



Walpole Flexible Generation

Programme Document

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**Walpole Flexible
Generation**
A STATERA COMPANY

Applicant Cover Sheet:

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Applicant:	Walpole Flexible Generation Limited
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1. Introduction

The purpose of this document is to show the main steps that the project team anticipates taking during the preparation of a future application for development consent for the Walpole Flexible Generation (WFG) Project. This document will be kept up-to-date and maintained throughout the pre-application stage. A public version of the Programme Document will be published on the Applicant's website (walpoleflexgen.co.uk).

Updates to the Programme Document will be notified to the Planning Inspectorate and relevant statutory bodies, local authorities and other interested stakeholders.

The Programme Document is structured to provide a summary of the project and background, overview of the Planning Inspectorates pre-application service, the pre-application programme, main issues for resolution, engaging with statutory bodies, engaging with local authorities and pre-application risks.

This Programme Document has been produced with consideration of relevant guidance published by the Planning Inspectorate including the Nationally Significant Infrastructure Project Pre-Application Prospectus.

All references within the Programme Document to future project documentation, dates and future consultations to be undertaken, is subject to existing expectations and legislative requirements. Such information will therefore be subject to change considering any future changes to legislation, guidance or project specifics as may be relevant at that point in time.

2. Background to the Project

The Applicant

Walpole Flexible Generation Limited (hereinafter referred to as ‘the Applicant’) is proposing to construct and operate a flexible generation plant facility and battery energy storage system (BESS) of up to 2 GW capacity, known as the Walpole Flexible Generation Project, on land near Walpole Marsh, Wisbech, Norfolk (hereafter referred to as ‘the Proposed Development’). The Applicant is owned by Statera Energy Limited (‘Statera’).

Statera is a UK-based energy company that develops, owns and operates flexible generation, battery storage, pumped hydro and green hydrogen projects which will all provide critical grid balancing support in a future renewables-led system. These assets will help the UK build more renewable energy, more quickly, by providing the flexible capacity needed to balance the future grid during periods of extended shortfalls and excesses in renewable generation, due to the variability of wind and solar output. In turn, this technology will lower carbon emissions and deliver best value for energy users. Further information on Statera is available on the company website: <https://stateraenergy.co.uk/>.

The Project

The key components of the Proposed Development comprise:

- Flexible generation thermal plant (Gas Engines, Open Cycle Gas Turbine [OCGT] or Combined Cycle Gas Turbines [CCGT]) powered by either natural gas, hydrogen or a combination of natural gas and hydrogen combustion;
- Battery Energy Storage System (BESS);
- Project substation;
- Associated infrastructure, landscaping, access and enhancement or mitigation works, and;
- Cable connection route via underground cabling linking the project substation to the National Grid.

Planning Act

The Proposed Development will provide up to 2 GW of electrical generation capacity. Due to the amount of electricity generated the Proposed Development will constitute a Nationally Significant Infrastructure Project (NSIP) under Part 3 of the Planning Act 2008 (herein referred to as ‘the Act’). As an NSIP, planning permission can only be provided by the making of a Development Consent Order (DCO) by the relevant Secretary of State under the Act.

Other Consents and Licences

No other licences or non-planning consents have yet been identified as being necessary outside of any future DCO at this early stage. Such licences or non-planning consents will be identified as assessment work progresses.

Policy Background

The policy framework for examining and determining applications for NSIPs is set out within a suite of National Policy Statements (NPS). A summary of relevant NPS is set out at **Appendix A**.

3. The Planning Inspectorate's Pre-Application Service

The Walpole Flexible Generation Project is within the basic pre-application tier (Tier 1) as set out within Planning Inspectorate Nationally Significant Infrastructure Project Pre-Application Prospectus.

4. Pre-Application Programme

Engagement with the Planning Inspectorate

Meetings with the planning inspectorate will take place to discuss project progress and programme. These meetings will take place in advance of important stages for the project, such as but not limited to:

- In advance of EIA Scoping stage (Q3 2026)
- In advance of formal consultation stage (Q3 2027)
- In advance of Adequacy of Consultation Milestone (Q4 2027)
- In advance of DCO application submission (Q1 2028)

Additional meetings may be sought with the Planning Inspectorate should specific circumstances warrant these. Draft document review by the Planning Inspectorate may also be sought in advance of DCO application submission.

Planned Interactions with Statutory Bodies and Local Authorities

No interactions are yet arranged with statutory bodies and local authorities. The intention of the Applicant is for meetings with statutory bodies and local authorities to take place preceding the below main stages for the project:

- In advance of EIA Scoping stage (Q3 2026)
- In advance of formal consultation stage (Q3 2027)
- In advance of DCO application submission (Q1 2028)

Statement of Common Ground meetings will take place between Q1 2027 – Q1 2028. A discussion with the local authorities concerning the Statement of Community Consultation will also take place during Q2 2027.

Additional meetings may be sought should specific circumstances warrant these taking place

Consultation

Formal consultation on the project is anticipated to take place during Q2 2027. Informal briefing sessions locally are planned for Q4 2025 – Q1 2027. Formal consultation on the Statement of Community Consultation is anticipated for Q2 2027. Formal consultation on the project is planned for Q3 2027, with the Adequacy of Consultation Milestone planned for Q4 2027.

Application Submission

The Applicant anticipates that DCO application will be submitted in Q1 2028 (February).

An overview illustration of the project programme is provided below:

	2025	2026				2027				2028
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1
Engagement with Statutory Consultees and Local Authorities >	Introductory meetings with statutory consultees and Local Authorities. Including meetings to facilitate production of the SoCC ¹ .					Meetings to take place with stakeholders to progress statements of common ground.			Refinement of Statements of Common Ground with stakeholders.	
Project Stage >	Initial Assessments.					Drafting DCO ² and PEI ³			Preparation of Application and Completion of EIA ⁴	
					↑ ↑ A B	↑ C	↑ D	↑ E	↑ F	

A: Request for Scoping Opinion submitted

B: Planning Inspectorate Scoping Opinion

C: Consultation with Local Authorities on SoCC / Informal project briefing sessions locally

D: Formal Consultation

E: Adequacy of Consultation Milestone (AoCM)⁵

F: DCO Application Submission

¹ Statement of Community Consultation (**SoCC**): The SoCC is produced by the Applicant to establish the way it will consult with the local community at the Pre-Application stage.

² Development Consent Order (**DCO**): A Development Consent Order is a statutory instrument which provides development consent for Nationally Significant Infrastructure Projects under the 2008 Planning Act. Applications for such a consent is made to the Planning Inspectorate, who consider such applications and makes a recommendation to the Secretary of State, who will ultimately decide on whether development consent should be granted.

³ Preliminary Environmental Information (**PEI**): Preliminary Environmental Information for consultation bodies to develop an informed view of the likely significant environmental effects of the development. PEI may be replaced with different approach if affected by changes to pre-application procedures for NSIPs proposed by government.

⁴ Environmental Impact Assessment (**EIA**): Assessment of environmental impact of project.

⁵ Written submission of Adequacy of Consultation Milestone (**AoCM**) as set by the Nationally Significant Infrastructure Project Pre-Application Prospectus, discussions on adequacy of consultation will be completed with Planning Inspectorate in advance of AoCM written submission.

5. Main Issues:

The project is at an early stage. An initial assessment of main issues is summarised below alongside our approach to addressing each topic:

Main Issue	Resolution Approach ⁶	Programme
Areas at risk of flooding are known to exist within locality and parts of site sit within floodzone.	Flood risk will be included as a consideration for EIA. A Flood Risk Assessment will be undertaken. Suggested assessment approach will be set out within the Scoping Report.	Up to Q3 2026 on EIA Scoping and up to Q1 2028 for completion of Flood Risk Assessment.
Areas of high quality (best and most versatile) agricultural land known to exist within wider area.	Land use and agricultural land quality is a consideration for EIA and will be assessed as part of this. Suggested assessment approach will be set out within the Scoping Report.	Up to Q3 2026 on EIA Scoping and up to Q1 2028 for completion of Agricultural Land Assessment.
Number of projects within the area identified, including significant infrastructure projects nearby.	Project team to ensure that nearby significant projects are identified and relevant interactions are considered throughout project stages.	Throughout

The Applicant will be producing a 'potential main issues for examination' document for submission as part of the DCO application.

⁶ subsequent resolutions may be required after initial assessments and / or site survey

6. Engaging with Statutory Bodies

The Proposed Development is at an early stage and has yet to identify and contact statutory bodies who may be relevant. As such, no engagement with statutory bodies has taken place or has yet been arranged to take place in relation to the Proposed Development.

7. Engaging with Local Authorities

Relevant local authorities are anticipated to include:

- Norfolk County Council (Host)
- Kings Lynn and West Norfolk Borough Council (Host)
- North Norfolk (Neighbouring)
- Breckland Council (Neighbouring)
- Lincolnshire County Council (Neighbouring)
- Cambridgeshire County Council (Neighbouring)

The Proposed Development is at an early stage and no engagement with local authorities has taken place or has yet been arranged to take place in relation to the Proposed Development.

The Applicant intends to produce pre-application 'principal areas of disagreement summary statements' with affected local authorities, discussion on these has yet to take place.

8. Pre-Application Risks

No significant risk to the achievement of the pre-application stage has yet been identified. A Risk Register has been established for the project to identify and track potential risks to achievement of the pre-application stage. These risks will be reviewed internally by the project team and progressed with external stakeholders where necessary.

9. Other Matters:

No financial support agreements are in place between the Applicant and statutory/regulatory stakeholders. Such further agreements may be sought in the future.

Once SoCC has been finalised (see programme above) activities specified within this programme document will be cross-referenced to the contents of the SoCC as appropriate.

Non-statutory engagement activities or discussions may take place with local communities and stakeholders between main programme stages.

Appendix A

NPS for Overarching Energy (EN-1)

EN-1 provides the overarching NPS for energy and provides guidance for energy related NSIPs. EN-1 outlines UK Government policy on the need for such projects, including how applications will be assessed. EN-1 seeks to ensure that energy infrastructure development aligns with national energy objectives, including security of supply, affordability, and sustainability.

EN-1 places emphasis on the importance of the transition to a low-carbon economy and supports the development of renewable energy sources, while also addressing the need to achieve a diverse energy mix. This NPS provides an overarching policy framework for decisionmakers to balance the benefits of energy projects against potential impacts.

NPS for Natural Gas Electricity Generating Infrastructure (EN-2)

EN-2 provides policy guidance specific to the development of natural gas related electricity generation NSIPs, but also hydrogen gas-fired electricity generation infrastructure. As such, EN-2 is of specific importance to the Proposed Development. Building on the overarching policies provided by EN-1, EN-2 emphasises the importance of maintaining a reliable and affordable energy supply through natural gas electricity generation while new low-carbon technologies are developed and deployed.

EN-2 outlines the policy criteria for assessing applications for natural gas NSIPs, including consideration of related impacts and the need for such development to take place. EN-2 seeks to ensure that natural gas infrastructure is developed to support the UK Government's wider energy security and net-zero goals.

NPS for Renewable Energy Infrastructure (EN-3)

EN-3 provides specific guidance for the development of renewable energy projects. EN-3 complements overarching policy provided by EN-1 by detailing the need for renewable energy infrastructure to meet UK energy objectives and carbon reduction targets. EN-3 emphasises the importance of increasing electricity generation from renewable sources, such as wind, solar, and biomass, to support the transition to a low-carbon economy.

NPS for Electricity Networks Infrastructure (EN-5)

EN-5 provides specific guidance for the development of electricity network infrastructure in the UK. EN-5 emphasises the importance of developing infrastructure that can accommodate Theedlethorpe Flexible Generation Page 1 September 2025 increased electricity generation from renewable sources and ensure a reliable and secure supply.

EN-5 outlines the policy criteria for the consideration of applications for electricity network projects.

Each NPS will remain in force in its entirety unless withdrawn or suspended in whole or in part by the relevant SoS and are subject to SoS review to ensure that the contents of the NPS remains appropriate.