development, it will be necessary to check that the data used:

- Represents current risk
- Uses the latest available datasets
- Complies with current modelling standards
- Is it a scale suitable for the assessment being undertaken
- Captures the detail required for a site-specific assessment
- Makes use of current climate change allowances

This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) which is available online here: Using modelling for flood risk assessments - GOV.UK.

Third-Party Hydraulic Modelling

Section 19.10.1.4 states that any third-party information used is assumed to be accurate at the time of writing. We would like to reiterate that any detailed third-party hydraulic modelling used must be checked for its suitability and be representative in line with guidance on undertaking modelling for flood risk assessments available online at: Using modelling for flood risk assessments - GOV.UK.

Mitigation Measures

Section 19.7.2.2 describes how the solar panel modules will be raised above the predicted maximum flood depth for the 1 in 100 year plus climate change scenario. This is welcomed. For clarity, as this is essential infrastructure, climate change for the design scenario should be the higher central uplift. Typically, we request panels to be set 300 millimetres above the 1 in 100 year plus climate change level.

Magnitude of Impacts

With regards to impact magnitude as described within Table 3.71 within the Design Manual for Roads and Bridges (DMRB) which is presented in Table 19.12 of the scoping report, increases in peak flood levels of less than 10 millimetres are described as negligible. Please note that the classification presented within this Table does not align with the NPPF which details there should be no increases to flood risk to third parties because of new development. Any impacts to flood risk will need to be reviewed on a case-by-case basis as the spatial extent of any increase is also an important consideration not just the magnitude of any increase in peak water levels. Furthermore, considerations around modelling precision may also influence what is classed as an observable increase or impact versus what might be attributable to model precision limitations and instability.

There is a Section on the impacts on off-site flood risk within the guidance on undertaking modelling for flood risk assessments which should be consulted and provides some useful considerations. This is available online at: Using modelling for flood risk assessments - GOV.UK.

Regulated Industry

The Regulated Industry function of the Environment Agency is responsible for facilities that are within the scope of the Energy and Manufacturing Sectors of the Environmental Permitting Regulations (EPR). We are also responsible for aspects of the Control of Major Accident Hazards Regulations (CoMAH).

The EPR is primarily focused on controlling emissions to air and water but now takes an integrated approach to environmental protection by ensuring all aspects of pollution prevention is controlled to best available techniques. This includes both waste reduction and resource efficiency through a life cycle approach as well as

ensuring historical land contamination is recorded and remediated at the surrender of permits.

CoMAH is focused on ensuring major accidents to the environment are controlled to as low as reasonably practicable and that all measures necessary are implemented to prevent the initiation of major accident scenarios and mitigation measures to reduce harm are in place and communicated to primary and secondary emergency responders.

This proposal, ordinarily, would not require a permit as it is not an EPR listed activity, based on the information provided. Although we encourage the development of low carbon energy projects that should not be at the detriment of air, water and land quality.

We have provided 4 key areas to consider with respect to permitting requirements for this proposal.

1. The use of BESS are not currently regulated under the EPR, or CoMAH Regulations, but given the potential for pollution in abnormal, or emergency scenarios, there is a need to engage with the Environment Agency to ensure that basic pollution prevention and control advice is provided. The applicant should remain abreast of the development of potential regulatory requirements on BESS which are currently being discussed in the UK Parliament. Further information on this is available here: Battery energy storage systems (BESS) - House of Commons Library
2. Although there may be limited use of medium combustion plant (and specified generators) during the operational phase, it should be ensured that the construction phase uses an appropriate generator plant with the lowest releases of oxides of nitrogen in terms of emissions intensity. It should also be ensured that aggregation rules with respect to deployments are managed or apply for the appropriate medium combustion plant permits for deployment. Further information on medium combustion plants is available here: Medium combustion plant: when you need a permit - GOV.UK
3. There are a number of CoMAH establishments within 10km of the proposal and at least one within the 3km buffer zone. It should be ensured there are no comments from the CoMAH Competent Authority on whether this proposal provides an additional initiating major accident scenario or any threats to mitigation in the event of a major accident.
4. The proposal lies close to, or on, current and existing landfills. Many of these still have active EPR permits and there is risk to groundwater and surface water if piling or landscaping was to occur without management control and risk mitigation. There is a need to actively engage with the Environment Agency regarding these risks.

Appendix 2

In addition to the above, the following guidance should be followed to inform which permits may be necessary for this project. Due to the lengthy timescales currently involved in the determination process, we would encourage engagement with our permitting pre-application advice service at the earliest possible opportunity.

Water Discharge Activity Permits

Unless an exemption applies, Water Discharge Activity Permits will be required for any discharges of sewage effluent, trade effluent, waste matter or any other poisonous, noxious or polluting matter into controlled waters. This includes the discharge of surface water with the potential to be contaminated with sediment from areas of exposed soils. We would encourage engagement with our permitting pre-application advice service as soon as practicable to discuss this matter further.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: Discharges to surface water and groundwater: environmental permits - GOV.UK

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Dewatering

Shallow groundwater may be encountered in some areas of the site and either temporary or permanent dewatering may be required. If dewatering is required, an environmental permit may be required if it does not meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK

If the applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) - GOV.UK

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Please refer to the 'Water Resources' section of Appendix 1 for further information on dewatering in this area.

Flood Risk Activity Permits (FRAPs)

If any of the works are likely to require a FRAP under the Environmental Permitting Regulations, we recommend the applicant consider early on whether they might consider the disapplication of the EPR and matters pertaining to FRAPs be considered as Protective Provisions under the DCO.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once DCO permission has been granted, and we advise them to consult with us at the earliest opportunity.

There are multiple types of a FRAP which can be found here: Flood risk activities: environmental permits - GOV.UK

A Bespoke permit has a determination period of 8 weeks however we would recommend the applicant factors in 12 weeks as there may be requirements for additional information and process delays which might affect the process.

Fish Surveys

Before any fish surveys are conducted authorisation in writing from the Environment Agency under Section 27A of the Salmon and Freshwater Fisheries Act (1975) will be required. Further information on this can be found here: Permission to move live fish to or from a fishery - GOV.UK

Protected Provisions

Any requests to disapply any permits or consents should be sent to us in writing as soon as possible to allow us sufficient time to consider them (minimum 6 months). Depending on the outcome this will have implications on the content of the DCO.

From: [redacted]
To: High Grove Solar
Subject: High Grove Solar - EN0110010 - EIA Scoping Consultation
Date: 02 October 2024 17:39:05
Attachments: [redacted]

> You don't often get email from [redacted]

Thank you for consulting the Forestry Commission on this proposal.

As the Governments Forestry Experts, we endeavour to provide relevant information to enable the project to reduce any impact on irreplaceable habitat such as ancient semi natural woodland as well as other woodland.

We note there are several areas of Ancient Woodland directly adjacent to and within the proposed order limits. Necton Wood Ancient Semi Natural Woodland being within the site, with Sporle Wood, Great Wood, North Grove and High Grove all adjacent to it.

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

"*Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases"*

Section 5.4.53 goes on to state:

"*The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists"*
We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic.
You should, however, be aware that updates to the Ancient Woodland Inventory are ongoing as part of a national review where new mapping for designations is being rolled out by county area, as and when they become available. The updated AWI mapping will improve on the original AWI in that it will provide new designations including those under 2ha. We understand the AWI review of this authority area has not been released yet, therefore there may be more Ancient Woodland in the vicinity that the AWI does not currently show.

Whilst we acknowledge that plans state that the Ancient Woodlands will be retained as part of the scheme, we also advise that in considering the impacts of the development, there is a need to consider direct and indirect impacts resulting from both construction and operational phases.

Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include increasing the risk of damage to property by falling branches that require tree management that could cause habitat deterioration and changing the landscape character of the area.

There are also numerous fragmented areas of mixed deciduous woodland within the site. Mixed Deciduous Woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"*Existing trees and woodlands should be retained wherever possible…….The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"*

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone.

A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change. Woodland also provides habitat for a range of Section 41 Priority Species including all bats.

It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also

be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees possibly between the existing woodland blocks on site, to ensure maximum gains to increase habitat connectivity and benefit biodiversity across the whole site, not solely in specific areas or just to be used as screening.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered.
- Woodlands need to be climate, pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)
- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.
Best wishes

Sandra

[redacted]

Local Partnership Advisor
East & East Midlands

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HSE

Health and Safety Executive

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

By email only - highgrovesolar@planninginspectorate.gov.uk

Dear Ms Glassop

Date: 18/09/2024

PROPOSED HIGH GROVE SOLAR (the project)
PROPOSAL BY RWE RENEWABLES UK SOLAR AND STORAGE LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 10 September 2024 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of **no** major accident hazard site ['MAHS'] and **three** major accident hazard pipelines ['MAHP']. This is based on the redline shown in Figure 1.1 of the EIA Scoping Report September 2024 (hereafter referred to as 'Scoping Report') [downloaded from: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110010-000003-High%20Grove%20Solar%20Scoping%20Report%20Figures%20-%20Part%201.pdf] and the GIS files provided via email on 16/09/2024 ("High Grove Solar DCO draft Order Limits for HSE.zip").

HSE's records indicate that major accident hazard pipelines which are operated by Cadent Gas Ltd, are:

- Bushy Common / Saham Grove; HSE ref. number 7413, Transco ref.: 1672
- Saham Grove / Swaffham; HSE ref. number 7414, Transco ref.: 1673
- Watton Tee / Watton, HSE ref. number 7415, Transco ref.: 1674

The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the Scoping Report it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Hazardous Substance Consent

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Based on the scoping report it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes consideration of risk assessments under the heading "Risk assessments".

Chapter 15 of the Scoping Report considers 'Major accidents and disasters' where one COMAH site was identified 1.2 miles away from the DCO however, major accident hazard pipelines were not considered. Thus, there was no consideration of risk assessments arising from the development's vulnerability to major accidents from the above identified pipelines. We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: ***"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.".***

Note there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Explosives sites

CEMHD 7's response covers all 5 proposed developments (Western, Central, Northern, Eastern and Southern) - no comment to make as there are no HSE licensed explosive sites in the vicinity of the proposed developments

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

[redacted]

Cathy Williams
CEMHD4 NSIP Consultation Team

From: [redacted]
To: High Grove Solar
Subject: Consultation Comments
Date: 17 September 2024 11:08:56

> You don't often get email from [redacted]

Dear Team

The following are the comments from Little Dunham Parish Council in response to the consultation:

Little Dunham Parish Council has concerns about the size of the proposed development in what is already a landscape with much green energy infrastructure. We do not understand why the location of the new substation has not yet been identified, and in particular we are anxious to see details of the suggested landscape mitigation.

Regards
Sheryl

Sheryl Irving
Parish Clerk
Brisley Parish Council
[redacted]
www.brisleypc.info

From: [redacted]
To: High Grove Solar
Subject: National Highways Scoping Opinion Consultation Response to High Grove Solar
Date: 08 October 2024 14:24:22

> You don't often get email from [redacted]

National Highways Scoping Opinion Consultation Response

National Highways welcomes the opportunity to respond to the consultation for a Scoping Opinion for the application for Development Consent for the High Grove Solar project.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) under the provisions of the Infrastructure Act 2015 and is the highway authority for the Strategic Road Network (SRN). The Department for Transport (DfT) Circular 01/2022 (Strategic road network and the delivery of sustainable development) sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. In addition, National Highways are responsible for ensuring the SRN serves its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

National Highways have reviewed the Scoping Reports and would require the following information to be included within the Environmental Statement:

- a vision as per the Circular 01/2022;
- outline relevant National and Local Policies;
- summarise existing baseline conditions;
- provide details of the Proposed Project;
- sets out the distribution of the construction traffic;
- details the construction trip generation;
- identify any necessary mitigation;
- assesses the impact of local committed developments;
- carryout a cumulative assessment for the other NSIPs that are coming through around the project area; and
- summarises the findings and provide an overall conclusion.

National Highways suggest the following documents are referenced within the policy review for the project:

- National Policy Statements EN-1 and EN-5;
- National Planning Policy Framework (NPPF) (2023);
- Department for Transport Planning Policy Paper (DfT Circular 01/2022); and
- National Highways ‘The Strategic Road Network: Planning for the Future Guide’ (2015);

In addition to the above, National Highways have the following comments to make.

In accordance with paragraph 70 of the 01/2022 Circular, we recommend that the Development Consent Order suite of documents includes a Glint and Glare Assessment, or similar considering the perspective of road users of the A47 to ensure road safety. For clarity, Paragraph 70 of the circular reads as follows: '*Some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, promoters must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which satisfies the company that safety on the SRN is not compromised.'*

National Highways consider AIL's would need to be scoped in and considered at EIA stage. National Highways would advise that the Applicant directly discusses any matters pertaining to AIL movements with the National Highways Abnormal Indivisible Loads team (AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk). Increased congestion and increased journey times/distance due to road closures or diversions for abnormal load access on the receptor 'Road user' would need to be scoped in due to the cumulative impact of other developments on the SRN.

National Highways advises consideration of any committed development and their cumulative impact within the project area are outlined within the Environmental Statement and Transport Assessment.

National Highways agree with the inclusion of SRN junctions within the Study Area. Further to this, we request the Applicant to provides information on the trip distribution, providing flow diagrams which include the junctions with the SRN in the vicinity of the proposed development. If the proposed development proposes to generate an increase of 30 two-way movements or more on any junctions on the Strategic Road Network within a peak period (AM or PM), we expect a capacity assessment to be undertaken to assess the impact of the proposed trips on the affected junctions and provide mitigations, if required. Where a junction capacity assessment could potentially be required, and we ask that National Highways are consulted early during the TA scoping process to ensure impacts to the SRN (and LRN) are appropriately assessed. This will enable us to determine the severity of traffic from this development on the operation and safety of the SRN.

National Highways trusts its response provides clarification of its concerns and identify other matters which National Highways considers need to be addressed at this stage of the project. However, if you have any questions or comments regarding the contents of the letter then please do not hesitate to contact me on the details provided. National Highways looks forward to continuing positive engagement with RWE as the project progresses.

Kind regards
Alice

Alice Lawman MRTPI

Spatial Planner
Operations (East) | National Highways
Woodlands | Manton Lane | Bedford | MK41 7LW
[redacted]
Web: www.nationalhighways.co.uk

For any planning related matters please email PlanningEE@nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 |National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | https://nationalhighways.co.uk | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

From: [redacted]
To: High Grove Solar
Cc: HRE Enquiries
Subject: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation
Date: 08 October 2024 17:14:45

> You don't often get email from [redacted]

Dear Sir/Madam,
With respect to the above consultation three bridges forming part of the Historical Railways Estate, managed by National Highways on behalf of Secretary of State for Transport are affected by the scheme boundary as follows:-

RJS/2403 OS Ref TF9094305626 Within the Draft Order Limits.

MTD/2377 OS Ref TF9128813319 Dereham Lane – Within the 1km Draft Order Limits 1km Buffer zone

MTD/2379 OS Ref TF9166413259 Beeston Road – Within the 1km Draft Order Limits 1km Buffer zone

Best regards

Alistair

Alistair Dore Civil Engineer
Historical Railways Estate (on behalf of Department for Transport)
National Highways | 37 Tanner Row | York | YO1 6WP
General Office: +44 (0) 1904 621924
[redacted]
Web: http://www.nationalhighways.co.uk
HRE Web: https://nationalhighways.co.uk/our-work/historical-railways-estate/
General email enquiries: **hreenquiries@nationalhighways.co.uk**

Behind the scenes under a former railway bridge [redacted]

Our work with National Trust to transform Manchester's Castlefield viaduct: [redacted]

Read the full story on our website

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B32 1AF | https://nationalhighways.co.uk | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

From: NATS Safeguarding
To: High Grove Solar
Subject: RE: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation [SG38090]
Date: 11 September 2024 08:53:37
Attachments: ~WRD0000.jpg
image007.png
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You don't often get email from natssafeguarding@nats.co.uk. Learn why this is important

Our Ref: SG38090

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

Date: 08 October 2024
Our ref: 487376
Your ref: EN0110010

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

highgrovesolar@planninginspectorate.gov.uk

BY EMAIL ONLY

Dear Ms Glassop

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: High Grove Solar: Solar Farm with Battery Energy Storage Systems (BESS)
Location: Land between Swaffham & Dereham, Norfolk

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 10 September 2024, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For this development, in particular, Natural England highlights that the following issues require consideration within the EIA:

- Impacts of the proposed development on: Breckland Special Protection Area (SPA), River Wensum Special Area of Conservation (SAC), Norfolk Valley Fens SAC, The Broads SAC, Broadland Ramsar, Breckland Forest Site of Special Scientific Interest (SSSI), River Wensum SSSI, and Potter & Scarning Fens, East Dereham SSSI (see sections 5 and 6 of Annex A for more detailed advice).
- Impacts of air pollution from construction traffic on designated sites (see section 15 of Annex A).
- Impacts of the development on best and most versatile soil (see section 14 of Annex A).

Natural England have been engaged by the applicant in Pre-Application discussions via our Discretionary Advice Service. To date, advice relating to soils and ancient woodland has been provided. A meeting is planned to discuss impacts to birds, including, nightjar,

woodlark and stone curlew, which are features of Breckland SPA, which is adjacent to the draft order limits. Natural England will continue to engage with the applicant throughout the pre-application stages.

For any further advice on this consultation please contact the case officer [redacted]l@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely

Emma Hurrell
Higher Officer, Norfolk and Suffolk Sustainable Development Team

Annex A – Natural England's Advice on Environmental Impact Assessment (EIA) Scoping

1. General principles

1.1. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2. Based on Natural England's engagement with the applicant to date, and the EIA Scoping Report provided, it appears that these principles are likely to be met.

2. Cumulative and in-combination effects

2.1. The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

2.2. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which

an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
Norfolk Boreas	Approved but uncompleted project
Norfolk Vanguard	Approved but uncompleted project

3. Environmental data

3.1. Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

3.2. Detailed information on the natural environment is available at www.magic.gov.uk.. This includes Marine Conservation Zone GIS shapefiles.

3.3. Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

3.4. Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

4.1. The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2. Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. Designated nature conservation sites

International and European sites

5.1. The development site is within or may impact on the following **European/internationally designated nature conservation site(s):** Breckland SPA, River Wensum SAC, The Broads SAC, Broadland Ramsar, and Norfolk Valley Fens SAC.

5.2. The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

5.3. Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

5.4. A meeting is planned with the applicant and the RSPB to discuss impacts and issues related to birds. This will allow for a discussion on the assessment of impacts from the proposed development on the designated features (nightjar, woodlark and stone curlew) of Breckland SPA.

5.5. Natural England always advise that our SSSI Impact Risk Zones are used to inform the scoping of potential impacts to SSSIs from development, as well as professional judgement. In addition, we would advise that application of standard threshold distances for assessment may not be suitable, especially when sites support mobile/migratory bird species and/or may be impacted via a pathway originating further than the threshold used.

5.6. For the purposes of the Scoping exercise, we have provided below a table of the relevant internationally designated sites, stating whether we consider they should be scoped in or out of further assessment in the ES (Table 2). There is a similar table in the following section, 'Nationally Designated Sites', (Table 3).

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Breckland SPA	Nightjar (*Caprimulgus europaeus*) and Woodlark (*Lullula arborea*), Stone curlew (*Burhinus oedicnemus)*	The proposed development lies adjacent to Breckland Forest SSSI, which is a component part of Breckland SPA designated for nightjar and woodlark. Impacts from disturbance at all stages of the project should be assessed. The structure and function of the habitats that support these features may be sensitive to changes in air quality. Natural England advise air quality impacts from construction traffic are further assessed.
River Wensum SAC	All Habitats & Species noted on the SAC citation.	As identified in paragraph 19.5.3.5 of the EIA Scoping Report, several watercourses flow within the draft order limits. Further information is required to determine if they are hydrologically linked to this SAC. Consideration should be given to any possible effects of the cable works upon watercourses linked to the SAC (e.g. methodology used for watercourse

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
		crossings). Natural England note, and welcome, that the EIA Scoping Report has identified the proposed development's potential to increase the risk of contaminant leaching to ground and surface water, which have been scoped into the assessment (Table 22-1).
The Broads SAC	All Habitats & Species noted on the SAC citation.	Whilst The Broads SAC is over 30km from the proposed development, there are several watercourses that flow within the draft order limits. Further assessment is required to determine if they are hydrologically linked to this SAC. Consideration should be given to any possible effects of the cable works upon watercourses linked to the SAC (e.g. methodology used for watercourse crossings). Natural England note that the EIA Scoping Report has identified the proposed development's potential to increase the risk of contaminant leaching to ground and surface water, which have been scoped into the assessment (Table 22-1).
Broadland Ramsar	All Habitats & Species noted on the SAC citation.	Whilst Broadland Ramsar is over 30km from the proposed development, there are several watercourses that flow within the draft order limits. Further assessment is required to determine if they are hydrologically linked to this designated site. Consideration should be given to any possible effects of the cable works upon watercourses linked to the site (e.g. methodology used for watercourse crossings). Natural England note that the EIA Scoping Report has identified the proposed development's potential to increase the risk of contaminant leaching to ground and surface water, which have been scoped into the assessment (Table 22-1).
Norfolk Valley Fens SAC	All Habitats & Species noted on the SAC citation.	Potter & Scarning Fens, East Dereham SSSI, is a component part of Norfolk Valley Fens SAC and is less than 2km from the draft order limits and adjacent to the A47. These features may be sensitive to changes in air quality. Natural England advise air quality impacts from construction traffic are further assessed.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
		In addition, impacts on water quality will also need to be assess as the proposed development may be hydrologically connected to the SAC.

6. Nationally designated sites

Sites of Special Scientific Interest

6.1. The EIA Scoping Report has identified several SSSIs within 10km of the draft order limits. Natural England advise that the development site is within or may impact on the following **Site of Special Scientific Interest:** Breckland Forest SSSI, River Wensum SSSI and Potter & Scarning Fens, East Dereham SSSI.

6.2. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within any nearby SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6.3. Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Breckland Forest SSSI	Breeding birds - Nightjar (Caprimulgus europaeus) and Woodlark (Lullula arborea) also features of the Breckland SPA designation this site also holds. Invertebrate assemblages and vascular plant assemblages will also need to be considered.	See table 2 for impacts to the breeding bird features. The vascular plant assemblages and the structure and function of the habitats that support the invertebrate assemblages may be sensitive to changes in air quality. Natural England advise air quality impacts from construction traffic are further assessed.
River Wensum SSSI	All habitats and species for which the site has been notified.	See table 2.
Potter & Scarning Fens, East Dereham SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and an assessment of a hydrological connection should be scoped into the ES.

6.4. Additional advice on impacts to air quality and water quality have been provided in sections 15 and 16 of this annex, respectively. This advice may cause additional SSSIs to be scoped into the EIA.

7. Regionally and Locally Important Sites

7.1. The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group and protected under the NPPF (paragraph 180). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. We advise the Applicant to contact the relevant local body for further information.

8. Protected species

8.1. The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

8.2. The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

8.3. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences.

8.4. Where licence need is identified, applicants should make use of Natural England's Pre Submission Screening Service for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the Development Consent Order (DCO) be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

9. Priority Habitats and Species

9.1. Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be

mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

9.2. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

9.3. An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

9.4. The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10. Ancient Woodland, ancient and veteran trees

10.1. Ancient Woodland is mapped in the proximity of the proposed development. This includes High Grove (National Grid Ref: TF92150710), Great Wood (National Grid Ref: TF91401023), Necton Wood (National Grid Ref: TF90221080) and Sporle Wood (National Grid Ref: TF86081176), which all lie adjacent to the draft order limits. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

10.2. Natural England have provided some initial advice to the Applicant, referring them to Natural England and the Forestry Commission's standing advice on ancient woodland, ancient and veteran trees. We have advised that 15 metres from the boundary of ancient woodland is considered a **minimum** distance. The standing advice provides further detail on when the buffer zones should be increased and what the buffer zone should/should not include.

10.3. Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. This is reflected in NPS EN-1 paragraphs 5.4.14 and 5.4.15.

10.4. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out

information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees.

11. Biodiversity net gain

11.1. The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.

11.2. The EIA Scoping Report does reference the inclusion of biodiversity net gain. However, there is no commitment to an increase value (i.e. 10%). Natural England would encourage the Applicant to commit to at least 10% Biodiversity Net Gain across habitat, river and hedgerow units, illustrated via the use of the statutory biodiversity metric.

11.3. In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site. Natural England also recommend consultation with the Norfolk Wildlife Trust, and any other local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed by the project.

11.4. In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. The ES should make clear the project's contribution to ecological connectivity in the area, the Nature Recovery Network and climate change resilience.

12. Landscape

Nationally designated landscapes

12.1. The development site is not within, or within proximity to, any nationally designated landscapes.

Landscape and visual impacts

12.2. The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

12.3. Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013.

LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

12.4. A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by the LI and IEMA. For National Parks and National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

12.5. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

12.6. To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

12.7. The National Infrastructure Commission has also produced Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

13. Connecting people with nature

13.1. Natural England notes that the EIA Scoping Report has scoped in potential effects on the Public Rights of Way (PRoW), which Natural England welcomes. As detailed in paragraph 17.5.3.7 of the EIA Scoping Report, there are several PRoW that interact with the draft order limits, including three national trails and cycle routes.

13.2. The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

13.3. Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

13.4. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

14. Soils and agricultural land quality

14.1. Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land. This is a matter the Applicant has already engaged with Natural England on for advice. Further detail is provided below.

14.2. Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

Survey Scope

14.3. The Applicant has informed Natural England that reconnaissance-level Agricultural Land Classification (ALC) and soil surveys are underway (notified 26 September 2024). Whilst these surveys are yet to be finalised, Natural England have been provided with some details of the survey methodology and initial findings and we have provided some initial comments.

14.4. To date, a sampling density of 1 auger per 3 hectares has been taken. Natural England have advised that a sampling density of at least 1 auger per 2 hectares is preferrable with an increase to 1 auger per 1 hectare in areas where soils would be permanently impacted or lost, such as around permanent infrastructure.

14.5. Natural England have been informed that no survey of the cable route has been undertaken. Natural England have been consulted on this matter, which we welcome. Natural England will provide our advice on this matter in due course.

14.6. Natural England have been shown soil maps by the Applicant, which show Isleham 2 association, which contain areas of deep peat. We have advised that if peat is found in the survey, that these areas are avoided.

Additional Scoping Advice

14.7. The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

14.8. The ALC survey should also be used to inform the final design of the project and inform micro-siting of infrastructure such as the BESS to avoid BMV land. The

ES should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan.

14.9. Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, access tracks, battery energy storage system (BESS)/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost, such as the 400kV substation.

14.10. The EIA Scoping Report suggests that the lifetime of the development will be 40 years. During the life of the proposed development, it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited, the areas subject to a change in land use or land management have the potential to lead to the permanent reduction in the land's potential agricultural production.

14.11. Natural England advise that a commitment should be made through the DCO to reinstate all Best and Most Versatile Land back to its former ALC grade, following decommissioning.

15. Air quality

15.1. The EIA Scoping Report has scoped out effects on air quality from further assessment. However, Natural England **does not concur** with this conclusion. As stated in paragraph 6.4.1.2 of the EIA Scoping Report, the exact number and distribution of construction traffic on the network has not yet been determined. Natural England, therefore, advises that impacts of increased air pollution from construction traffic on nationally and internationally designated sites cannot be scoped out.

15.2. Our advice is that any site within 200m of a road experiencing an increase of 1000AADT (or 200AADT for HDVs) is scoped in for consideration within the ES. For further advice on assessing the impacts of traffic on designated sites, we refer you to Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations – NEA001.

15.3. Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

15.4. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs which may be being developed or implemented to mitigate the impacts of air quality. Natural England advise that the proposed development does fall within the Breckland SNAP area. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

15.5. Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

16. Water quality

16.1. Section 19 of the EIA Scoping Report assesses water resources and flood risk. Several watercourses have been identified as flowing within the draft order limits. The ES should assess the potential of these watercourses being hydrologically linked to the River Wensum SAC and SSSI, Broad SAC and Broadland Ramsar. Natural England advise that construction methods used in watercourse crossings are assessed for their impact on water quality.

16.2. NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

16.3. The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

17. Climate change

17.1. The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people.

17.2. Part 2 of EN-1 covers the government's energy and climate change strategy, including policies for mitigating climate change. Section 4.10 sets out generic considerations that applicants and the Secretary of State should take into account to help ensure that energy infrastructure is safe and resilient to climate change. This section further advises that the resilience of the project to climate change should be assessed in the ES accompanying an application.

17.3. EN-1 sets out strong support for the use of Nature-based Solutions and nature inclusive design, for example:

- In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of Nature-based Solutions alongside other conventional techniques (4.10.5).
- In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, Nature-based Solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere (4.10.7).
- Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning (5.3.6).
- Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats (5.3.7).
- The design process should embed opportunities for nature inclusive design (5.4.21).
- Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon (5.4.33).
- In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:
    - reductions in GHG emissions
    - reduced flood risk
    - improvements to air or water quality
    - climate adaptation
    - landscape enhancement
    - increased access to natural greenspace, or
    - the enhancement, expansion or provision of trees and woodlands.
- The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of Nature-based Solutions and Green Infrastructure (4.6.13).

17.4. Key Natural England resources that you may find useful include:

- Carbon storage and sequestration by habitat: a review of the evidence (second edition)
- Climate Change Adaptation Manual: Evidence to support nature conservation in a changing climate -This contains the Landscape Scale Climate Change Assessment Methodology
- Nature Networks Evidence Handbook

Norfolk County Council's Comments to the Planning Inspectorate on the:

High Grove Solar – Scoping Opinion

October 2024

1. Introduction

1.1 The County Council welcomes the opportunity to provide comments on the above Environmental Impact Assessment (EIA) Scoping Opinion/Report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on the Development Consent Order (DCO) application during the statutory consultation periods; and at the Public Examination stage.

1.2 The County Council would expect to see the following items addressed in the EIA:

- Impact to landscape needs to be minimised
- Addressing Ecology and Biodiversity Net Gain
- Quantifying agricultural land loss and safeguarding high quality land
- Habitat Loss and mediation plan
- Consideration regarding the disposal of the panels once decommissioned
- Supply chains as to where the panels will be produced

2. Socio-Economic

2.1 The County Council would expect RWE to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. Whether through the formal DCO process or post DCO, there would be an expectation that RWE will provide and take forward a Community Benefit Fund. Reference to a community benefit fund specifically designed to mitigate and compensate for any local impacts to residents and businesses should be scoped into the ES as part of any wider consideration of impacts on business.

2.2 The Environmental Impact Assessment (EIA) / Preliminary Environmental Information Report (PEIR) will need to assess the wider economic benefits arising from the above development both in terms of the scheme coming forward on its own and in combination with other major energy projects in the area, particularly the Droves Solar project being taken forward by Island Green Power given the projects close proximity to each other. The EIA will need to indicate:

- Likely number of jobs created on this project

- Jobs likely to be generated locally (i.e. within Norfolk)

- An indication of the type of jobs created e.g. construction; engineering; and opportunities for training should be scoped into the ES. The County Council would expect the applicant to prepare a skills and employment plan/strategy as part of the DCO process and reference to this should be scoped into the ES;

- Likely duration of any construction work

- Potential to use local supply chains

2.3 The ES will need to consider the potential impacts on existing businesses; and the compensation needed.

3. Energy Statement

3.1 The County Council would expect RWE to produce an Energy Statement post consent, secured through a Planning Requirement / Condition attached to the DCO, in the same way the County Council expects an Employment and Skills Strategy and a Supply Chain Strategy.

3.2 Energy Statements will need to address / cover-off the following issues:

- Demonstrate how the proposal will provide a secure and resilience supply of electricity within the County – avoiding any potential power outages/shortages/interruption of supply;
- Demonstrate how the project aligns with the County Council's approved Climate Strategy; and emerging Energy Plan;
- Opportunities for delivering power locally using the local 132kV network (UKPN). There will need to be evidence that the developer has engaged, or will be engaging, with the local Distribution Network Operator (DNO) to explore distributing electricity generated locally;
- Exploring opportunities to deliver electricity to those areas of the County where there are demonstrable deficits in energy which is known to be holding back development; or causing local problems;
- Consider wider opportunities for decarbonising the grid within the County to deliver:
  (a) planned housing and employment growth; and/or
  (b) Local Projects - including self-build in rural areas;
- Consideration of delivering wider sustainable projects including:
  (a) Electric Vehicle (EV) charging hubs
  (b) Commercial EV charging hubs including for buses;
  (c) Providing / unlocking additional power to local businesses and proposed growth in commercial sector – such as Lotus at Hethel.

(d) Localised off-grid energy solutions for housing and commercial Projects

3.3 Should you have any queries with the above comments please contact: Stephen Faulkner[redacted]@norfolk.gov.uk

4. Highways

4.1 The Environmental Impact Assessment (EIA) scoping report states that the precise alignment of the project, location of construction compounds and the haul roads are not yet known and are still under development. Accordingly, there is insufficient detail at present to enable the Local Highway Authority to provide a full assessment of the project and the highway comments below are therefore of a general nature.

4.2 Works within Norfolk are identified as five Panel areas made up of solar photovoltaic (PV) panels, on-site energy storage (BESS), underground cables, associated infrastructure including substations and other supporting infrastructure, as well as mitigation measures such as biodiversity net gain and landscape design.

4.3 The Highway Authority would ask that specific regard is made to the Hornsea 3, Vanguard and Sheringham Shoal NSIPs that will have infrastructure and accumulated traffic in and around the Necton substations.

4.4 As part of our initial discussion with the applicant the Highway Authority have asked that the formal DCO application be accompanied by a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP). It is noted that the volume of construction traffic is not yet known but that a commitment is provided within the EIA scoping report to provide a TA and CTMP. The TA needs to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal loads.

4.5 It is noted that the traffic and transport effects during operation (including maintenance) are out of scope and the Highway Authority is happy to agree on that point.

4.6 As a general point, the overall thrust of the EIA scope relates to examining increases in traffic volumes (in particular represented as a percentage figure) and the Highway Authority wish to point out that the public highways around the proposed locations in Norfolk are predominantly narrow minor rural lanes. Accordingly, even a small volume of traffic on these routes can have a significant impact if vehicles are unable to physically pass each other and this point needs to be considered within the CTMP.

4.7 The Environmental Statement will need to consider emergency access (to blue light services) associated with any temporary road closures; and/or temporary roadworks.

4.8 For further Information on highway related matters please contact John Curtis (Engineer Major and Estate Development - NSIP) Email: [redacted]@norfolk.gov.uk

5. Strategic Transport

5.1 The Strategic Transport team want to ensure that the project does not impact on the strategic function of the A47, both during construction and once the project is in operation.

5.2 Should you have any queries with the above comments please contact: Richard Doleman [redacted]@norfolk.gov.uk

6. Public Rights of Way

6.1 At this stage the County Council would recommend that the applicant takes the following into account in the ES:

- Impacts during construction- If any Public Rights of Way need to be crossed; or are impacted by any construction of supporting infrastructure; or will require a temporary closure, then this would require consultation in advance to the Highway Authority;

- Impacts during operation- If any Public Right of Way will be impacted during the operation and servicing of the project then details should be provided in advance and any proposed mitigation measures be put in place.

6.2 The DCO will likely need a Planning Requirement to address the above matters along the lines:

Public Rights of Way Strategy.—(1) No phase of the works that would affect a public right of way specified in Schedule 4 (public rights of way to be temporarily stopped up) is to be undertaken until a public right of way strategy in respect of that phase and in accordance with the outline public rights of way strategy, including the specification for making up of an alternative right of way (where appropriate) has been submitted to and approved by the relevant highway authority in consultation with the relevant planning authority.

(2) Any alternative public rights of way must be implemented in accordance with the approved public rights of way strategy.

6.3 Should you have any queries with the above comments please contact: Natural Environment Team NETI@norfolk.gov.uk

7. Historic Environment

7.1 The Historic Environment team note that impact to below-ground archaeological remains have been scoped into the EIA and support that position.

7.2 The Historic Environment team have the following detailed comments to make with regard to Section 9.5.2.3:

7.3 Any archaeological desk-based assessment produced in relation to this scheme needs to contain and take into account data from a project specific Aerial Investigation Mapping (AIM) survey carried out by a recognised specialist. The AIM survey will need to examine all existing physical and digital aerial images including Norfolk Air Photo Library collections (which can be accessed via our HER team), the Historic England Archive collection in Swindon and Environment Agency LiDAR data. Digital sources include Google Earth, Bing and Apple Maps (See section 5.1.2 of the Standards for Development-Led Archaeology in Norfolk). The Cambridge University Collection of Aerial Photography (CUCAP) is still closed for physical searches, some images are available online.

7.4 The Historic Environment team do not accept that the results of geophysical survey as the only factor determining the location and extent of pre-consent trial trenching. Apparently blank areas as well as areas considered 'high risk' based on the results of geophysical survey also need to be tested. The Historic Environment team are more than willing to engage directly with the applicant's archaeological advisors on this issue.

7.5 Should you have any queries with the above comments please contact John Percival (Historic Environment Senior Officer)[redacted]@norfolk.gov.uk

8. Public Health

8.1 Public Health Norfolk expects that Institute of Environmental Management and Assessment (IEMA) guidance is followed when considering the project's impact on human health, notably IEMA's Effective Scoping of Human Health in Environmental Impact Assessment and Determining Significance for Human Health in Environmental Impact Assessment (both published in November 2022).

8.2 Given the scale of the project, Public Health Norfolk strongly recommends that the ES includes a dedicated chapter on human health. Whilst the scoping report concludes that such a chapter is unnecessary due to potential impacts being assessed elsewhere, a chapter summarising the project's health related impacts, regardless of their significance, should be included to ensure clarity for stakeholders. The chapter should address the direct health impacts (e.g., air quality and noise) and should consider the wider determinants of health,

including potential effects on mental wellbeing. It is appropriate that potential impacts are assessed in their own chapters, but a health chapter should be included to summarise these impacts whilst also considering potential synergistic effects, which may exacerbate health impacts when considered together. If significant health impacts are identified, appropriate mitigation strategies should be detailed.

8.3 One omission from the scoping report is mention of the project's impact on mental health. While certain physical impacts may be deemed insignificant, perceived impacts – particularly in relation to visual amenity impacts and concerns surrounding electromagnetic fields (EMFs) – can contribute to stress and anxiety in local communities. As outlined in IEMA's *Effective Scoping of Human Health in Environmental Impact Assessment*, perceived impacts can have real effects on mental health and should be considered appropriately. As such Public Health Norfolk requests that the mental health impacts of the project are scoped into the assessment and an appropriate mental health assessment is undertaken. Norfolk Public Health would welcome further conversations about the project's impact on mental health and wellbeing in the local area.

8.4 In regard to EMFs, the UK Health Security Agency is the lead agency with responsibility for health threats from radiation in the UK and is a statutory consultee for Nationally Significant Infrastructure Projects. It should be consulted regarding the appropriateness of scoping out of the impacts of EMF from the Environmental Statement as stated in 10.8.

8.5 Public Health Norfolk welcomes the commitment to undertaking a construction and decommissioning phase dust assessment in accordance with Institute of Air Quality Management guidance and expects that the potential health impacts form an integral part of this, particularly in relation to vulnerable populations. It would be expected that the impacts on air quality and human health, regardless of their significance, are summarised in a specific human health chapter.

8.6 Public Health Norfolk welcomes the commitment to "Enhance existing [Public Rights of Way] and permissive paths" (7.7.3.5) and encourages the inclusion of additional measures to ensure accessibility for all users.

8.7 Should you have any queries with the above comments please contact Jane Locke – Prevention Policy Manager – Places (Public Health)
[redacted]@norfolk.gov.uk

9. Minerals and Waste

9.1 There is proposed to be five areas of panels covering a total of around 600 hectares of land within this zone. It is proposed that the solar farm will be subject to an application for a Development Consent Order as an NSIP and the Scoping report is based on the draft Order Limits which include not only the panel areas but also areas within which enabling infrastructure such as the cabling corridor may be located.

9.2 A map has been included in this response which shows the safeguarded mineral resources and safeguarded existing mineral and waste facilities in proximity to the area covered by the draft Order Limits.

9.3 **Mineral resource safeguarding**

Despite the large area covered by the draft order limits, the area underlain by safeguarded mineral resources is relatively small and limited to the following areas:

- an area within the Central Panel Area (27ha),
- a small area (0.7ha) of the potential cabling corridor north of Sporle,
- another area (15ha) of the potential cabling corridor close to Necton, and;
- a small area (3ha) of the Eastern Panel Area and the potential cabling corridor, near Daffy Green.

The proposed development is designed to have a limited lifetime of 40 years, after which decommissioning would take place to remove the panels and associated infrastructure. Given that it is proposed that the mounting structure of the panels would utilise steel poles driven into the ground as 'no dig' form of foundation then these would not permanently sterilise the limited amount of mineral resource within the panel areas. It is proposed that the inverters, transformers and battery storage would be placed on a compacted pad foundation, which would be removed as part of the decommissioning process. Therefore, these would not result in any permanent sterilisation of the limited amount of mineral resource within these areas.

Given the above information, the Mineral Planning Authority does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and that therefore it agrees with paragraph 17.8.2.6 of the Scoping Report that mineral resource safeguarding issues can be scoped out of the assessment.

9.4 **Mineral and Waste facility safeguarding**

There are no safeguarded existing mineral or waste facilities within the draft Order Limits. However, there is one consultation area for such a facility which

intersects with the Order Limits; namely the 400m consultation area for the Sporle with Palgrave Water Recycling Centre. The WRC is adjacent to part of the Central Panel Area. Safeguarding for these facilities is in place to ensure that non-waste development does not prejudice the continued operation of such sites as a result of sensitive receptors who might raise complaints regarding odour, for example. The Scoping Report does not refer to this facility and the potential for impacts on its continued operation should be assessed.

9.5 **Waste Management**
The Scoping Report does refer to the management of waste arising from the construction, operation and decommissioning of the proposed development. The application should assess the potential for impacts on waste management facilities to deal with this waste, with particular reference to the sites within Norfolk, following the proximity principle to deal with waste as close to its source, where practicable. This should be included within the Outline Construction and Decommissioning Environmental Management Plans included in the application.

9.6 Should you have any queries regarding the above comments please contact Richard Drake (Senior Planner) at [redacted]@norfolk.gov.uk

10. Lead Local Flood Authority (LLFA)

10.1 The LLFA have reviewed The High Grove Solar Farm Environmental Impact Assessment (EIA) Scoping Report Documents and wish to make the following comments.

10.2 In section 2.4.7.2 - The substation may end up outside of the draft Order Limits, however the LLFA would continue to expect the same level of flood risk assessment to be undertaken should the substation be located outside of the draft order limit.

10.3 In section 2.4.7.3, there is use of both metric and imperial measures. The LLFA requests the continuous use of the metric measurements through the project.

10.4 In section 2.4.8.1 indicates that a detailed operational drainage design for the proposed development would be provided after the development consent is provided. However, it is not clear what drainage solution would be provided and how much space would be required. Therefore, it would not be possible to ascertain whether there would be an increase in flood risk or not due to the proposed development. An outline drainage design for the operational and construction phase will be required to support the development consent.

In addition, section 2.4.8.1, the bullet point for access tracks and in section 2.4.9.4 and 19.7.2.2, the applicant indicates that a series of permanent permeable (compacted gravel) access tracks would be provided to maintain

and service the proposed development. The LLFA reminds the applicant that compacted material is considered impermeable and sustainable surface water management will be required for these tracks.

Additionally, section 2.4.9.4, the applicant indicates the scheme will avoid Flood Zones 2 and 3. However there is no mention of surface water flood flow routes and areas. The LLFA reminds the applicant to avoid all areas at 1% AEP plus climate change risk of flooding from all sources such as and including surface water. The LLFA will expect that all buildings and critical facilities, such as substations, will be place in areas outside of the 0.1% AEP and in accordance with the LLFA's advice.

10.5 As there are multiple locations within the proposed development. At present a Construction Environmental Management Plan (CEMP) is proposed to be provided. A high-level summary of the stages of the proposed development is provided in the submitted report. However, a phasing plan supported by a construction phase surface water drainage plan will also be required to demonstrate there is no increase in flood risk in the construction phase (further information is provided in the LLFA's Developer Guidance). At present, there is an indication that no construction phase drainage would be installed until stage 2 and 3. As there are alterations such as the development of access points and tracks that could lead to the increase in surface water runoff, suitable surface water management measures would be needed in stage 1 as well. Otherwise, the proposed development could be considered not in accordance with the principles of NPPF and sustainable drainage.

10.6 Please note, if there are any works proposed as part of this application that are likely to affect flows in a river or watercourse, then the applicant is likely to need the approval of either Norfolk County Council, the Environment Agency or the local Internal Drainage Board. In line with good practice, these organisations seek to avoid culverting where possible. For Norfolk County Council, the consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

10.7 The LLFA notes the anticipated 35 to 40 construction compounds identified in section 2.5.2.21. Further clarification on the location, duration and the surface water drainage arrangements for each of these construction compounds is requested to be included in the submission.

10.8 The LLFA notes that in section 2.5.4 on the decommissioning of the site, the applicant has only indicated the design life of the proposed development rather than the proposed lifetime of the proposed development. As these are two different matters and as the climate change allowances are based upon the proposed lifetime of the development, the LLFA requires the applicant to be

clear over how long the proposed development will operate for. In addition, the applicant indicates the decommissioning of the site would only be partial as the substation would not be under the control of the applicant at the time of decommissioning. The proposed access tracks may or may not be retained. This adds further uncertainty to the proposed lifetime of the development as at present the decommissioning appears to only relate to the removal of the solar panels and some of the local cables. Further clarification of the proposed development lifetime for the various assets in the different locations will be necessary to support the application. In addition, the decommissioning will need to confirm whether the site will be returned to its previous use and condition as it is not clear in the current information.

10.9 The LLFA notes that in section 19.2.4 in Table 19-3, the LLFA's developer guidance is not listed. This guidance provides the LLFA's developer advise in accordance with Paragraph 175a of NPPF. Therefore, the LLFA recommend the guidance is considered and used in the preparation of the supporting evidence base for this scheme.

10.10 In section 19.3 there appears to be incomplete sections that should have further attention to resolve the matter.

10.11 The current version of NPPF includes the requirement for all sources of flood risk to be fully assessed. In addition, NPPF requires the application of the sequential test for all sources of flood risk rather than relying upon only the flood zones. Therefore, the LLFA expects all sources including surface water (pluvial) and groundwater to be fully assessed in the FRA and the sequential test for this scheme.

10.12 The LLFA reminds the applicant to obtain the sewer records to ensure that all sources of flood risk are considered.

10.13 The LLFA notes that as the proposed scheme is not a road scheme the consideration of HEWRAT for the assessment of water quality is not appropriate. The LLFA advises that a water quality assessment for the proposed SuDs system will be required to support the application. The LLFA suggests the simple index approach or a suitable alternative from the CIRIA SuDs Manual (C753) should be applied to this proposed scheme.

10.14 The LLFA strongly recommend that any EIA includes, or any planning application for development is accompanied by an FRA and a surface water drainage strategy to address:

- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.

- How surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) (Paragraph 173 and 175) and the subsequent EN-1 and EN-5.

In this particular case this would include appropriate information on:

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.
- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Provision of surface water modelling of overland flow routes and mitigation provided to show how flood risk will not be increased elsewhere. This may include temporary culverts sized for the 1% Annual Exceedance Probability (AEP) plus climate change allowance.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases supported by the inclusion of appropriate information. It is important that the SuDs principles and hierarchies have been followed in terms of:
    - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level).
    - the SuDs components used within the management train (source, site and regional control) in relation to water quality and quantity.
    - identifying multifunctional benefits including amenity and biodiversity.

    - Onsite, infiltration testing, in accordance with BRE365 or equivalent should be undertaken to find out if infiltration is viable across the site and at the depth and location of any infiltration drainage feature. Infiltration testing should be undertaken 3 times in quick succession at each location.

- A surface water drainage system must be provided for the construction, operation and decommissioning of the project, including any temporary construction works.
- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

Further guidance for developers can be found on our website at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers

10.15 Should you have any queries with any of the above LLFA comments please contact the LLFA – LLFA@norfolk.gov.uk

11. Norfolk Fire and Rescue

11.1 Norfolk Fire & Rescue Service would like the following points confirmed as part of the scoping and also as requirements under any planning condition for this application, in line with the National Fire Chiefs Council guidance.

11.2 Battery Energy Storage Systems (BESS) rooms and buildings shall be dedicated use, i.e. not used for any other purpose and accessible only by those required to operate, maintain, test, or inspect the BESS equipment.

11.3 Locate BESS systems in non-combustible containers or enclosures at least 3 metres from other equipment, buildings, structures, and storage. This distance shall only be reduced when: a) a suitable fire-barrier (minimum 1-hour fire rated) is installed between the BESS unit and exposed buildings/ structures, b) exposed surfaces (typically exposed walls) are fire-resisting and blank (i.e. no openings), or c) BESS enclosures are constructed with fire-resisting blank walls and roofs.

11.4 Walk-in containers and other enclosures used to house BESS equipment should not exceed the dimensions of long “high cube” shipping containers, i.e. maximum dimensions, 16.2m long, 2.6m wide, 2.9m high.

11.5 BESS systems should be at least 15 metres from building High Voltage Alternating Current (HVAC) air inlets.

11.6 Where installation of BESS equipment in rooms forming part of buildings with other occupancy types cannot be avoided, these should be separated from other areas by minimum 2-hour fire rated construction.

11.7 The Battery Management Storage (BMS) should be configured to monitor potential failure conditions that could lead to a thermal runaway and shut down and isolate BESS units where any such conditions are detected.

11.8 For critical and significant BESS installations, install early detection of off-gases/electrolyte-vapour from thermal runaway events, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).

11.9 Provide smoke detection systems for all BESS equipment rooms and compartments, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).

11.10 BESS areas within sprinklered buildings and all BESS installations where sprinkler protection forms part of the fire strategy, should be provided with sprinkler protection, designed to provide a minimum density of discharge of 12.2mm/min over an assumed fire area of 230m2 (or area of room if smaller).

11.11 BESS rooms and enclosures should be provided with suitably designed explosion overpressure venting.

11.12 Suitable procedures shall be implemented to routinely inspect and test BESS thermal runaway and fire mitigation alarms and systems. Greater separation distances may be appropriate from critical buildings and installations and to meet specified strategic spatial fire separation expectations. Note: Whilst automatic fire suppression is unlikely to extinguish fire in individual battery cells that are undergoing thermal runaway, fire suppression can reduce fire intensity and assist in slowing and limiting fire propagation across battery modules and racks. It may be acceptable to reduce some of the above risk control measures where large-scale testing, such as testing to UL9540A or equivalent, demonstrates that adjusted mitigation measures are adequate.

11.13 Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be in close proximity of the BESS containers. − The water supply should be able to provide a minimum of 1,900 l/min for at least 2 hours. Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator.

11.14 The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.

11.15 The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to NFRS.

11.16 Environmental impact and risk assessment must be completed. This must include firefighting water run-off and potential containment and treatment. Air pollution must also be considered.

11.17 Should you have any queries with the above comments please contact: Tim Harper-Allison [redacted]@norfolk.gov.uk

12. Norfolk Property Services (NPS)

12.1 If Norfolk County Council (NCC) land is required for the proposed works NPS would request RWE consults directly with Jenna Browne [redacted]@norfolk.gov.uk) and Simone Crawford [redacted]@norfolk.gov.uk) at NCC County Farms as landowner, with regards to timescale, method of construction, impact on NCC land and compensation.

12.2 Should you have any queries with the above comments please contact Richard Smith [redacted]@nps.co.uk

13. Natural Environment

13.1 Ecology

Ecological Survey Requirements - The sites identified should be carefully refined, taking account of all relevant ecological impacts, including locally designated wildlife sites. It is also important that any desk study should include the collation of all relevant habitat and species data from the Norfolk Biodiversity Information Service (NBIS), including all Local Wildlife Site information. All surveys carried out will require to be up to date, therefore given the potential timescales involved with such a scheme, it may be necessary to carry out regular surveys throughout the course of the design stage to ensure all surveys are no more than 18 months old.

Ecological Reporting - The scheme will need to consider all ecological effects, both during construction and in-operation. The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and compensation provided. Impacts to Irreplaceable Habitats (e.g. Ancient Woodland) should be fully avoided. In addition, (dependant on timeline) the development will be expected to deliver the mandatory minimum 10% Biodiversity Net Gain (from late November 2025 for NSIPS) and contribute towards the Local Nature Recovery Strategy (LNRS).
Cumulative Impacts – given the proximity of other NSIPs in the area the EIA will need to address the cumulative impacts with these other projects and set out appropriate mitigation measures and indicate how this relates to BNG targets and to the LNRS.

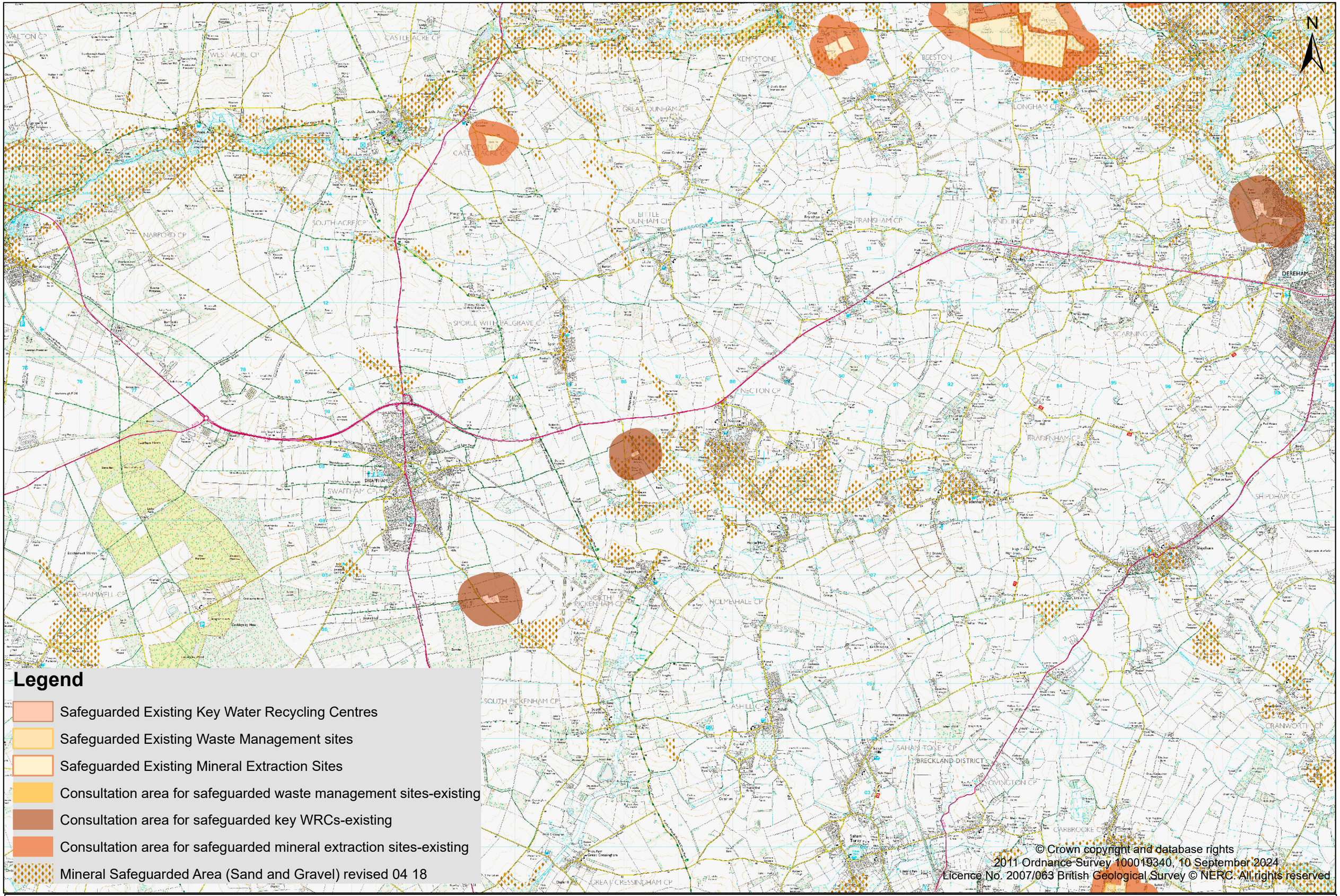
13.2 **Landscape**

A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment. This should consider all potential impacts, both during construction and in-operation, and the cumulative impacts with other NSIPs.

Where impacts cannot be avoided then **mitigation measures** will need to be identified. Whilst advanced planting and screening will not minimise all impacts, carefully planned incremental planting can be effective at minimising and softening the appearance of infrastructure in the landscape. Often layered planting starting some distance away can help to break up extensive views. This will be particularly important when considering the screening options for the substation, converter stations and integrated battery storage facility, where landscape and visual impacts have the potential to be significantly adverse. The massing, location and scale of the previous mentioned infrastructures should be considered to ensure both short distance and long-distance views are taken into account. In addition to layered planting consideration should be given to finishes, orientation of elements and siting of elements within the site to avoid continuous change on the horizon.

Impacts will ned to be considered from PRoW and the EIA will need to demonstrate how these impacts will be minimised / mitigated. Account will also need to be taken of proximity to housing and the need to avoid any potential impacts in relation to visual amenity; and “glint and glare”.

13.3 Should you have any queries with the above Natural Environment comments please contact the Natural Environment Team at neti@norfolk.gov.uk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FRANSHAM CP
WENDLING CP
NARFORD CP
SOUTH ACRE CP
DEREHAM
SPORLE WITH PAGRAVE CP
SCARNING CP
NECTON CP
BRADENHAM CP
SWAFFHAM
SWAFFHAM CP
SHIPDHAM CP
CHAMPFLEUR CP
NORTH PICKENHAM CP
HOLME HALE CP
SOUTH PICKENHAM CP
ASHILL CP
SAHAM TONEY CP
BRECKLAND DISTRICT
CARBROOKE CP
CRANWORTH CP
GREAT CRESSINGHAM CP
Legend
Safeguarded Existing Key Water Recycling Centres
Safeguarded Existing Waste Management sites
Safeguarded Existing Mineral Extraction Sites
Consultation area for safeguarded waste management sites-existing
Consultation area for safeguarded key WRCs-existing
Consultation area for safeguarded mineral extraction sites-existing
Mineral Safeguarded Area (Sand and Gravel) revised 04 18
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Norfolk County Council
10 September 2024

From: Planning Department
To: High Grove Solar
Subject: FW: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation
Date: 03 October 2024 16:49:07
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Dear Deb Glassop,

Thank you for consulting Norfolk Rivers Internal Drainage Board (via the Water Management Alliance) on this EIA Scoping case.

Having established that the proposed development (including the planned solar panel arrays and connecting cables) does not fall within the internal drainage district of the Norfolk Rivers Internal Drainage Board, we have no comment to make on this consultation.

Kind regards,

Judith

Judith Stoutt BSc (Hons), MSc
National Infrastructure Officer
Water Management Alliance
[redacted] | e:[redacted]@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk
What3Words: caring.employ.visit

WMA members: Broads Drainage Board, East Suffolk Water Management Board, King's Lynn Drainage Board, Norfolk Rivers Drainage Board, Pevensey and Cuckmere Water Level Management Board, South Holland Drainage Board, Waveney, Lower Yare and Lothingland Drainage Board

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From:	Before You Dig
To:	High Grove Solar
Cc:	Before You Dig
Subject:	RE: EXT:EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation
Date:	10 September 2024 15:29:08
Attachments:	~WRD0003.jpg image007.png image008.png image009.png image010.png image011.png image012.png image013.png

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Please use this online tool to find out which gas distribution network you need to contact:

https://www.energynetworks.org/operating-the-networks/whos-my-network-operator

Regards,

Andrea Powney

Administrative Assistant – Customer Operations Support
Northern Gas Networks

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From: High Grove Solar <highgrovesolar@planninginspectorate.gov.uk>
Sent: Tuesday, September 10, 2024 10:19 AM
Subject: EXT:EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation

From: [redacted]
To: High Grove Solar
Subject: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation
Date: 27 September 2024 11:26:19
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Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11. Application by RWE Renewables UK Solar and Storage Limited (the Applicant) for an Order granting Development Consent for High Grove Solar (the Proposed Development)

Environmental Statement (ES) Scoping Opinion

Thank you for consulting South Norfolk Council and Broadland District Council regarding the scoping opinion for High Grove Solar NSIP project. I can confirm that we will not be commenting and wish to defer to the Host Local Authority, Breckland Council.

Yours faithfully

Claire Curtis

Claire Curtis (Mrs)
Area Planning Manager and Nationally Significant Infrastructure Projects (NSIPs) Lead Officer
t [redacted]

One Team Beyond the Horizon logo

South Norfolk Council Logo

Ukraine Flag Logo

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From: High Grove Solar <highgrovesolar@planninginspectorate.gov.uk>
Sent: Tuesday, September 10, 2024 10:19 AM
Subject: EN0110010 - High Grove Solar - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed High Grove Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **8 October 2024.** The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Deb Glassop.

Deb Glassop | EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110010
Our Ref: 83792

Ms Deb Glassop
EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

8th October 2024

Dear Ms Glassop

Nationally Significant Infrastructure Project
High Grove Solar, Norfolk, EN0110010
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of

relevant issues into a specific Health Chapter section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted. OHID expand on the role of the health chapter within an ES below.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement [1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

With consideration to air pollution, we would like to highlight, particularly for the construction phase, that reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent. Reducing air pollution from construction activities, including vehicle transport and movements should be considered with the design phase.

Human Health and Wellbeing - OHID

This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted report OHID wish to make the following specific comments and recommendations:

[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

Population and Human health assessment

It is noted that population and human health will be considered within existing chapters and not form a separate chapter within the ES. Given the current knowledge of the scheme and potential impacts this appears to be a proportionate approach but does ignore the potential for cumulative effects from the project or nearby schemes.

Table 17.3 identifies local community facilities, but does not include Plowright Medical Centre in Swaffham, noted in para 13.5.3.12.

Recommendations

The cumulative effects assessment should consider the potential for population and human health effects.

Scoping out a separate population and human health chapter should be kept under review as more information becomes available. A separate population and human health chapter may be justified as the assessments develop.

The ES should list and plot all local community facilities within 500m of the scheme boundary.

Yours sincerely,

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration

From: [redacted]
To: High Grove Solar
Subject: Your Reference - EN0110010 - Our Reference - ENQ/24/1539 - High Grove Solar
Date: 13 September 2024 11:29:04

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Good morning – thank you for letter dated 10 September 2024. I can confirm on behalf of West Suffolk Council as Local Planning Authority, that it has no comments to make on the scoping consultation and does not require any further consultation on this matter.

Kind regards.

Dave

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West Suffolk Council
#TeamWestSuffolk

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