

SUNNICA ENERGY FARM

EN010106

Volume 7

7.2 Planning Statement

APFP Regulation 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009



Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

Sunnica Energy Farm

Planning Statement

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Executive summary

This Planning Statement has been prepared in respect of an application for a Development Consent Order (DCO) for the construction, operation (including maintenance) and decommissioning of Sunnica Energy Farm (the Scheme). The Scheme would comprise the installation of ground mounted solar photovoltaic (PV) panel arrays and associated infrastructure to generate electricity energy from the sun and transfer it to the national electricity transmission system (NETS) via a new connection and extension to the National Grid substation at Burwell. The Scheme also includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed. The Scheme is defined under the Planning Act 2008 as a Nationally Significant Infrastructure Project (NSIP) as it comprises a generating station in England with a capacity exceeding 50 megawatts (MW). It therefore requires a DCO from the Secretary of State for Business, Energy and Industrial Strategy (the SoS). This Planning Statement has been prepared on behalf of Sunnica Ltd. (the Applicant) to support the DCO application and should be read in conjunction with the other documents submitted with the Application. Sunnica Ltd. is a joint venture between Tribus Energy and PS Renewables.

Sections 1 – 3 of this Planning Statement provide details on the Scheme, its location and the Order limits as well as details of the operation, construction and decommissioning phases of the Scheme.

Section 4 sets out the Need and Benefits of the Scheme. The Government, through the Climate Change Act 2008, made the UK the first country in the world to set legally binding carbon budgets, aiming to cut emissions (versus 1990 baselines) by 34% by 2020 and by at least 80% by 2050. The Government has since increased its ambition to decarbonise the UK, committing to net zero carbon by 2050. The Scheme would contribute towards meeting these requirements and would also support the Government's emerging policy which indicates that new large solar energy infrastructure will be a key part of delivering the Government's objectives of a secure, affordable, and low carbon energy sector.

The Scheme also provides other benefits, including: delivery a biodiversity net gain of approximately 83% for habitat units, 16% for hedgerow units, and 1% for river units; protection of areas of previously unknown high value significant archaeology; new permissive routes; and employment opportunities, particularly during the construction phase.

This Planning Statement provides a detailed assessment of the Scheme against the policies which the Applicant considers are likely to be important and relevant to the SoS's decision. These policies are identified in Section 5: Legislative and Policy Context of this Planning Statement. The Scheme's compliance with the relevant legislation and planning policies are set out in Section 6: Planning Appraisal of the Scheme and is informed by the relevant chapters of the Environmental Statement.

Appendix B of this Planning Statement comprises a Planning Policy Accordance Table, which presents a consideration of the Scheme against all the national and local planning policies that the Applicant considers likely to be important and relevant to the SoS's decision.

Through its design and siting, the Scheme seeks to avoid and mitigate impacts on the environment and sensitive receptors, whilst ensuring that the Development will make a

significant contribution to the UK's urgent requirement for the delivery of large amounts of new renewable energy generation capacity and infrastructure.

Section 7 of this Planning Statement presents its conclusion following a detailed assessment of the Scheme and its likely effects on the environment and sensitive receptors. This concludes that whilst it has not been possible to avoid all impacts these have been minimised, where possible, through careful design and detailed mitigation strategies. When considered against national and local policies, the Scheme is in accordance with relevant policies, and with regard to specific policy tests set out in the relevant enacted and draft National Policy Statements (NPSs) for Energy, the national and local benefits of the Scheme are considered on balance to significantly outweigh its adverse impacts. This Planning Statement therefore concludes that Development Consent for the Scheme should be granted.

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1 Introduction

1.1 Overview

- 1.1.1 This Planning Statement has been prepared on behalf of Sunnica Ltd. (the Applicant) in relation to an application for a Development Consent Order (DCO) for Sunnica Energy Farm. The application for the DCO (the Application) is made to the Secretary of State for Business, Energy and Industrial Strategy (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 The Application is for the construction, operation (including maintenance) and decommissioning of Sunnica Energy Farm (the Scheme). The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) being a generating station as defined by Section 15 of the PA 2008, being above 50MW generating capacity and wholly in England. The Scheme is a new solar energy farm that will deliver electricity to the national electricity transmission network. The Applicant is proposing to install ground mounted solar photovoltaic (PV) panel arrays to generate electricity energy from the sun and combine these with a Battery Energy Storage System (BESS). Electricity will be generated at four sites: Sunnica East Site A, near Isleham in Cambridgeshire; Sunnica East B, near Worlington and Freckenham in Suffolk; Sunnica West Site A near Chippenham and Kennett in Cambridgeshire; and Sunnica West Site B, near Snailwell in Cambridgeshire (the 'Sites'). The Sites will connect to the Burwell National Grid Substation, near Burwell in Cambridgeshire and an extension to this substation is proposed to provide this connection.
- 1.1.3 Large scale solar generation is expected to make an essential contribution to the UK's renewable energy generating capacity to meet the UK's legally binding requirements to achieve net zero carbon emissions by 2050. The Scheme therefore provides an excellent opportunity to play a critical part of the portfolio of renewable energy generation urgently required in Great Britain (GB).

1.2 Purpose and Structure of this Planning Statement

- 1.2.1 A Planning Statement is not a prescribed document or specific requirement for an application for development consent, however it is submitted as part of a suite of supplementary documents which support the Application, in accordance with section 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (APFP 2009).
- 1.2.2 This Planning Statement considers and assesses the Scheme against relevant planning policy and other matters the Applicant considers are likely to be important and relevant to the Secretary of State's decision.
- 1.2.3 The Planning Statement is structured as follows:
- Section 1 provides an overview of the Scheme, the purpose of the Planning Statement, the Applicant, the legislative context for making this Application and the pre-application consultation undertaken by the Applicant.
 - Section 2 describes the existing land uses and characteristics of the Scheme Location and land affected by the powers of the DCO including planning history and local plan designations.

- c. Section 3 provides a summary of the Scheme.
- d. Section 4 summarises the need and benefits of the Scheme.
- e. Section 5 outlines the decision making framework; the planning policy context for the Scheme; and other legislation and policy considered by the Applicant to be important and relevant.
- f. Section 6 explains the Scheme's compliance with relevant planning policy identified in Section 5.
- g. Section 7 presents the overall planning balance and conclusions of this Planning Statement.
- h. Appendix A provides details of relevant planning history.
- i. Appendix B presents a table that sets out the compliance of the Scheme with individual planning policies.
- j. Appendix C provides illustrative figures supporting this Planning Statement.
- k. Appendix D provides an assessment of the Scheme's harm to designated heritage assets.

1.3 The Applicant

- 1.3.1 The Applicant is Sunnica Limited, a joint venture between Tribus Clean Energy Limited and PS Renewables, two established solar energy companies.
- 1.3.2 On 11 November 2020, Ofgem granted Sunnica Limited a licence to generate electricity under section 6(1)(a) of the Electricity Act 1989. As such, the Applicant is a statutory undertaker.

1.4 Legislative Context

- 1.4.1 The Scheme is defined as a NSIP under Sections 14(1)(a) and 15(2) of the PA 2008 as it is for the construction of an onshore generating station in England exceeding 50MW. The PA 2008 requires a DCO to be obtained for the development of NSIPs.
- 1.4.2 The Scheme as a whole will substantially exceed the 50MW generation threshold, as would each of Sunnica East Site A, Sunnica East Site B and Sunnica West Site A, individually. It is a single development, being progressed by a single applicant and will connect to the national electricity transmission system via a single connection under a single connection agreement. The constituent Sites could not come forward alone as it would not be viable to install the grid connection without the scale of development that is proposed, and further, the Sites also share common facilities which demonstrate the intrinsic relationship between them. Examples of this include the onsite substations, BESS and warehouses. In addition, the separation of the Sites is part of the iterative design process which Sunnica has progressed which delivers designed-in mitigation and which in turn reduces the overall environmental impact. For example, one large contiguous site would lead to increased landscape and visual impacts on the host community when compared with the approach Sunnica has taken. As such the

Applicant considers the design solution of the Sites, which each form part of the single solar generating station connected to the national electricity transmission system by the same cable under the same connection agreement is an intrinsic part of its mitigation strategy to reduce the impact on the environment and the host communities.

- 1.4.3 The PA 2008 prescribes that the Secretary of State is responsible for determining the application for development consent, with the power to appoint an Examining Authority of appointed persons to manage and examine the application. In this role, the appointed Examining Authority, normally appointed through the Planning Inspectorate, will make procedural decisions and examine the application and make a recommendation to the Secretary of State who will then decide whether to grant a DCO.
- 1.4.4 In accordance with Section 104(2) of PA 2008, the Secretary of State is required to have regard to any relevant National Policy Statement (NPS) where it has effect, amongst other matters, when deciding whether or not to grant a DCO. NPSs set out the policy basis for NSIP developments. For energy NSIPs, as well as an overarching NPS, the relevant NPSs refer to specific technologies and there is currently no adopted NPS which includes solar development. Therefore, there is no specific technology NPS that “has effect” for the Scheme. The Application will therefore be determined in accordance with Section 105 of the PA 2008.
- 1.4.5 Section 105(2) of the PA 2008 provides that in deciding the Application, the Secretary of State must have regard to any local impact report prepared by the relevant local authorities, matters that may be prescribed and any other matters which the Secretary of State “thinks are both important and relevant” to their decision. The Applicant considers that adopted NPSs EN-1, EN-3 and EN-5 are all important and relevant to the Secretary of State’s decision.
- 1.4.6 The Scheme is considered to be ‘EIA development’ as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) requiring an Environmental Impact Assessment (EIA). An Environmental Statement (ES) has therefore been prepared and is submitted with the application for a DCO [EN010106/APP/6.1-6.4].
- 1.4.7 A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and authorisations, where specified. Details of the consents and authorisations included in the DCO are explained in the **Explanatory Memorandum to the draft DCO [EN010106/APP/3.2]** and a **Consents and Agreements Position Statement [EN010106/APP/3.3]** explains those other consents and licenses that are or may be required under other legislation which will be sought separately from the DCO for the construction and operation of the Scheme.
- 1.4.8 Section 115 of the PA 2008 also states that a DCO can include consent for ‘associated development’, which is development that is not an NSIP in its own right, but is associated with the NSIP. The NSIP and associated development are defined in Schedule 1 of the draft DCO [EN010106/APP/3.1] and explained in the Explanatory Memorandum to the draft DCO [EN010106/APP/3.2].

- 1.4.9 The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are summarised in section 3 of this Planning Statement.

1.5 Pre-application Consultation

- 1.5.1 The Applicant adopted a staged approach to pre-application consultation on the Scheme.
- 1.5.2 An informal, non-statutory consultation was carried out between 17 June 2019 and 28 July 2019. Statutory consultation was undertaken from 22 September 2020 through to 18 December 2020, following the publication of the Preliminary Environmental Information (PEI) Report.
- 1.5.3 Targeted consultations were also undertaken between 18 June 2021 and 24 September 2021 following changes to the Order limits requiring further targeted consultation in respect of those specific changes.
- 1.5.4 The pre-application consultation undertaken by the Applicant is documented within the **Consultation Report [EN010106/APP/5.1]** and its appendices **[EN010106/APP/5.2]** submitted with the Application. This demonstrates how the Applicant's consultation complied with statutory requirements and was informed by relevant guidance. The **Consultation Report [EN010106/APP/5.1]** and its appendices also set out that the Applicant has carried out extensive consultation with other key stakeholders from an early stage in, and throughout, the project. At Table 2-1, it sets out that early engagement meetings were held in 2019 with bodies including Host Authorities, Highways England, Historic England, the Jockey Club and Parish Councils. At Table 2-5 the **Consultation Report [EN010106/APP/5.1]** summarises further engagement with important stakeholders such as the Host Authorities, local Wildlife Trusts, Natural England, Historic England, affected land owners, Parish Councils and the RSPB. This engagement has played an important role in informing the development of the Scheme and the Application. In addition, paragraph 5.2.23 of the **Consultation Report [EN010106/APP/5.1]** explains that the Applicant has developed its proposals for the BESS element of the Scheme in consultation with local fire authorities and the Health and Safety Executive (HSE).

2 The Scheme Location and Order Limits

2.1 Overview

- 2.1.1 The Scheme is located within the administrative areas of Cambridgeshire County Council (CCC); Suffolk County Council (SCC); East Cambridgeshire District Council (ECDC) and West Suffolk Council (WSC)¹. These are the host authorities for the Scheme as defined by section 43(1) of the PA 2008 (the 'Host Authorities').
- 2.1.2 **Figure 2-1** illustrates the Order limits of the Scheme within its administrative context. The Order limits define the area covered by the powers set out in the DCO.
- 2.1.3 Electricity will be generated at four sites which are located within Suffolk and Cambridgeshire:
- a. Sunnica East Site A: Land that forms part of the Sunnica East site, located approximately 3.5 kilometres ('km') east of Mildenhall, 0.5km south-east of Isleham and 0.6km south-west of West Row;
 - b. Sunnica East Site B: Land that forms part of the Sunnica East site, is located approximately 1.5km south-east of Mildenhall, 1km east of Freckenham and immediately south of Worlington;
 - c. Sunnica West Site A: Land that forms part of the Sunnica West site, is located approximately 7km to the east of Burwell, immediately north of the A14 at Newmarket; and
 - d. Sunnica West Site B: Land that forms part of the Sunnica West site, is located approximately 5.5km to the east of Burwell and 0.5km north of Snailwell.
- 2.1.4 Collectively, these are referred to as the 'Sites' and have a combined area of 981ha.
- 2.1.5 The Order limits include land for the associated electrical infrastructure for connection to the national electricity transmission network. This includes land for Grid Connection Route A linking Sunnica East Site A, Sunnica East Site B and Sunnica West Site A; and land for Grid Connection Route B linking Sunnica West Site A with Sunnica West Site B and onto to the extension proposed at the Burwell National Grid Substation, west of the village of Burwell in Cambridgeshire. Cabling will run within the Sites but does not constitute part of the Grid Connection Route, which is limited to the cabling between Sites to the Burwell Substation.
- 2.1.6 In addition, there are a number of isolated pockets of land required for temporary traffic management requirements. The Land Plans **[EN010106/APP/2.1]** illustrate the land required for the Scheme (the Order land).

¹ West Suffolk Council was formed in April 2019 following the merging of Forest Heath District Council and St Edmundsbury Borough Council
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- 2.1.7 The following sections provide an overview of the existing context and characteristics of the Sites; Grid Connection Route A and Grid Connection Route B; and the location of the connection to the Burwell National Grid Substation Extension. In addition, relevant planning history, development plan allocations and safeguarded areas and the reasons for selecting the Scheme location are discussed.

2.2 The Sites

Sunnica East Site A

- 2.2.1 Sunnica East Site A encompasses an area of approximately 223ha which straddles the SCC, CCC, WSC and ECDC administrative boundaries. **Figure 2-2** illustrates the location and environmental designations within and surrounding Sunnica East Site A.
- 2.2.2 Land use across Sunnica East Site A is a mix of pig and arable farming, based around Lee Farm. The topography of the land is low, lying between 5-15m Above Ordnance Datum (AOD). Landscape features within Sunnica East Site A include agricultural fields interspersed with individual trees, hedgerow, linear tree belts and farm access tracks. The Lee Brook flows from West Row to Freckenham and crosses through the central section of Sunnica East Site A.
- 2.2.3 The local road network serving Sunnica East Site A is illustrated on **Figure 2-3**. Beck Road, which runs south from Isleham and joins Isleham Road to the east, bisects Sunnica East Site A. A small section of Ferry Lane runs parallel to the eastern boundary of Sunnica East Site A. Three Public Rights of Way (PRoW) are located within the boundary of Sunnica East Site A as shown on **Figure 2-4**.
- 2.2.4 The area immediately surrounding Sunnica East Site A comprises several small rural villages, including Isleham to the north-west and West Row to the north-east. The nearest residential receptors are located 500m west of Sunnica East Site A along Beck Road, Isleham and 700m south along East View, Freckenham.
- 2.2.5 **Chapter 7: Cultural Heritage** of the Environmental Statement (ES) **[EN010106/APP/6.1]** identifies designated heritage assets within a 1km study area of the Order limits. There are no designated heritage assets within Sunnica East Site A. Designated heritage assets within the study area for Sunnica East Site A are shown on **Figure 2-5** and comprise:
- a. two Scheduled Monuments:
 - i. 'Lime kilns on east side of High Street' (NHLE 1006871) in Isleham and is located approximately 850m to the north-west of Sunnica East Site A.
 - ii. 'The remains of Freckenham Castle' (NHLE 1006070) which is located approximately 1km south of Sunnica East Site A.
 - b. The Grade I Church of St Andrews (NHLE 1126475) in Isleham is approximately 950m north west of the Sunnica East Site A boundary. Grade II Listed buildings are concentrated in the villages of Freckenham, Isleham and West Row.

- c. Conservation Areas within 1km of Sunnica East Site A include Freckenham and Isleham.

- 2.2.6 **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1] identifies Sites of international conservation value (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites) within 10 km of the Order limits as well as any SACs within 30km of the Order limits where bats are noted as the, or one of, the qualifying features. It also identifies statutorily designated sites of national nature conservation value, e.g. Sites of Special Scientific Interest (SSSIs) and Local Nature Reserves (LNRs) within 2km of the Order limits. Nationally and internationally designated nature conservation sites within these study areas are illustrated on **Figure 2-2**. Chippenham Fen SSSI and National Nature Reserve (NNR), which forms part of the Fenland SAC and Chippenham Fen Ramsar, is located approximately 2.8km to the south of Sunnica East Site A. The Breckland SPA is located approximately 4.8km to the east of Sunnica East Site A.
- 2.2.7 **Appendix 12B: Soils and Agriculture Baseline Report** of the Environmental Statement [EN010106/APP/6.2] classifies approximately 72% of Sunnica East Site A as Agricultural Land Classification (ALC) Grade 3b with the remainder of Sunnica East Site A being ALC Grade 4. A small area of non-agricultural land can be found in the north-eastern corner of Sunnica East Site A.
- 2.2.8 Sunnica East Site A is located predominantly within Flood Zone 1, with small areas Flood Zones 2 and 3 associated with the Lee Brook within the western extent, and also north from the River Lark.

Sunnica East Site B

- 2.2.9 Sunnica East Site B encompasses an area of approximately 319ha within the WSC and SCC administrative areas. **Figure 2-2** illustrates the location and environmental designations within and surrounding Sunnica East Site B. The Site is within the countryside identified on the Former Forest Heath area Policies Maps 2019.
- 2.2.10 Land use across Sunnica East Site B is predominantly arable farming. The topography of Sunnica East Site B is relatively flat. It varies between 40m AOD and 10m AOD towards the east of Sunnica East Site B (south-east of Worlington), to 10-15m AOD in the remainder of Sunnica East Site B. The landscape features within Sunnica East Site B consist of agricultural fields interspersed with individual trees, hedgerow, linear tree belts, small woodland blocks, farm access tracks, and local transport roads (including the B1085).
- 2.2.11 The area immediately surrounding Sunnica East Site B comprises several small rural villages, including Worlington immediately to the north, Barton Mills approximately 1km to the north-east and Freckenham 1.5 km to the west. The village of Red Lodge is located approximately 0.5km east beyond the A11 which forms part of the strategic highway network managed by National Highways. The nearest residential receptors to the southeast are located at Acacia Close, Red Lodge, which is approximately 450m east of Sunnica East Site B beyond the A11. Residential properties are also located approximately 250m south west of Sunnica East Site B at Badlingham Road, Chippenham; and 20m north, off Freckenham Road, Worlington.

- 2.2.12 Industrial land uses adjoin the A11 to the south of Sunnica East Site B and include a vehicle dismantling site. There is also the Lindcoly Country Kennels and Cattery located to the west, north of Elms Road. The operational areas of Worlington Quarry are located adjacent to the east and include a ready mix concrete plant. A 7.5 MW peak capacity solar farm is situated 400m to the south-east of Sunnica East Site B. The Bay Farm Power Ltd Anaerobic Digestion plant is located approximately 250m to the south. Further discussion regarding the relevant planning history within and adjacent to the Sites is provided below in section 2.4.
- 2.2.13 The local transport network shown in **Figure 2-3** comprises the A11, which runs adjacent to the eastern and southern boundary of Sunnica East Site B and forms part of the strategic road network, and several local roads. These include: Elms Road (which bisects Sunnica East Site B to the south); Newmarket Road (which runs from Worlington to Red Lodge and bisects Sunnica East Site B to the east); Golf Links Road to the north-east of Sunnica East Site B; and B1102 Freckenham Road which runs along the north-west of Sunnica East Site B. One PRoW is located within the boundary of Sunnica East Site B and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington.
- 2.2.14 **Chapter 7: Cultural Heritage** of the Environmental Statement **[EN010106/APP/6.1]** identifies designated heritage assets within a 1km study area of the Order limits. There are no designated heritage assets within Sunnica East Site B. Designated heritage assets within the study area for Sunnica East Site B are shown on **Figure 2-5** and comprise:
- a. The 'Bowl barrow on Chalk Hill, 380m north-west of Chalkhill Cottages' (NHLE 1018097) Scheduled Monument which is located immediately south of the eastern boundary; and
 - b. The Grade I Church of All Saints (NHLE 1037585) in Worlington, is approximately 570m north of Sunnica East Site B. The remaining listed buildings are Grade II and are concentrated in the village of Worlington to the north of the Site and the hamlet of Badlingham to the south.
- 2.2.15 **Chapter 8: Ecology** of the Environmental Statement **[EN010106/APP/6.1]** identifies Sites of international conservation value (SACs, SPAs and Ramsar sites) within 10 km of the Order limits as well as any SACs within 30km of the Order limits where bats are noted as the, or one of, the qualifying features. It also identifies statutorily designated sites of national nature conservation value, (e.g. SSSIs and LNRs) within 2km of the Order limits. Nationally and internationally designated nature conservation sites within these study areas are illustrated on **Figure 2-2**. Red Lodge Heath SSSI is located approximately 750m to the south-east of Sunnica East Site B, beyond the A11. Chippenham Fen SSSI and NNR, which forms part of the Fenland SAC and Chippenham Fen Ramsar, is located approximately 2.6km to the south-west of Sunnica East Site B. Breckland SPA is located approximately 1.4km to the north-east of Sunnica East Site B. There are two County Wildlife Sites (CWS) within the boundary of Sunnica East Site B: Badlingham Lane CWS and Worlington Heath CWS located in the northern area close to Worlington as shown on **Figure 2-2**.

2.2.16 **Appendix 12B: Soils and Agriculture Baseline Report** of the Environmental Statement [EN010106/APP/6.2] classifies Sunnica East Site B as predominantly Grade 4 agricultural land, with approximately 13.5% Grade 3b and approximately 0.7% Grade 3a within the northern area of Sunnica East Site B.

2.2.17 Sunnica East Site B is located entirely within Flood Zone 1 and therefore at a low risk of fluvial and tidal flooding.

Sunnica West Site A

2.2.18 Sunnica West Site A encompasses an area of approximately 373ha within the ECDC and CCC administrative areas. **Figure 2-6** illustrates the location and environmental designations within and surrounding Sunnica West Site A.

2.2.19 Land use across Sunnica West Site A consists of agricultural fields bound by trees, managed hedgerows, tree shelter belts, small woodland and copses, and farm access tracks. In terms of topography, Sunnica West Site A is generally flat. At the western edge of Sunnica West Site A the landform rises from the A14, at 30m AOD, to 40m AOD before falling back to Chippenham Road at 35m AOD. In contrast, the landform falls very gradually across the central part of Sunnica West Site A, from the junction of the A14 and A11 at 25m AOD, to the edge of Chippenham Park, at 20m AOD. Similarly, in the eastern part of Sunnica West Site A, the landform falls from La Hogue Farm, at 30m AOD, northwards towards the unnamed stream bordering Chippenham Park at 20m AOD, whilst remaining generally flat across Dane Hill and Halfmoon Plantation to the south, at 30m AOD.

2.2.20 A straight tree-lined avenue bisects the agricultural fields within the central section of Sunnica West Site A and forms part of a former carriageway to Chippenham Hall, which is located to the north. This forms part of the Chippenham Hall Registered Park and Garden.

2.2.21 The surrounding landscape comprises regular shaped arable fields interspersed with managed hedgerows, tall shelter belts of trees and in the Chippenham Hall area, a parkland landscape with mature individual trees. Sunnica West Site A is approximately 1km south of the village of Chippenham and approximately 0.3km west of the village of Snailwell. Leisure and retail uses nearby include The Wild Tracks Outdoor Activity Park which is immediately west of the A11 and lies 350m north of Sunnica West Site A and the La Hogue Farm Shop, which is approximately 330m to the north of Sunnica West Site A. The nearest residential receptors are located approximately 300m west of Sunnica West Site A at The Green, Snailwell, as well as the RF Tillbrook & Sons Farmhouse approximately 250m east, La Hogue Hall and Dane Hill Farm, Newmarket, which are approximately 120m east of Sunnica West Site A. In addition to residential properties the Arran House Stud Bed & Breakfast, Kennett is 100m east of Sunnica West Site A.

2.2.22 Much of the surrounding area of Sunnica West Site A is also characterised by grazed paddocks, horse gallops and exercise tracks. A horse training ground known as the Gallops, extends from the north of the A14 to border Snailwell and is adjacent to the western boundary of Sunnica West Site A. Other equestrian land uses principally border Newmarket, with the British Riding School approximately 0.9km to the south west situated between the A14 and Newmarket railway line to the northeast of Newmarket; the Limekilns, consisting of a

triangular parcel of land between the A1304 and Well Bottom road, approximately 450m south of Sunnica West Site A.

2.2.23 The local transport network is shown on **Figure 2-3**. The A14/A11 junction (Junction 38 of the A14) is located immediately to the south-east of the Sunnica West Site A boundary. The A11 then runs to the north where Sunnica West Site A is located either side of this road. The north eastern area of Sunnica West Site A is located east of the A11. The main railway line connecting Newmarket to Bury St Edmunds runs parallel to the A14. Snailwell 5 bridleway (PRoW) runs along the south-west boundary of Sunnica West Site A. Snailwell 1 PRoW crosses the land to the north-west of Sunnica West Site A. No PRoWs are situated within Sunnica West Site A itself.

2.2.24 **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1] identifies designated heritage assets within a 1km study area of the Order limits. There is one scheduled monument and one Registered Park and Garden (RPG) that fall partly within Sunnica West Site A. Designated heritage assets within the study area for Sunnica West Site A are shown on **Figure 2-7** and comprise:

- a. 'Four bowl barrows (NHLE 1015246) north of the A11/A14 junction, part of the Chippenham barrow cemetery' Scheduled Monument at the south-eastern extent within Sunnica West Site A. This comprises four separate locations adjoining the A14.
- b. 'The Rookery bowl barrow, part of the Chippenham barrow cemetery (NHLE 1015243), 250m south of Waterhall Farm' Scheduled Monument within 200m, to the south of the A11.
- c. The 'Hilly Plantation bowl barrow, part of the Chippenham barrow cemetery (NHLE 1015245), 500m south-west of Waterhall Farm' Scheduled Monument, within 200m, to the south of the A11.
- d. Chippenham Hall (NHLE 1000615) Grade II RPG part of which, known as the Avenue, bisects Sunnica West Site A. The Grade II Chippenham Hall is located to the north within the walled boundary of the park along with Grade II* lodges and gateway (NHLE 1126376) and Grade II* stable block (NHLE 1126375).
- e. Grade II Listed Building Waterhall Farmhouse which is approximately 120m east of Sunnica West Site A on the southern side of the A11 to the west and La Hogue / Chippenham Road to the east.
- f. Conservation areas in Snailwell to the west and Newmarket to the south.

2.2.25 **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1] identifies Sites of international conservation value (SACs, SPAs and Ramsar sites) within 10 km of the Order limits as well as any SACs within 30km of the Order limits where bats are noted as the, or one of, the qualifying features. It also identifies statutorily designated sites of national nature conservation value, (e.g. SSSIs and LNRs) within 2km of the Order limits. Nationally and internationally designated nature conservation sites within these study areas are illustrated on **Figure 2-6**. Chippenham Fen SSSI and NNR which forms part of the Fenland

SAC and Chippenham Fen Ramsar is located approximately 1km north-west of Sunnica West Site A. Newmarket Heath SSSI is located approximately 1.1km to the south of Sunnica West Site A, beyond the A14. Chippenham Avenue Fields CWS is located adjacent to the northern section of Sunnica West Site A.

2.2.26 **Appendix 12B: Soils and Agriculture Baseline Report** of the **Environmental Statement [EN010106/APP/6.2]** classifies approximately 61% of the Site as Grade 3b ALC, with approximately 20% Grade 4 ALC and approximately 9% Grade 3a ALC.

2.2.27 The majority of Sunnica West Site A lies in Flood Zone 1, however, an area of Flood Zones 2 and 3 encroaches into Sunnica West Site A from an ordinary watercourse along the northern boundary (a tributary of the Lee Brook). These Flood Zones then extend further into Sunnica West Site A in a south-easterly direction perpendicular to the ordinary watercourse.

Sunnica West Site B

2.2.28 Sunnica West Site B encompasses an area of approximately 66ha and lies within CCC and the ECDC administrative areas. **Figure 2-6** illustrates the location and environmental designations within and surrounding Sunnica West Site B.

2.2.29 Land use across Sunnica West Site B is mainly arable farming with avenue planting a characteristic of the immediate area, with mature trees present within Sunnica West Site B and newer tree planting evident along the Chippenham Road. The River Snail flows along the western and southern edges of Sunnica West Site B, and under Snailwell Road. The landform rises from the River Snail to the eastern edge of Sunnica West Site B, at 15m AOD.

2.2.30 To the west of Sunnica West Site B, there are commercial and industrial land uses along the A142 (Newmarket Road / Fordham Road) and to the south of Snailwell Road. The village of Snailwell is located 0.5km to the south. There are no residential receptors in close proximity to Sunnica West Site B.

2.2.31 The local transport network is shown on **Figure 2-3**. The A142 is located 370m to the west, the A14 is located 1.9km to the south, and Snailwell / Fordham Road to the south-west. The railway line connecting Newmarket to Ely runs in a north-west direction from Newmarket, approximately 600m to the south-west of Sunnica West Site B.

2.2.32 **Chapter 7: Cultural Heritage** of the Environmental Statement **[EN010106/APP/6.1]** identifies designated heritage assets within a 1km study area of the Order limits. There are no designated heritage assets within Sunnica West Site B. Designated heritage assets within this study area for Sunnica West Site B are shown on **Figure 2-7** and include:

- a. A Scheduled Monument which is the 'Roman villa south of Snailwell Fen' (NHLE 1006868) which is located along the western boundary of Sunnica West Site B, on the western side of the River Snail.
- b. Two Grade II* listed buildings within Snailwell approximately 600m to the south - the Church of St Peter (NHLE 1331773) and the Old Rectory (NHLE

1331772) - and Grade II Fordham Abbey (NHLE 1126354) approximately 750m north west of Sunnica West Site B.

c. Snailwell Conservation Area is to the south.

2.2.33 **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1] identifies Sites of international conservation value (SACs, SPAs and Ramsar sites) within 10km of the Order limits as well as any SACs within 30km of the Order limits where bats are noted as the, or one of, the qualifying features. It also identifies statutorily designated sites of national nature conservation value, (e.g. SSSIs and LNRs) within 2km of the Order limits. Nationally and internationally designated nature conservation sites within these study areas are illustrated on **Figure 2-6**. Chippenham Fen SSSI and NNR, which forms part of the Fenland SAC and Chippenham Fen Ramsar, is located directly adjacent to the north. The Snailwell Meadows SSSI is located directly adjacent to the south of Sunnica West Site B.

2.2.34 **Appendix 12B: Soils and Agriculture Baseline Report** of the **Environmental Statement** [EN010106/APP/6.2] classifies Sunnica West Site B as almost entirely Grade 3b agricultural land. An area of non-agricultural land can be found towards the south west and north west of Sunnica West Site B as well as two linear belts of land within Sunnica West Site B.

2.2.35 The majority of Sunnica West Site B is located within Flood Zone 1. Where Sunnica West Site B adjoins the River Snail, at the north-western and south-western boundaries, the land comprises small areas of Flood Zones 2 and 3.

2.3 The Grid Connection Routes

2.3.1 The Scheme will be connected to the existing Burwell National Grid Substation.

2.3.2 The Cable Corridor for Grid Connection Route A (see **Figure 2-8**) runs between Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. Heading south-east from Sunnica East Site A, Grid Connection Route A crosses agricultural land and the B1102 immediately north of Sunnica East Site B. The route then runs south from Sunnica East Site B crossing the River Kennett, Havacre Meadows and Deal Nook CWS and agricultural land. The route then crosses the Chippenham footpath 49/7, before passing approximately 20m west of the Chippenham Gravel Pit CWS and crossing the B1085, before then joining Sunnica West Site A.

2.3.3 The first part of Grid Connection Route B connects Sunnica West Site A with Sunnica West Site B. This crosses agricultural land, the Chippenham Road and Snailwell 1 PRow before joining Sunnica West Site B.

2.3.4 Heading west from Sunnica West Site B, the Grid Connection Route B crosses the River Snail and a PRow 92/19 (see **Figure 2-9**). The route passes to the north of the LGC bioanalytical centre and Turners of Soham logistics development which are located to the south of Fordham before crossing the railway line and the A142 Newmarket/Fordham Road.

2.3.5 The route then crosses agricultural fields, a number of roads including the B1102 and various watercourses, including the Burwell Lode, New River as well as a

number of drainage ditches associated with Burwell Fen, Little Fen, the Broads, and agricultural drains and the Burwell Waste Water Treatment Works before connecting into the proposed extension to Burwell National Grid Substation, off Newnham Drove.

- 2.3.6 Given the watercourses (River Snail, New River, Burwell Lode) present along the route, Grid Connection Route B passes through multiple areas of Flood Zones 2 and 3.

2.4 Burwell National Grid Substation

- 2.4.1 The Scheme is proposed to connect into the Burwell National Grid Substation which is located adjacent to Newnham Drove, approximately 350m west of the village of Burwell in Cambridgeshire. The Burwell National Grid Substation consists of tall transformers and associated structures, and pylon towers extend northwards from the substation, where the land use is agricultural, across Burwell Lode and West Fen watercourses. There is a block of woodland in the south-west part of Burwell, with mature tree belts extending adjacent to Newnham Drove and around the substation.
- 2.4.2 The Scheme requires an extension to the substation and therefore two potential areas are proposed. Burwell Substation Extension Option 1 land is located approximately 60m east and south east of the existing substation, adjacent to Weirs Drove, approximately 100m south west of the nearest residential properties in Burwell which are on Murton Close. This land is currently in agricultural use and is within National Grid land ownership. Burwell National Grid Substation Extension Option 2 land is located to the north of Newnham Drove and the existing substation, approximately 360m north west of the nearest residential properties, which are on Murton Close in Burwell. This land is also in agricultural use. Only one option would be constructed, which is controlled by a Requirement in Schedule 2 to the draft DCO.
- 2.4.3 The areas proposed for the Burwell National Grid Substation Extension are shown to be in Environment Agency Defended Flood Zone 3a and 2, however, more recent mapping undertaken by ECDC indicate large reductions in Flood Zone 3a and 2 areas and place the locations within Flood Zone 1.

2.5 Other Land Required within the Order Limits

- 2.5.1 Other land required within the Order limits includes small areas of highway which require temporary changes to the highway to facilitate construction access, such as the removal of street furniture. These are shown on the **Works Plans [EN010106/APP/2.2]**.

2.6 Relevant Planning History, Development Plan Allocations and Safeguarded areas

Introduction

- 2.6.1 A review of the planning history for the land within the Order limits and the surrounding area has been undertaken to assist with the consideration of any land use conflicts and associated planning policy compliance. The review has used the planning websites of the Host Authorities as well as feedback from the Host Authorities and, where possible, landowners.

- 2.6.2 Land allocated for development or safeguarded in adopted and emerging local planning policy documents has also been identified to consider future land use impacts of the Scheme.

Planning history within the Order limits

- 2.6.3 Within the Order limits there are limited planning approvals due to the agricultural nature of most of the current land use, particularly for the Sites. The planning history within the Order limits does include extant and proposed energy, mixed use, employment and mineral planning permissions which have been approved within the past 20 years. **Figures 2-10.1** and **2-10.2** illustrates the approximate location of these permissions and proposals. Other relevant planning history within the Sites is outlined in **Appendix A** of this Planning Statement. The following provides a summary of the key developments and proposals affecting the Sites.
- 2.6.4 A small area of land within Order limits at the eastern edge of Sunnica East Site B coincides with the planning permission boundary for Worlington Quarry as shown on the Restoration Overlap Plan **[EN010106/APP/2.9]**. The Quarry was originally consented under planning permission reference F/04/227 (9 August 2004), which is for the extraction of sand and gravel and the importation of material for restoration. Various amendments have been approved since that original planning permission was granted. These comprise: F/06/0300 (26 May 2006) which permitted the import of materials for use in concrete batching and amended phasing to enable this; F/09/0389 (27 August 2009) which reduced the safeguarded margin from the national gas transmission pipeline; F/09/0752/CC (10 March 2010), which amended extraction and restoration phasing to bring Phase 7 forward; and F/15/1386 (2 October 2015), which made further amendments to the phasing of the Quarry.
- 2.6.5 The area where the land within the Sunnica Order limits and the Worlington Quarry planning permission boundary coincide is within 'phase 5' of the quarry. In its Planning Statement dated June 2015 that forms part of Planning Permission F/15/1386, the quarry owner and operator, Frimstone Ltd, states that: *"Recent geological investigations in phase 5 of the operation have concluded that the majority of the phase is either barren or contains mineral not of sufficient quality or quantity to be economically viable. A small triangular area of phase 5 adjoining phase 4 is currently being worked but it is intended to move working to phase 6 in September of this year as identified on the enclosed phasing plan."*
- 2.6.6 The small triangular section that the quarry owner intended to work is located outside of the Order limits, on the opposite (eastern) corner of quarry phase 5. Therefore, although the western part of phase 5 of the quarry is within the Order limits, there appears to be little prospect of mineral being extracted from this land as the quarry owner has found it to be not of sufficient quantity and quality to be viable to work. This was also stated by Frimstone in a meeting held between the Applicant and Frimstone in July 2019. The Scheme is therefore not likely to result in the loss of any mineral that would otherwise be extracted from the quarry. It would also not affect the restoration of areas of the quarry that are to be worked for mineral.

- 2.6.7 However, as the overlap area is still subject to the restoration conditions on the Worlington Quarry planning permission, there is a need to disapply those conditions in respect of the overlap area only. This is achieved through the draft DCO.
- 2.6.8 An Anaerobic Digestion (AD) plant is located at Bay Farm which is south and east of Sunnica East Site B. The AD plant was granted planning permission by West Suffolk Council in March 2016 (application reference: DC/15/2109). The development includes the installation of an AD plant with a gas pipeline as well as associated infrastructure which generates renewable energy in the form of biogas. Condition 2 of the planning permission requires the sugar beet and maize feedstock for the AD plant to be sourced from the surrounding area which is defined on the feedstock plan approved as part of the planning permission. The area for sourcing sugar beet and maize feedstock includes all the land within Sunnica East Site B, Sunnica West Site A and Sunnica West Site B.
- 2.6.9 In June 2019 Upton Suffolk Farms applied (application reference NMA(A)/15/2109) to amend the traffic management plan (TMP) approved under the original planning permission DC/15/2109. The amendment was to allow the sourcing of feedstock to come from elsewhere which was restricted by condition 3 and condition 4 of the original planning permission. As part of this application it was explained that due to changes in the market, the AD plant is to use other types of feedstock to sugar beet and maize sourced from outside the feedstock plan area. West Suffolk Council approved on 11 July 2019 the amendment to the TMP which allows deliveries of other biomass products to be made via the A11.
- 2.6.10 With regard to Grid Connection Route A, Grid Connection Route B and the Burwell National Grid Substation, Table 2-1 below identifies approved and emerging development proposals that intersect and/or overlap with applicable land. **Figures 2-10.1 and 2-10.2** illustrates the approximate location of these permissions and proposals. Other relevant planning history is summarised in **Appendix A**.
- 2.6.11 Paragraph 6.13 of this Planning Statement also assesses the compliance of the Scheme with other impacts on existing land uses, development plan allocations and safeguarded areas in terms of planning policy.

Table 2-1 Key approved and emerging development proposals along Grid Connection Routes A and B and the land at Burwell National Grid Substation

Map ref	Application ref and development description	Relevance to the Scheme
Figure 2-10.2 (#12)	WSC DC/20/1500/EIASCO EIA scoping opinion issued October 2020 Proposed Anglian Water pipeline running between Bexwell and Bury St Edmunds	The proposed pipeline crosses Grid Connection Route A between Sunnica East Site B and Sunnica West Site A at Badlingham Farm. Its route also passes to the west of Sunnica East Site A. A full planning application is required but has not yet been submitted for the development. This has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme.

Map ref	Application ref and development description	Relevance to the Scheme
		The Applicant has also been in discussions with Anglian Water and the draft DCO includes Protective Provisions for their benefit. It is also possible that routing amendments may be made by Anglian Water prior to submission of its planning application. It is possible that routing changes could remove the route or the pipeline from Order Limits.
Figure 2-10.1 (#1)	ECDC 17/01838/ESF Planning permission granted in 2019 Hybrid application made by Hermes Property Unit Trust (HPUT) for demolition, alteration and extension of a business park to provide a range of business floorspace including Use Classes B1/B2/B8, A1/A3 and/or D2 associated with the bioanalytical centre operated by LGC Limited. A Hybrid application is where detailed planning permission is sought for some elements, but only outline planning permission, with some or all matters reserved, is sought for other elements of the proposed development. No reserved matters planning applications have been submitted. Reserved matters are those aspects of a proposed development which an applicant can choose not to submit details of with an outline planning application	Grid Connection Route B crosses within the boundary for this planning permission in the north where car parking is proposed – there would be no interaction with buildings. Land is also included within the Order limits that is within the LGC site for access purposes only (no development) to Grid Connection Route B. This land is also an employment allocation policy reference FRD6 in the East Cambridgeshire Local Plan 2015 for employment development (B1/B2 uses). This extant planning permission has been considered as part of the siting process for Grid Connection Route B and the cumulative assessment in the Environmental Impact Assessment for the Scheme.
Figure 2-10.1 (#4)	ECDC 18/00579/ESF Planning permission granted January 2020 Extension of a cold storage facility with a small extension to an administrative office and vehicle parking, Fordham	Grid Connection Route B crosses within the planning permission boundary to the south of the Fordham Bypass A142 where a surface water attenuation feature is proposed. This land is also an employment allocation policy reference FRD7 in the East Cambridgeshire Local Plan 2015 for employment development (B1/B2/B8 uses). This planning permission has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme and will be taken into account in the detailed design of the Scheme.
Figure 2-10.1 (#8 & #11)	ECDC 21/00706/ESF WSC DC/21/0968/FUL Application submitted not yet determined	Grid Connection Route B intersects with this proposed development. The application is yet to be determined at the time of writing. Sunnica Limited has held discussions with the proposed developers, AGR, and have agreed set back distances of the Burwell II proposals to

Map ref	Application ref and development description	Relevance to the Scheme
	Burwell II solar farm – a proposed solar farm and ancillary development on land to the east of Breach Farm, Ness Road Burwell	avoid direct impacts with Grid Connection Route B.
Figure 2-10.1 (#3)	ECDC 18/00383/VARM Planning permission originally granted in November 2015. Operational life extended in July 2018 from 30 years and 6 months to 40 years and 6 months from the date of the first export of electricity. Time limited solar farm at Goosehall Farm	The outer edge of the Grid Connection Route B corridor is located within the southern extent of the planning application boundary. The overlap between the two schemes is very small and it is not anticipated that they would interact with one another.
Figure 2-10.1 (#5)	ECDC 19/00155/FUL Planning permission granted April 2019 Site South East of Burwell Main Sub-Station Weirs Drove Burwell	The construction and operation of a 49.9MW battery storage facility, fencing, landscape planting and site access on land adjacent to the operational Burwell 400kV substation. This is within the Order limits, southeast of the existing Burwell National Grid Substation, south of the Scheme's proposed substation extension area, west of Weirs Drove. Although the site is within the Scheme's Order limits, no development is proposed as part of the Scheme on the planning application site. This planning permission has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme.
Figure 2-10.1 (#10)	ECDC 21/00854/SCREEN Land North of New England Farm Heath Road Swaffham Bulbeck Cambridgeshire	A screening opinion request was submitted in May 2021 for a proposed Solar PV development and associated cable connection to Burwell National Grid Substation. Although this is on land south of Burwell National Grid Substation the cable connection into the substation is within the Order limits.

Planning history surrounding the Order limits

- 2.6.12 Within close proximity of the Order limits there are a number of planning permissions and emerging proposals for energy developments. Of relevance, given their proximity and proposed use are the approved and emerging development proposals (illustrated on **Figures 2-10.1** and **2-10.2**) listed in **Table 2-2**. Other relevant planning history is set out in **Appendix A**.

Table 2-2 Key approved and emerging development proposals surrounding the Order limits

Map ref	Application ref and development description	Relevance to the Scheme
Figure 2-10.1 (#7)	20/01654/FUL Planning permission granted March 2021 A battery storage installation and associated infrastructure at Goosehall Farm	The development authorised by this planning permission will be located within the newly constructed solar farm at Goosehall Farm. The cable route for the development is approximately 100m west of the Order limits and so does not directly interact with the Scheme. This has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme.
Figure 2-10.1 (#6)	20/00557/ESF Planning permission granted August 2020 A solar farm and ancillary development, west of Burwell National Grid Substation.	The development authorised by this planning permission is located immediately west of the Order limits at Burwell National Grid Substation and there is no direct conflict or interaction with the Scheme. This has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme.
Figure 2-10.1 (#2)	17/02205/FUL Planning permission granted April 2018 49.9MW battery storage facility, bridge and associated infrastructure. 21/00816/FUL - Construction of a 30MW battery energy storage system facility and associated access, landscaping and other infrastructure works. Application submitted in May 2021	This facility is west of Weirs Drove adjacent to the Order limits and is understood to currently be under construction. An application for Phase 2 of the battery storage facility immediately east of the facility under construction was submitted in May 2021. There is no direct conflict or interaction with the Scheme. This has been considered as part of the cumulative assessment in the Environmental Impact Assessment for the Scheme.

2.6.13 The Applicant is also aware of the proposals for the Cambridgeshire Autonomous Metro (CAM) to provide a regional route alignment to Mildenhall. The Mayor of Cambridgeshire and Peterborough (at the time of the statutory consultation) responded to the statutory consultation requesting that the Scheme avoid any conflict with the potential route and operation of the CAM. The Applicant has discussed the proposals with the CAM project team. CAM has not yet selected a preferred option for the Mildenhall route and it was agreed that given the early stage of the CAM project, the Scheme would be unable to consider the CAM's preferred route and instead the CAM project would need to consider the proposed location of the Scheme in its route options. The Applicant is, however, committed to engaging with the CAM project and hold further discussions in the future about

how the two schemes can work together. The Applicant also notes that CAM is currently undergoing a full project review and the new Mayor of Cambridgeshire and Peterborough, elected following the mayoral election held on 6 May 2021, did not support the CAM project in his manifesto.

Local Development Plan Allocations and Safeguarded Areas

- 2.6.14 **Table 2-3** lists the adopted local development plan allocations and safeguarded areas within and close to the Order limits. With the exception of the mineral safeguarding and consultation areas these are illustrated on **Figure 2-11**. The locations of mineral safeguarding and consultation areas that interact with the Scheme are described in **Table 2-3**.

Table 2-3 Adopted local development plan allocations and safeguarded areas within and close to the Order limits

Local planning policy document	Allocation/ safeguarding	Location with reference to the Order limits	Plan/policy reference
Suffolk Minerals and Waste Local Plan adopted July 2020	Minerals safeguarding – Mineral consultation area for sand and gravel	Sunnica East Site A, Sunnica East Site A and Grid Connection Route A are partially within this consultation area.	MP10
	Worlington Quarry	A small area of the Order limits at Sunnica East Site B is within working area (phase) 5 of the existing quarry – adjacent to the east are allocations for expansion of the existing quarry. See further above.	MS10
	Worlington Quarry: concrete batching plant	The south western area of Sunnica East Site B is within the 250m safeguarding zone for this existing plant	CB13
	Worlington Quarry: secondary aggregate/recycling facility	The south western area of Sunnica East Site B is within the 250m safeguarding zone for this existing facility.	SAR11
	Worlington Quarry: inert landfill	The south western area of Sunnica East Site B is within the 250m safeguarding zone for this existing landfill	IL4
	Barton Mills Chalk Quarry - Secondary aggregate/recycling facility	The eastern area of Sunnica East Site B is within the 250m safeguarding zone for this existing facility.	SAR25
	Barton Mills Chalk Quarry – inert landfill	The eastern area of Sunnica East Site B is within the 250m safeguarding zone for this existing landfill which is east of the Order limits, east of the A11 and north of Red Lodge	IL11
Suffolk Minerals and Waste Local Plan adopted July 2020	Bridge End Dismantlers metal recycling facility	The south eastern area of Sunnica East Site B is within the 250m safeguarding zone for this existing metal recycling facility which is adjacent to the Order limits,	MELV1
Cambridgeshire and Peterborough	Mineral safeguarding area for chalk	The western areas of Sunnica East Site A, where they are located within the CCC administrative boundary, are within this mineral safeguarding area	Policy 5

Local planning policy document	Allocation/ safeguarding	Location with reference to the Order limits	Plan/policy reference
Minerals and Waste Development Local Plan adopted July 2021		The majority of Sunnica West Site A and the whole of Sunnica West Site B are within this mineral safeguarding area. The area of Grid Connection Route A which is located within the CCC administrative boundary is within this safeguarded area. Grid Connection Route B and the Burwell National Grid Substation extension areas are entirely within this safeguarded area	
	Mineral Safeguarding Area for sand and gravel	The majority of Sunnica West Site A is within this mineral safeguarding area. The western area of Sunnica West Site B is within this mineral safeguarding area. Grid Connection Route A is partially within this safeguarded area up to the Cambridgeshire County boundary	Policy 5
	Consultation Areas around the Waste Management Areas (WMAs) at Kennett Landfill	A small section of the northern edge of Sunnica West Site A is within the consultation area.	Policy 16
	Consultation Area which is a buffer around the Waste Management Area (WMAs) at Kennett Plantation Farm.	A small area of Grid Connection Route A is partially within the Consultation Area	Policy 16
	Consultation Area which is a buffer around the Transport Infrastructure Area (TIA) at the Land off Snailwell Road	A small section towards the south west of Sunnica West Site B crosses the consultation area.	Policy 16
	Consultation Area which is buffer around the Water Recycling Areas (WRA) at Burwell Water Recycling Centre.	Grid Connection Route B crosses this consultation area.	Policy 16

Local planning policy document	Allocation/ safeguarding	Location with reference to the Order limits	Plan/policy reference
Forest Heath Site Allocations Local Plan (adopted September 2019)	Land off Turnpike Road and Coopers Yard allocated for 132 dwellings	Approximately 300m east of Sunnica East Site B	SA9(a)
	Land west of Newmarket Road and north of Elms Road allocated for 125 dwellings	Approximately 600m east of Sunnica East Site B. Planning permission is understood to be granted and has commenced.	SA9(d)
West Suffolk Local Plan (Regulation 18) Issues and Options Document (published for consultation in October 2020)	Land north of Elms Road and A11 northbound exit slip road to Red Lodge proposed allocation of 55ha of employment land	Immediately south east of Sunnica East Site B	WSE04
East Cambridgeshire Local Plan 2015	Fordham employment allocations	Grid Connection Route B crosses within the northern extent of FRD7 which is referred to as Land north of Turners allocated for B1/B2 and B8 uses and is within the northern extent of FRD6 which is known as Land at Horse Racing Forensic Laboratories allocated for B1/B2 uses. These allocations have planning permission already granted as discussed in section 2.6. There are also other employment allocations which are further south outside the Order limits.	FRD4 FRD5 FRD6 FRD7 FRD8

- 2.6.15 The section 42 consultation response from the host authorities identifies a number of aspirations for potential future infrastructure improvements that West Suffolk Council have identified to support existing communities and future growth. These are:
- a. A11 Fiveways –Longer term improvements for Fiveways Roundabout (for example at grade separation) and the at grade junctions will be considered for National Highways' RIS3 funding cycle, which is expected to cover the years 2025 to 2030.
 - b. Improved transport links to the West of Mildenhall.
 - c. Junction 38 - where the A14 meets the A11.
 - d. Ipswich to Cambridge railway line – ability to deliver increased passenger or freight services.
- 2.6.16 The Applicant has not identified any allocation or safeguarded land within an adopted Development Plan document, nor any development consent order or planning application/permission either granted in progress for any of the above schemes. As such, it is considered that these are at too early a stage to be relevant to the decision on this Application and are therefore not considered further by this Planning Statement.

2.7 Site Selection

- 2.7.1 The Applicant has followed a step by step process to confirm that the location of the Scheme is suitable for a large scale solar farm as set out in **Chapter 4 Alternatives and Design Evolution** of the Environmental Statement [EN010106/APP/6.1] and **Appendix 4A Alternative Sites Assessment** of the Environmental Statement [EN010106/APP/6.2]. The approach to considering alternatives in terms of locations and other aspects of the Scheme accords with section 4.4 of the Overarching National Policy Statement for Energy (EN-1). In addition, Regulation 14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and PINS Advice Note 7 are applicable to the information provided on alternatives within the ES and are complied with.
- 2.7.2 The key reasons for why the land within the Order limits was selected and why it is considered a suitable location for a large scale solar farm are that:
- a. the land is within East Anglia - an optimal region within the UK to locate a large scale solar farm. This is due to the region's high levels of solar irradiation compared to other parts of the UK and its topography, which is predominantly made up of and characterised by large flat open land. East Anglia is also located near high demand centres for electricity (i.e. Cambridge and London) therefore, large scale solar development in this location will allow generated power to be transferred to areas of high demand with low transmissions losses;
 - b. there is available capacity for the Scheme to connect to the national electricity transmission system (NETS) at Burwell National Grid Substation that can

make use of existing infrastructure and can be completed within a reasonable timeframe and cost;

- c. the land maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 96% of the land being classified as non BMV land;
- d. the land is not located within internationally and nationally designated biodiversity sites and can avoid direct impact on locally designated biodiversity sites;
- e. the land is not located within or close to Areas of Outstanding Natural Beauty or designated areas of local landscape value;
- f. the land is not located within designated green belt;
- g. the land can avoid direct physical impact on designated heritage assets;
- h. the land is predominantly within Environment Agency Flood Zone 1 and is therefore at a low risk of flooding;
- i. the land has good transport access for construction; operational maintenance; and decommissioning being adjacent to A14 and A11 part of the strategic road network;
- j. the land is of a size and has excellent topographical characteristics which meet the requirements of the Scheme to generate significant amounts of electricity; and
- k. the land has limited land use conflicts with respect to local development plan allocations and displacement of existing businesses.

3 The Scheme

3.1 Introduction

- 3.1.1 The Scheme comprises an energy farm with solar PV and Battery Energy Storage System (BESS) infrastructure. Associated electrical infrastructure for connection to the NETS, comprising of Grid Connection Route A, Grid Connection Route B and an extension to the Burwell National Grid Substation is also proposed.
- 3.1.2 The Sunnica Energy Farm is a new solar energy farm proposal that would deliver electricity to the national electricity transmission network (the Scheme). Sunnica Limited is proposing to install ground mounted solar photovoltaic (PV) panel arrays to generate electricity energy from the sun and combine these with a Battery Energy Storage System (BESS) which will connect to the Burwell National Grid Substation in Cambridgeshire.
- 3.1.3 Electricity will be generated at Sunnica East Site A, near Isleham in Cambridgeshire; Sunnica East Site B, near Worlington and Freckenham in Suffolk; Sunnica West Site A near Chippenham and Kennett in Cambridgeshire; and Sunnica West Site B, near Snailwell in Cambridgeshire (the Sites). All the Sites will comprise ground mounted solar PV panel arrays, supporting electrical infrastructure and, with the exception of Sunnica West Site B, a BESS.
- 3.1.4 Supporting electrical infrastructure will include on-site substations on Sunnica East Sites A and B and Sunnica West Site A, and on-site cabling between the different electrical elements across the Scheme. The generating equipment of the Scheme will be fenced and be protected via security measures such as Closed Circuit Television and lighting. Inside the fenced areas, in addition to the generating equipment, will be internal access tracks, and drainage. It is not proposed for any area to be continuously lit.
- 3.1.5 Visual, ecological and archaeological mitigation is proposed which includes proposed grassland planting and new woodland; retention of existing woodland, wetlands and other vegetation; provision of replacement habitat and offsetting areas where there will be no development. The BESSs will consist of a compound and battery array to allow for the importation, storage and exportation of energy to the National Grid. There will also be areas at Sunnica East Site A and Sunnica East Site B for office and storage facilities for use during the Scheme's operation.
- 3.1.6 The Scheme will be connected to the existing Burwell National Grid Substation, using 132 kilovolt cables buried underground. The cables will run between Sunnica East Site A, Sunnica East Site B and Sunnica West Site A (Grid Connection Route A), and then from Sunnica West Site A to, Sunnica West Site B and onwards to the Burwell National Grid Substation (Grid Connection Route B). An extension to the Burwell National Grid Substation will be required, including a transformer compound to transform the 132kV export voltage from the Sites to the National Grid 400kV connection voltage. The substation extension compound will have a footprint of up to 43m by 76m footprint, 12m in height, with an associated laydown area of 43m by 30m.

- 3.1.7 The two areas identified for Burwell National Grid Substation Extension are currently agricultural fields. Option 1 is located within National Grid land ownership to the east of the existing substation and a planned extension by National Grid, adjacent to Weirs Drove, approximately 200m west of Burwell. The alternative location, Option 2, is to the north of the existing substation approximately 450m from Burwell. The footprint of the built-form substation extension will be the same within both locations; however, the area identified for Option 2 is larger due to the need for flexibility. Access to Option 1 will be from Weirs Drove to the south. Access to Option 2 will be from Newnham Drove to the south of Option 2 and to the north of the existing Burwell Substation. The draft DCO, Schedule 2, controls the development of just one of these options.
- 3.1.8 The Scheme will have two main access points, one north of Elms Road at Sunnica East B and one south of La Hogue Road at Sunnica West Site A. The main access route to Sunnica West Site A will be via the Chippenham junction of the A11, to the north of junction 38 of the A14. Sunnica East Site B will be accessed via the A11 and B1085. A number of secondary access points are proposed to access the individual land parcels through construction, operation and decommissioning activities. Compounds to support construction will be in place on all of the Sites.
- 3.1.9 A full description of the Scheme is contained within **Chapter 3** of the Environmental Statement [EN010106/APP/6.1] and the **Design and Access Statement** [EN010106/APP/7.3].
- 3.1.10 The following sections outline the principal components of the Scheme and the anticipated programme and key activities for its construction, operation (including maintenance) and decommissioning.
- 3.1.11 As is common when development consent is sought for an NSIP, the Applicant has not undertaken detailed design for all elements of the Scheme. It has therefore applied the Rochdale envelope approach and it has defined limits of deviation within which the subsequent development would be constructed. The detailed design of the Scheme within these limits of deviation would be carried out after development consent is granted. This has allowed the potential impacts of the Scheme to be assessed with appropriate design mitigation proposed whilst allowing flexibility for future detailed design development.
- 3.1.12 A more detailed description of the Scheme including details of maximum limits of deviation relating to size, appearance and materials of the principal components and associated development is presented in **Chapter 3: Scheme Description** of the Environmental Statement [EN010106/APP/6.1] and the **Design and Access Statement** [EN010106/APP/7.3]. Parameter plans (**Figures 3-1 and 3-2**) illustrating a potential masterplan for the Scheme at the Sites are provided in **Appendix C** of this Statement whilst the **Works Plans** [EN010106/APP/2.2] identify the maximum limits of deviation of the Scheme to be authorised by the draft DCO. The illustrative masterplan therefore “fits” within the limits of deviation shown on the Works Plans. As described in the ES, the environmental assessment has assessed the worst case being the limits of deviation secured via the Works Plans.

3.2 The Principal Components of the Scheme

3.2.1 The principal physical components of the Scheme, which form the generating station (the NSIP - Works No. 1A, 1B, 1C and 1D shown on the **Works Plans [EN010106/APP/2.2]**), are to be located at Sunnica East Site A, Sunnica East Site B, Sunnica West Site A, and Sunnica West Site B. These are set out in Table 3.1 below.

Table 3-1 Principal components of the Scheme

Scheme component for NSIP generating station (Works Nos., 1A, 1B 1C and 1D)	Summary explanation of component
Solar Modules (Work No. 1A(i), 1B(i), 1C(i), 1D(i))	Solar photovoltaic panels designed to convert solar irradiance to electrical energy fitted to mounting structures.
Solar stations (Work No. 1A(ii), 1B(ii), 1C(ii), 1D(ii))	Solar stations comprising the items described below. i. Inverters – electrical equipment required to convert direct current (DC) power generated to alternating current (AC), which allows the electricity generated to be exported to the National Grid. ii. Transformers – means a structure containing electrical switch gear serving to transform electricity generated to a higher voltage. iii. Switchgear – a combination of electrical disconnect switches, fuses, or circuit breakers used to control, protect, and isolate electrical equipment. Each component for each solar station will either be: a. located outside, with a concrete foundation slab for each of the inverters, transformers and switchgear and a levelling layer of thick sand with a concrete perimeter pavement; or b. housed together within a container sitting on a concrete foundation slab and a levelling layer of thick sand with a concrete perimeter pavement.
Electrical cables (Work No. 1A(iii), 1B(iii), 1C(iii), 1D(iii))	Cables comprising low voltage cables, 33 kV cables, 132 kV cables, 400 kV cables, earthing cables, optical fibre cables, data cables, and auxillary cables, including works associated with cable laying.
Monitoring and control systems (Work No. 1A(iv), 1B(iv), 1C(iv), 1D(iv))	Up to 17 solar PV control room buildings or containers within the Sites, which will be up to 7.5m by 3.5m and up to 3.5m in height. These will include operational monitoring and control systems for the Sites. The control buildings will be a painted block building or glass reinforced plastic (GRP) with external colours and finishes to be confirmed prior to construction.
Weather stations and DC boxes (Work No. 1A(v), 1B(v), 1C(v), 1D(v))	Weather station up to a maximum of 6m in height with instruments to measure solar irradiance, ambient temperature, wind direction and wind speed. DC Electrical Box comprising fuses, circuit breaker, and communication equipment.

3.2.2 Associated development which is proposed to be consented as part of the DCO comprises the following infrastructure set out in Table 3.2 below with the corresponding Work No. shown on the shown on the **Works Plans [EN010106/APP/2.2]**).

Table 3-2 Associated development

Associated development	Summary explanation
BESS (Work Nos. 2A, 2B and 2C)	The BESS provides peak generation and grid balancing services to the electricity grid by allowing excess electricity generated either from the solar PV modules, or imported from the electricity grid, to be stored in batteries and dispatched when required. There will be three BESS compounds: one at Sunnica East Site A; one at Sunnica East Site B; and one at Sunnica West Site A. Each will comprise the elements listed below. • Battery energy storage cells. • A structure protecting the battery energy storage cells and ancillary equipment, being either one container or multiple containers joined to each other, mounted on a reinforced concrete foundation slab or concrete piling. • Heating, ventilation and air conditioning (HVAC) or liquid cooling systems either housed within the containers referenced above, attached to the side or top of each of the containers, or located separate from but near to each of the containers. • Battery stations, which are stations comprising transformers, switchgear, power conversion system (PCS) or inverter, and other ancillary equipment with each component for each battery station either— ○ located outside, with a concrete foundation slab or concrete piling for each of the inverters and transformers and a levelling layer of thick sand with a concrete perimeter pavement for the switchgear; or ○ housed together within a container sitting on a concrete foundation slab or concrete piling. • The batteries will be provided in containers. They will be supported by Battery Stations which will comprise transformer, switchgear, power conversion system (PCS) or inverter, and other ancillary equipment located within compounds. The equipment will either be located outside with a concrete foundation slab for each of the inverters and transformers or housed together within a container. • Monitoring and control systems housed within a container with the HVAC or liquid cooling systems or located separately in its own container or control room. • Electrical cables. • Fire safety infrastructure comprising fire suppression system. • Water storage structure for the purposes of firefighting comprising fire water tanks and fire water containment.

Associated development	Summary explanation
Onsite substations (Work Nos. 3A, 3B, 3C)	Three onsite substations consisting of electrical infrastructure. They will be located within Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A. Work No. 3A - works on the East A Site comprising: (i) substation; (ii) control building or container; (iii) welfare facilities; (iv) hardstanding areas; and (v) electrical cables including electrical cables connecting to Work Nos. 1A, 2A and 4; Work No. 3B - works on the East B Site comprising: (i) substation; (ii) control building or container; (iii) welfare facilities; (iv) hardstanding areas; and (v) electrical cables including electrical cables connecting to Work Nos. 1B, 2B and 4; and Work No. 3C - works on the West A Site comprising: (i) substation; (ii) control building or container; (iii) welfare facilities; (iv) hardstanding areas; and (v) electrical cables including electrical cables connecting to Work Nos. 1C, 1D, 2C and 4.
Electrical cabling (Work No.4)	Works to lay electrical cables including: (a) electrical cables connecting Sunnica East Site A (Work No. 3A) to Sunnica East Site B (Work No. 3B); (b) electrical cables connecting Sunnica East Site B (Work No. 3B) to Burwell National Grid Substation Extension (Work No. 5); (c) electrical cables connecting Sunnica West Site A (Work No. 3C) to Burwell National Grid Substation Extension (Work No. 5); and (d) electrical cables connecting Sunnica West Site B (Work No. 1D) to Sunnica West Site A (Work No. 3C)
Extension to Burwell National Grid Substation Extension (Work No. 5)	The Scheme requires an extension to the substation and therefore two potential areas are proposed. Burwell Substation Extension Option 1 land is located approximately 60m east and south east of the existing substation, adjacent to Weirs Drove (Work No. 5A). Burwell National Grid Substation Extension Option 2 land is located to the north of Newnham Drove and the existing substation (Work No. 5B). Only one option would be constructed, which is controlled by a Requirement in Schedule 2 to the draft DCO. Both options involve:

Associated development	Summary explanation
	• temporary construction laydown; • transformer compound; • substation; • control building; • underground and above ground electrical cables including electrical cables connecting to the existing substation; • electrical bays to connect into existing network within the existing substation including disconnectors and ancillary equipment; • permanent means of access; • permanent compound area; • security and site lighting infrastructure, including cameras, perimeter fencing; and • flood protection measures. In addition, works are required to enable the extension to connect into the existing substation together with landscaping and mitigation measures (Work No. 5C), which involve: • underground and above ground electrical cables including electrical cables connecting to the existing substation; • soft landscaping including planting; and • landscape and biodiversity mitigation measures.
Green Infrastructure and stone curlew reserve (Works Nos. 6A, 6B, 6C and 6D, Work 10)	Landscaping and visual screening and habitat creation – (Work Nos. 6A, 6B, 6C and 6D) • soft landscaping including planting; • landscape and biodiversity enhancement measures (including native grassland planting, native wetland planting, woodland planting and infilling of existing vegetation and new hedgerow planting and infilling of existing hedgerows); • earth works; • permissive paths (Sunnica East Site A and Sunnica East Site B only); • hard standing and hard landscaping; • drainage and irrigation infrastructure and improvements or extensions to existing irrigation systems; • fencing, gates, boundary treatment and other means of enclosure; and • improvement, maintenance and use of existing private tracks. An Outline Landscape and Ecological Management Plan (OLEMP) has been prepared (Appendix 10I of the Environmental Statement [EN010106/APP/6.2]). This document sets out the principles for how the land will be managed throughout the operational phase, following the completion of construction. A detailed Landscape and Ecology Management Plan (LEMP) will be produced following the granting of the DCO and prior to the start of construction.

Associated development	Summary explanation
	Specific habitat creation is proposed for Stone curlew birds (Work No. 10). This is explained in the OLEMP and also the Offsetting habitat provision for stone curlew specification [EN010106/APP/6.6] .
Temporary construction laydown areas (Work No 7)	Temporary construction laydown areas are required at Sunnica East Site A (Work No. 7A), Sunnica East Site B (Work No. 7B), Sunnica West Site A (Work No. 7C) and Sunnica West B (Work No. 7D), comprising: • areas of hardstanding; • car parking; • site and welfare offices and workshops (Sunnica East Site A and Sunnia East Site B only); • security infrastructure, including cameras, perimeter fencing and lighting; • site drainage and waste management infrastructure (including sewerage); and • electricity, water, waste water and telecommunications connections. Temporary construction laydown areas are required for the installation of the electrical cable (Work No. 7E) comprising: • areas of hardstanding; • car parking; • security infrastructure, including cameras, perimeter fencing and lighting; • site drainage and waste management infrastructure (including sewerage); and • electricity, water, waste water and telecommunications connections.
Warehouse buildings and permanent compounds (Work No. 8A and 8B)	Two warehouse buildings will be provided for use during operation and will be located at Sunnica East Site A (Work No. 8A) and Sunnica East Site B (Work No. 8B). These areas comprise: • a warehouse building for the storage for spare parts and office and welfare facilities; • a canteen either located within the warehouse building or in a separate container or building; • waste skips; • parking areas; and • a permanent compound area.
Works to streets (Work No. 9)	Various works to highways are required to facilitate access to the Scheme.
Security – fencing, lighting and closed circuit television (CCTV)	Operational areas of the Sites will be fenced. Fencing will also be provided around the transformers if they are outside.

Associated development	Summary explanation
	CCTV - Pole mounted internal facing CCTV systems are proposed around the perimeter of the operational areas of the Sites. CCTV cameras will have fixed view sheds and will be aligned to face along the fence. Lighting – during operation this is only proposed within the substations and BESS compounds, and will be motion sensed. Any night works required on the solar panels during operation will use mobile lighting towers.
Drainage infrastructure	A Sustainable Urban Drainage System compliant drainage design is proposed consisting of a series of interconnected swales and infiltration ponds to manage surface water from within the Sites.
Internal access roads, access points and car parking	A network of internal roads with access points to provide access for construction, to equipment during operation and for decommissioning. These will consist of compacted stone tracks up to 3.5m wide with 1:2 gradient slopes on either side. Primary access points are to be provided at Sunnica East Site B and Sunnica West Site A. These accesses will be wider to facilitate two-way HGV traffic and will be where small vehicles can access car parks.

BESS (Work Nos. 2A, 2B and 2C) - Associated Development

- 3.2.3 Section 115 of the PA 2008 provides that development consent may be granted for development for which development consent is required or associated development. In the case of the Scheme the development which constitutes development for which development consent is required is described as Work No.1 in Schedule 1 of the draft DCO and constitutes the NSIP for which development consent is required. This relates to the solar modules, solar stations, electrical cables, the monitoring and control systems and weather stations and direct current (DC) boxes. It is clear following the change in the law² that BESS will not now normally be an NSIP in its own right, but it is capable of being associated development within the meaning provided in section 115 of the PA 2008.
- 3.2.4 Of relevance to the Scheme, Section 115 provides that for development to be considered associated development it must be associated with the NSIP which is being granted development consent and be located within England.
- 3.2.5 The provisions of the PA 2008 do not provide a detailed framework for what type of development is capable of being associated development. However, guidance has been published to assist with this entitled 'Guidance on associated development applications for major infrastructure projects' (Department for Communities and Local Government April 2013) ('Associated Development Guidance'). It provides the following principles:

² Infrastructure Planning (Energy Storage Facilities) Order 2020 and Electricity Storage Facilities (Exemption) (England and Wales) Order 2020

- a. There must be a direct relationship between the associated and principal development. Therefore the associated development must support the construction or operation of the principal development;
- b. Associated development must not be an aim in itself but subordinate to the principal development;
- c. The associated development will not be considered as such if it is only necessary as an additional revenue for the applicant. Cross subsidy is possible, but if the associated development is only necessary for this purpose then it would not be considered associated development;
- d. Associated development should be proportionate to the nature and scale of the principal development; and
- e. Associated development will generally be typical of development brought forward along the relevant type of principal development or of a kind which is usually necessary to support a particular type of project.

3.2.6 It is noted that Annex A & B of the Associated Development Guidance (which was written and published prior to the change in legislation that removed BESS from being an NSIP in its own right) does not include reference to BESS. The Applicant does not consider much weight should be attributed to this. It is clear from paragraph 12 of the guidance that the lists provided in the annex are illustrative only (not exhaustive or fully inclusive) and at the time the guidance was published in 2013 large scale BESS was not commercially feasible and so would not have been considered by the authors of this guidance even below the generating threshold that then applied to BESS.

3.2.7 The Applicant considers that the BESS is demonstrably consistent with the principles set out in the Associated Development Guidance for the reasons set out below. Table 10-1 of the **Statement of Need [EN010106/APP/7.1]** sets out the need for the BESS.

3.2.8 The Applicant considers that Work Nos. 2A, 2B and 2C for the BESS, as explained in the **Explanatory Memorandum [EN010106/APP/3.2]**, has a direct relationship with Work No.1, the principal development (i.e. the solar PV modules, solar stations, and onsite cabling etc). The BESS will support the operation of Work No. 1 by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of Work No. 1; aiding both its operation as a generating station and the export of electricity to the national grid. Importantly, the BESS would not be constructed without Work No. 1, and as such is evidently subordinate to it.

3.2.9 Whilst the BESS may be utilised to provide the Scheme an ability to cross-subsidise through, for example, the release of electricity at commercially advantageous times, this is not the sole purpose of the BESS, as it will also increase the efficiency in the operation of the Scheme. The BESS is, therefore, not necessary for the solitary purpose of cross-subsidising the Scheme.

- 3.2.10 In light of the export capacity secured by the Applicant, under Work No. 1 and Work No. 2, the BESS' inclusion in the DCO as associated development is proportionate to the nature and scale of the principal development. Finally, the Applicant considers that the BESS is the type of associated development that is typical of being brought forward alongside the principal development

3.3 Operation

- 3.3.1 The generation of electricity from the Scheme is expected to commence at the earliest in 2025 and will operate for no more than 40 years.
- 3.3.2 Operational activities will include vegetation management; equipment maintenance and servicing; replacement of any components that fail; and monitoring. It is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment to ensure the continued effective operation of the Scheme and improve its efficiency.
- 3.3.3 Along the cable route, operational activity will consist of routine inspections and any reactive maintenance such as where a cable has been damaged.
- 3.3.4 It is anticipated that there will be up to 17 permanent staff on the Sites during the operational phase during a single shift, with staff working on a three shift pattern. There will also be a requirement for additional staff to attend the Sites when required for maintenance and cleaning activities. Access points during the operation of the Scheme are shown on **Figures 3-3** and **3-4**.
- 3.3.5 An Operational Environmental Management Plan (OEMP) will be implemented to manage any environmental impacts of operational and maintenance activities. This is to be secured by a requirement of the DCO. A Framework OEMP is provided at **Appendix 16F** of the Environmental Statement **[EN010106/APP/6.2]**.

3.4 Construction

- 3.4.1 Activities undertaken during the construction stage of the Scheme will include:
- a. Site preparation and civil engineering works;
 - b. Solar PV array module construction;
 - c. Construction of onsite electrical infrastructure;
 - d. Construction of cable routes;
 - e. Construction of joint bays;
 - f. Trenchless cabling;
 - g. Testing and commissioning; and
 - h. Landscaping and habitat creation.

- 3.4.2 Full details of the construction activities likely to be required for each of the above processes are provided in Section 3.6 of **Chapter 3: Scheme Description** of the Environmental Statement [EN010106/APP/6.1].
- 3.4.3 At the peak of construction, which is expected to be in month 9, an average of 1,393 staff per day will be required to work across the Scheme. This number will be less at other times of the construction phase and if the construction period is extended more than the assumed 24 months. Working hours will be from 7am until 7pm Monday to Saturday and working days will be one 12-hour shift. No works will be undertaken within fields adjacent to 'The Gallops' on Sunnica West Site A prior to 10am to limit disruption to their horse training activities.
- 3.4.4 Table 3-3 outlines the estimated construction traffic generated by the Scheme, and are as set out in **Table 3-3** of **Chapter 3: Scheme Description** of the Environmental Statement [EN010106/APP/6.1]. The access points for construction are shown on **Figures 3-3 and 3-4**.

Table 3-3 Total construction phase traffic estimates

Purpose	Vehicle Type	Number of movements (Two way)
Total construction HGVs	HGV	Solar PV construction: - Peak 162 movements³ per day in month 2 (86 per day at Sunnica East Sites A and B and 76 per day at Sunnica West Sites A and B). - An average of 93 movements per day (51 per day at Sunnica East Sites A and B and 42 per day at Sunnica West Sites A and B). Construction of the three onsite substations and the Burwell National Grid Substation Extension: An estimated average of 14 (62 maximum) HGV movements per day will be required to construct the three onsite substations and the Burwell National Grid Substation Extension. Cable route construction: An estimated average of 22 (90 maximum) HGV movements per day will be required.
Personnel transportation	Light vehicle	Solar PV construction: - Peak 1,874 movements per day across the Sites. - Average 1,242 movements per day across the Sites. Construction of the three substations and the Burwell National Grid Substation Extension: An estimated average of 164 (maximum 254) movements per day will be required. Cable route construction: An estimated average of 8 (maximum 10) movements per day will be required over the 25-week construction period.

³ A 'movement' describes the on- way travel of a vehicle either to or from the Order limits. Therefore, two movements would be required to travel to and from the Order limits. The table above reflects the required two-way movements.

Purpose	Vehicle Type	Number of movements (Two way)
Personnel transportation	Mini-bus	Peak 118 movements per day Average 54 movements per day

- 3.4.5 Subject to development consent being granted, the earliest construction will start is Summer 2023. Connection to the NETS has been secured by the Applicant through a grid connection agreement with National Grid. Further details about the grid connection are provided in the Grid Connection Statement **[EN010106/APP/7.5]** accompanying the Application.
- 3.4.6 A construction programme of approximately 24 months will take place if the Scheme is built in one continuous phase. However, it is possible that construction may take place in phases or over a longer period of time. A construction programme of 24 months over one continuous phase is considered to give rise to the worst case scenario for the purpose of the assessment. Constructing over a single phase, rather than multiple phases spaced over longer timescales, would result in higher peak traffic volumes and a greater number of construction activities being undertaken concurrently (generating noise, dust, etc). Therefore, whilst the Scheme could be constructed over multiple phases, a single phase of construction over 24 months has been assessed in the ES as a default, unless specifically stated in the technical assessments. The Scheme will be split geographically into construction zones and it is likely that the cable route and substations will be constructed early in the 24 month programme.
- 3.4.7 There is a possibility that the BESS will not be built out at all three Sites in the first two years. The BESS may be built firstly at Sunnica West Site A, then Sunnica East Site B and finally at Sunnica East Site A. This is due to factors such as the cost of technology and the need to stagger the significant capital investment in this infrastructure. For the reasons set out in paragraph 3.4.6 above, it has been assumed that the BESS will be built during the 24 month construction phase in the assessments in the ES.
- 3.4.8 A Construction Environmental Management Plan (CEMP) will be implemented to manage the environmental impacts of construction activities. This is to be secured by a requirement of the DCO and will be in accordance with the **Framework CEMP** which is provided at **Appendix 16C** of the Environmental Statement **[EN010106/APP/6.2]**.

3.5 Decommissioning

- 3.5.1 Following 40 years of operation, the Scheme will be decommissioned which is secured by a requirement set out in Schedule 2 of the DCO **[EN010106/APP/3.1]**. Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases. All installed infrastructure equipment will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. The 132kV cables along the Grid Connection Route A and Grid Connection Route B will remain in situ following decommissioning, as is standard practice.

- 3.5.2 A Decommissioning Environmental Management Plan (DEMP) will be implemented to manage any environmental impacts of decommissioning activities. This is to be secured by a requirement of the DCO and will be in accordance with the **Framework DEMP** which is provided at **Appendix 16E** of the Environmental Statement **[EN010106/APP/6.2]**.

4 The Need and Benefits of the Scheme

4.1 Introduction

4.1.1 The case for the need for the Scheme is centred on the significant contribution it will make to the three important national energy policy aims of:

- a. Decarbonisation - achieving Net Zero carbon emissions by 2050 and the importance of deploying zero-carbon generation assets at scale.

The Scheme will provide a large scale low carbon energy generating asset which is expected to be operational at the earliest by 2025.

- b. Security of supply - geographically and technologically diverse supplies.

The Scheme will provide security of supply due to its large scale; ability to complement other renewables; and the unique and efficient opportunity to integrate BESS.

- c. Affordability - The Scheme will provide large scale generation at low cost which will provide value for money for end-use consumers.

4.1.2 The Scheme will therefore be a critical part of the development of the UK's portfolio of renewable energy generation required to decarbonise its energy supply quickly and provide secure and affordable energy supplies.

4.1.3 The **Statement of Need [EN010106/APP/7.1]** accompanying the Application sets out a detailed compelling case for why the Scheme is urgently required and at the scale proposed.

4.1.4 This section of the Planning Statement summarises the need for the Scheme and the wider benefits it will bring.

4.2 Overview of Legislative and Policy Context

4.2.1 The UK is legally bound through the Climate Change Act (2008) (CCA2008) to reduce carbon emissions. The CCA2008 is underpinned by further legislation and policy measures which have developed in the last 13 years. This has been based on an increased need and urgency for decarbonisation in order to meet the UK's obligations under the Paris Agreement (2015). In October 2018, following the adoption by the UN Framework Convention on Climate Change of the Paris Agreement, the Intergovernmental Panel on Climate Change (IPCC) published a Special Report on the impacts of global warming of 1.5°C above pre-industrial levels. This report concluded that human-induced warming had already reached approximately 1°C above pre-industrial levels, and that without a significant and rapid decline in emissions across all sectors, global warming would not be likely to be contained, and therefore more urgent international action is required. The targets for carbon emissions reduction have therefore tightened more so in the last three years.

4.2.2 The National Policy Statements for Energy (Energy NPSs), published in 2011, were a response to the legal obligations set down by the CCA2008 and detail the

case for the need and urgency for new energy infrastructure of national significance as defined by the Overarching National Policy Statement for Energy (NPS EN-1). Given the age of the Energy NPSs, **the Statement of Need [EN010106/APP/7.1]** accompanying this Application builds upon the need case set out in the Energy NPSs published in 2011. National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) was published covering those technologies which, at the time of publication in 2011, were technically viable at generation capacities of over 50MW onshore and 100MW offshore. This included energy from biomass/and or waste and wind. Section 1.8 of the NPS EN-3 states that the NPS does not cover other types of renewable energy generation that are not at present technically viable over 50MW onshore or over 100MW offshore. In 2011, solar electricity generation over 50MW was not yet proven at scale. However, 10 years on, large scale solar generation is considered economically and technically viable as well as being economically and technically preferential to consumers. The government is currently reviewing and updating the July 2011 Energy NPSs. It is doing this in order to reflect its policies and strategic approach for the energy system that is set out in the Energy White Paper (December 2020), and to ensure that the planning policy framework enables the delivery of the infrastructure required for the country's transition to net zero carbon emissions. As part of the Energy NPS review process, the government published a suite of Draft Energy NPSs for consultation on 6 September 2021.

- 4.2.3 The government's Energy White Paper: Powering our Net Zero Future published in 2020 identifies the government's aim for a fully decarbonised, reliable and low-cost power system by 2050 and that the future energy generation mix for this system is *"likely to be composed predominantly of wind and solar"*.
- 4.2.4 In summary, the urgency of the need identified by recent legislation and policy requires actions to be taken in the near-term in order for that need to be met. Policy also supports solar as one of the future energy generation technologies to meet this need. The urgent need for the Scheme is therefore demonstrated.

4.3 Increasing Electricity Demand

- 4.3.1 Since the 1990s, electricity demand in England, Wales and Scotland has grown only slowly, and (since 2005) has fallen. The **Statement of Need [EN010106/APP/7.1]** identifies that this trend is as a result of the following:
- a. a decline in economic growth rate (particularly with the recession of 2009);
 - b. a reduction in the level of electricity intensity as the economy has shifted to less energy-intensive activities; and
 - c. the introduction of energy efficiency measures, especially more efficient lighting within the last seven years, but also technology development more generally.
- 4.3.2 Demand for electricity is expected to grow in the years ahead for the following reasons, which are also identified in the Energy NPSs:

- a. the switching of sources of final-use power for heating and transport from carbon-intensive sources to electricity, the generation of which can be decarbonised using technologies already available today, will put upward pressure on demand;
- b. the least-cost energy efficiency measures, such as introduction of low-voltage LEDs for lighting, have now been implemented across business and domestic sectors; and
- c. economic restructuring away from manufacturing to a service-based economy has largely occurred, however the growth of new high-technology and highly skilled manufacturing, both contributing to national economic growth and prosperity, is likely to place additional pressures on the electricity sector.

4.3.3 The above is consistent with the observations provided by National Grid Electricity System Operator (NGESO) in their Future Energy Scenarios 2020. The government's Energy White Paper: Powering our Net Zero Future published in 2020 also identifies that meeting a possible doubling of electricity demand by 2050 *"would require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target"*.

4.3.4 To enable decarbonisation and achieve net zero by 2050 required by legislation and policy, the **Statement of Need [EN010106/APP/7.1]** identifies that the power generation sector must therefore urgently both increase in capacity and reduce in carbon intensity on an unprecedented scale.

4.4 The need to provide security of supply

4.4.1 Government policy identifies the need to provide security of energy supplies. NPS EN-1 identifies at paragraph 3.3.2 that 'The government needs to ensure sufficient electricity generating capacity is available to meet maximum peak demand, with a safety margin or spare capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events.' Paragraph 3.3.4 adds that "a diverse mix of all types of power generation... helps to ensure security of supply". More recently the Energy White Paper: Powering our Net Zero Future published in 2020 states "a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar".

4.4.2 The **Statement of Need [EN010106/APP/7.1]** identifies there are challenges to solar generation due to seasonal variation of its power generation however its variability can be mitigated by:

- a. developing larger generation capacities (to maximise output during periods of low irradiation);
- b. connecting assets to different parts of the NETS;
- c. developing other projects with complementary profiles such as wind alongside solar; and

- d. developing integration technologies (for example, battery storage or participation in the hydrogen economy).

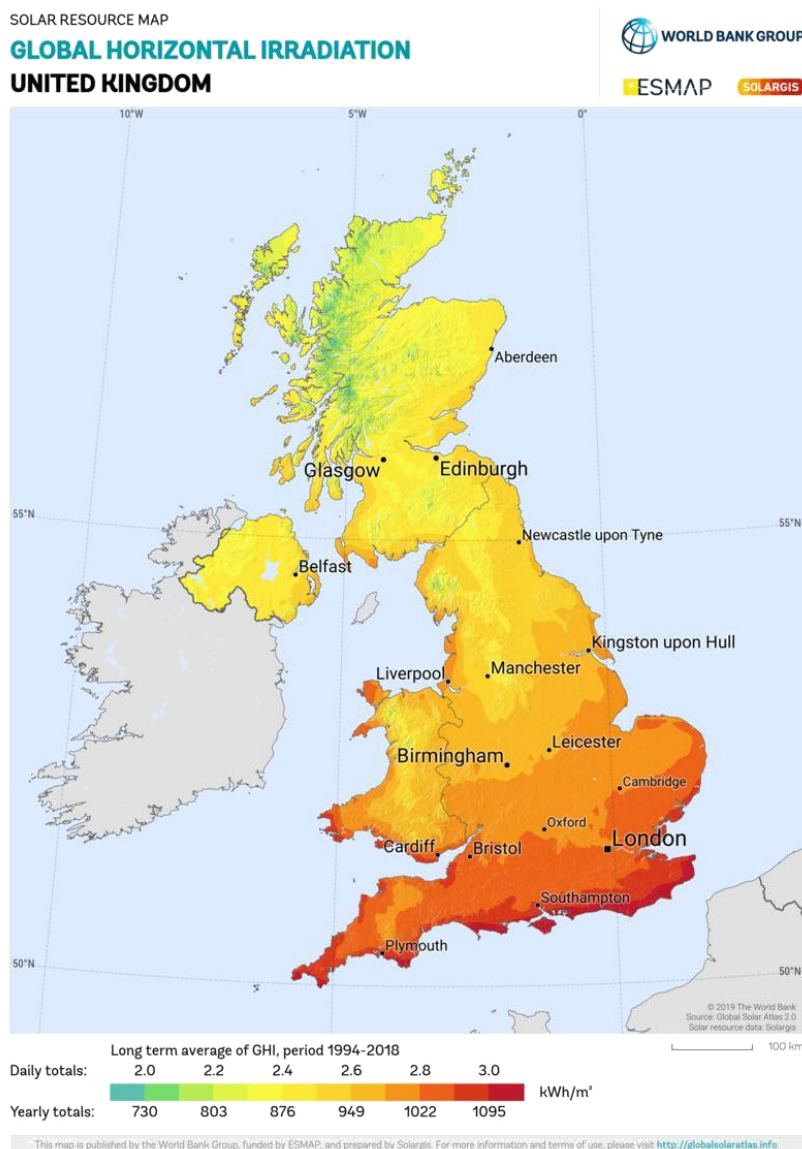


Figure 4-1: United Kingdom solar irradiation, © The World Bank
[Source: Global Solar Atlas 2.0, Solar resource data: Solargis]

- 4.4.3 A large portfolio of interconnected assets from as broad as possible a range of technologies and geography may be beneficial so that the likelihood of being able to ensure system adequacy from renewable generators in differing meteorological situations is improved. The Scheme is an important part of the growing solar generation portfolio, located in one of the higher solar irradiation areas of the UK (see **Figure 4-1** above). This increases the benefit it will bring to the UK, in relation to the bulk generation of low-carbon electricity per MW installed.
- 4.4.4 In addition, the Scheme includes the possibility of electricity storage by providing a BESS. The Applicant can therefore bring forward and install battery energy storage systems to aid the integration of high levels of renewable power

generation into the electricity market, in response to a developing need. This provides much needed flexibility to the electricity network to manage demand.

- 4.4.5 The **Statement of Need [EN010106/APP/7.1]** concludes that although individual renewable assets are variable generators, the generation dependability of a portfolio which consists of different renewable technology is more stable. In addition, the generation profiles of a diverse range of low-carbon generators would combine to meet seasonal average demand levels without requiring significant and unproductive capital investment or seasonal excess generation.
- 4.4.6 As well as supporting the seasonality of renewable energy generators, the Scheme will be connected to the NETS and will be well placed to efficiently feed into both the local distribution networks as well as the NETS. Therefore maximising the opportunities to supply low-carbon power in the most efficient way across the widest possible geography. Connecting the Scheme at Burwell National Grid Substation will enable NGESO to increase the level of dependence they can place on expected renewable generation outturn nationally and would provide a local supply of bulk low-carbon generation to consumers in the local area, especially Cambridge and its surrounding area.
- 4.4.7 The Scheme's proposed solar generation and BESS are therefore ideally suited to support NGESO's needs in maintaining a safe, secure and economic electricity system.

4.5 The Need for Large Scale Solar to Deliver Low Cost Energy

- 4.5.1 In terms of affordability, internationally and nationally, there is an ongoing trend of solar generation assets becoming bigger and cheaper, each subsequent project demonstrating that the Scheme at the size and scale proposed works in real life. This scale and size also providing decarbonisation benefits and commercial benefits to consumers in the process. Other conventional low-carbon generation (e.g. tidal, nuclear or conventional carbon with Carbon Capture Underground Storage) remain important contributors to achieving the 2050 Net Zero obligation, but their contributions in the important 2020s will be very low.
- 4.5.2 The cost of solar generation is already very competitive against the cost of other forms of conventional and low-carbon generation, both in Great Britain and more widely. The **Statement of Need [EN010106/APP/7.1]** also identifies that single large-scale solar schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and economic benefits in line with government policy.
- 4.5.3 In summary, solar generation can be provided at a large scale for a relatively low cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. This could in turn have positive effects for health and well-being by helping to secure affordable supplies of energy. The Scheme would undoubtedly deliver these benefits.

4.6 Summary of the Need Case

- 4.6.1 Significant capacities of low-carbon solar generation are urgently needed in the UK to ensure that the UK remains on track through the 2020s to meet its legally

binding carbon emissions reduction targets, while enhancing national security of supply.

- 4.6.2 Overall, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Its proposed NETS connection means that it would play its part in helping NGESO manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers, both of which are identified in government policy as being required for resilient energy supplies in the future.
- 4.6.3 The Scheme provides a unique and efficient opportunity to integrate BESS with large-scale solar generation to help manage electricity demand. BESS play essential roles alongside other integration measures in providing a stable system to all consumers, thereby reducing the need for carbon-intensive back-up generation.
- 4.6.4 The Scheme will quickly deliver significant amounts of low carbon power before many other large-scale solar projects which, although needed, are behind the Scheme in the development process. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale.
- 4.6.5 In summary, the Scheme will provide large scale contributions to the UK's decarbonisation and security of energy supply quickly, while helping lower bills for consumers throughout its operational life and there is therefore a compelling case for why it should be consented and implemented without delay.

4.7 Other Benefits of the Scheme

- 4.7.1 In addition to meeting the urgent national need for secure and affordable low carbon energy infrastructure, the Scheme provides a number of local benefits in relation to biodiversity, heritage, soils and water quality, employment and access. The delivery of these benefits is supported by planning policies, as discussed in Section 6 of this Planning Statement. With the exception of employment these benefits have been as a result of the choice of location for the Scheme and the iterative scheme design process which the Applicant has undertaken and is discussed in the **Design and Access Statement [EN010106/APP/7.3]**.
- 4.7.2 The Scheme is expected to deliver a biodiversity net gain of approximately 83% for habitat units, 16% for hedgerow units, and 1% for river units. Biodiversity net gain is an approach to development which aims to leave biodiversity in a measurably better state than before. This approach still relies on the application of the mitigation hierarchy to avoid, mitigate or compensate for biodiversity losses however, net gain is additional to these approaches, not instead of them. The net gain approach results in a net residual gain for biodiversity over the development life cycle. Habitat improvement is therefore a genuine additional benefit and goes further than measures required to implement a compensation strategy. Biodiversity net gain principles have been an integral part of the iterative design process for the Scheme. The net gain proposed will be secured through the Landscape and Ecological Management Plan (LEMP) to be approved via a DCO

requirement. An outline LEMP (OLEMP) is provided at **Appendix 10I** of the Environmental Statement [EN010106/APP/6.2].

- 4.7.3 As a result of the extensive geophysical survey work undertaken of the Order limits, ten areas of high value significant archaeological activity (totalling approximately 97 ha), which were not previously known, have been removed from the developable area of the Sites and will be preserved in situ. These have been retained within the Order limits and are proposed to be managed as native grassland and therefore taken out of agricultural use which can cause harm to these assets as a result of ploughing. The areas remaining in situ are shown on **Figures 3-1** and **3-2**.
- 4.7.4 Incorporated into the Scheme design are also three permissive routes which are illustrated on **Figure 3-1**. These permissive routes will enable increased public access across the landscape of the local area and thus respond positively to local Green Infrastructure Strategies and local planning policies relating to rights of way. The paths proposed are:
- a. A new permissive route adjacent to Beck Road at Sunnica East Site A increasing the recreational value across Sunnica East Site A and providing increased connectivity between Freckenham and the southern edge of Isleham
 - b. A new permissive route across Sunnica East Site B, to provide access from the existing unclassified road (U6006) and solar PV areas E24 and across the north of E26 to E27 to connect with Golf Links Road.
 - c. A new permissive route adjacent to Elms Road and around the perimeter of solar PV areas E19 and E22, to link with existing routes to Red Lodge.
- 4.7.5 The design and implementation of the permissive routes is proposed to be secured through requirements of the DCO.
- 4.7.6 There are also expected to be benefits for the soil quality of the land within the Sites. Much of the land within the Sites is currently in arable agricultural use which is heavily irrigated as discussed in **Appendix 12B: Soils and Agriculture Baseline Report** of the Environmental Statement [EN010106/APP/6.2]. The proposed grassland cover and the suspension of cultivation will provide a number of benefits to soil health including fertility, moisture retention and structural stability. The cessation of arable agricultural activities also has the potential to improve water quality due to the reduction in nitrate infiltrating the ground and entering watercourses.
- 4.7.7 The Scheme will create significant employment opportunities during the construction phase. It is predicted that 1,685 total net jobs per annum are expected to be provided directly and indirectly within the local economy during the two year construction period. Of these, 1,483 jobs per annum will be expected to be taken-up by residents within a 45 minute driving time of the Order limits, whilst 202 jobs will likely be taken up by workers living outside this area. The gross value added to the economy of these workers is expected to be £58million, of

which £51million will be of benefit to the local economy within the 45 minute driving time of the Order limits.

- 4.7.8 The Applicant is also committing to implementing a Skills, Supply Chain and Employment Plan for the construction of the Scheme which will include provision of employment opportunities for local people. This is proposed to be a requirement of the DCO. An Outline Skills, Supply Chain and Employment Plan accompanies the Application **[EN010106/APP/7.8]**.

5 Legislative and Policy Context

5.1 Introduction

- 5.1.1 This section of the Planning Statement outlines the decision-making framework and the planning policy context for the Scheme. The Scheme's compliance with the relevant legislation and planning policy is set out in section 6. Other legislation and policy considered by the Applicant to be relevant and important to the determination of the application are also outlined.

5.2 Legislative and Policy Context for Decision Making

- 5.2.1 At the time of writing there is currently no NPS which specifically covers solar development and therefore this Application is to be determined in accordance with Section 105 of the PA 2008.
- 5.2.2 Section 105(2) of the PA 2008 provides the basis for deciding DCO applications where there is no relevant NPS. Outlined below, this section states:
- 5.2.3 In deciding the application the Secretary of State must have regard to—
- any local impact report (within the meaning given by section 60(3)) submitted to the [Secretary of State] before the deadline specified in a notice under section 60(2),*
 - any matters prescribed in relation to development of the description to which the application relates, and*
 - any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.*
- 5.2.4 With regard to sub section (a) the Local Impact Report will be prepared by the relevant local authorities which for this Scheme is Cambridgeshire County Council (CCC); Suffolk County Council (SCC); East Cambridgeshire District Council (ECDC) and West Suffolk Council (WSC) following formal submission of the Application and cannot therefore be considered at this stage.
- 5.2.5 The prescribed matters referred to in sub section (b) are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended). Of relevance to the Scheme are:
- Regulation 3(1) – When deciding an application which affects a listed building or its setting the Secretary of State must have regard to the desirability of preserving the listed buildings or its setting or any features of special architectural or historic interest which it possesses;
 - Regulation 3(2)- When deciding an application relating to a conservation area the Secretary of State must have regard to the desirability of preserving or enhancing the character or appearance of that area;
 - Regulation 3(3) – When deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting the

Secretary of State must have regard to the desirability of preserving the schedule monument or its setting.

- d. Regulation 7 – When deciding an application, having regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992.

- 5.2.6 Consideration of the impact on the Scheme on listed buildings, conservation areas and scheduled monuments and their settings is discussed in Section 6.5 and **Appendix D** of this Planning Statement and takes account of the desirability of their preservation, as per Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010. The impact of the Scheme on biological diversity (also referred to as ‘biodiversity’) is assessed by **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1] and is discussed in Section 6.6 of this Planning Statement, taking account of Regulation 7 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended).
- 5.2.7 With regard to sub section (c) it is considered that any other matters which the Secretary of State thinks are both important and relevant to their decision, and thus relevant to the Scheme, include national and local planning policy.
- 5.2.8 National planning policy relevant the Scheme is discussed further in section 5.3 and includes the relevant energy NPSs and the National Planning Policy Framework (NPPF). The Energy NPSs were written specifically for energy NSIPs and so should be afforded significant weight as important and relevant matters to be considered in the Secretary of State’s decision.
- 5.2.9 It should be noted that the NPPF was written to guide planning applications under the Town and Country Planning Act 1990 (TCPA 1990) rather than the PA 2008. At paragraph 5 the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision making framework set out in the PA 2008 and relevant NPSs, as well as any other matters that are considered both important and relevant. However, the Energy NPSs were published in 2011 and the NPPF, having been updated in July 2021, therefore provides more up to date policy. Its policies relating to specific topics relevant to the Scheme, and where these supersede the NPS policies, are therefore considered important and relevant.
- 5.2.10 Local planning policy documents and supporting guidance are likely to be regarded as important and relevant to decision making, particularly where they have recently been updated. Those considered relevant to the Scheme are set out in section 5.4 below. The PINS Advice Note One: Local Impact Reports provides guidance to local authorities with regard to the production of Local Impact Reports, which as discussed above, is what the Secretary of State must have regard to when determining DCO applications. In section 4 ‘Content of the Local Impact Report’ of Advice Note One, it lists the topics that may be of assistance in writing the report. This includes *“Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master-plans and an appraisal of their relationship and relevance to the proposals.”*

- 5.2.11 At 4.7 the advice note also adds that *“It will also be very helpful to have the local authority’s appraisal of the proposed development’s compliance with local policy and guidance.”*
- 5.2.12 The references made in Advice Note One emphasise the view of the Planning Inspectorate (PINS) that local planning policies are important and relevant in the Secretary of State’s decision making on DCO applications.
- 5.2.13 At paragraph 4.1.5 of NPS EN-1 it is explained that matters both important and relevant to the IPC’s (now the Secretary of State) decision making *“may include Development Plan Documents or other documents in the Local Development Framework”*. Of note is reference to the fact that *‘in the event of a conflict between these or any other documents and an NPS, the NPS prevails for purposes of IPC decision making given the national significance of the infrastructure’*.
- 5.2.14 The Energy NPSs provide policy regarding decision making that is relevant to NSIPs, acknowledging the likelihood of some significant adverse impacts and nationally significant benefits of NSIPs. Whereas local planning policies have been developed and designed for consideration of non NSIP development and therefore may not be wholly relevant to the Application. The weighting given to local planning policy in the planning balance therefore takes account of the purpose of the policy and its relevance to the Scheme.
- 5.2.15 Local planning policy documents and supporting guidance relevant the Scheme are discussed in section 5.4.

5.3 National Planning Policy Context

National Policy Statements

- 5.3.1 The following Energy NPSs are considered to be matters that will be important and relevant to the Secretary of State’s decision as they are of relevance to the Scheme:
- Overarching National Policy Statement for Energy (EN-1, July 2011) (NPS EN-1)— this sets out national policy for NSIP energy infrastructure defined in the NPS. It is considered important and relevant due to the Scheme being an NSIP by virtue of it generating more than 50MW. Although solar is not specifically referenced, the policies were developed specifically for generating stations and energy infrastructure of the Scheme’s proposed scale.
 - National Policy Statement for Renewable Energy Infrastructure (EN-3, July 2011) (NPS EN-3) this identifies the national need specifically for renewable energy generation along with generic impact policies for specific renewable energy technologies. As discussed in section 4 of this Planning Statement, solar is not included within the scope of the current NPS as at that time it was not proven at scale.
 - National Policy Statement for Electricity Networks Infrastructure (EN-5, July 2011) (NPS EN-5) provides the primary basis for decisions taken with respect to electricity networks infrastructure. This is considered relevant to the Grid

Connection Route A, Grid Connection Route B and the substations proposed as part of the Scheme.

- 5.3.2 The Energy NPSs were prepared specifically to address the particular balance of impacts and benefits that are likely to emerge from energy projects that are of such a scale that their contribution to meeting the Government's energy objectives is of national significance. As such, NPS EN-1, NPS EN-3 and NPS EN-5 are expected to form the primary policy context for the Secretary of State's decision. The relevant policies set out in these documents are therefore considered in this Planning Statement as the main policies in accordance with which the appraisal of policy compliance is considered.
- 5.3.3 In May 2020 judicial review proceedings against the government's failure to review the Energy NPSs were commenced. The claimants in that case argued that the government's legal commitment to achieving Net Zero, coupled with the UK's withdrawal from the EU (affecting Carbon emission trading schemes in place in the UK) together constituted a significant change in circumstances since the Energy NPSs were adopted. The government's Energy White Paper published in December 2020 sets out that the government will complete a review of the existing July 2011 Energy NPSs with the aim of designating updated Energy NPSs by the end of 2021. Until such a review is undertaken and published, the suite of July 2011 Energy NPSs remain relevant government policy for energy NSIPs.

Draft Energy National Policy Statements

- 5.3.4 The government is currently reviewing and updating the July 2011 Energy NPSs. It is doing this in order to reflect its policies and strategic approach for the energy system that is set out in the Energy White Paper (December 2020), and to ensure that the planning policy framework enables the delivery of the infrastructure required for the country's transition to net zero carbon emissions. As part of the Energy NPS review process, the government published a suite of Draft Energy NPSs for consultation on 6 September 2021. These include Draft National Policy Statement for Renewable Energy (EN-3) (Draft NPS EN-3), which includes specific policies for solar photovoltaic generation NSIPs. The enactment of Draft NPS EN-3 will therefore bring solar NSIP developments into the coverage of the Energy NPSs. However, it is not expected that Draft NPS EN-3 will have come into force before this Application has been accepted for examination and the transitional arrangements therefore mean that the Secretary of State will still be required to decide the Application in accordance with the matters set out under S105 of the PA 2008. These include any other matters which the Secretary of State thinks are both important and relevant to their decision (Section 105(2)(c) of the PA 2008). The Draft Energy NPSs are to be considered such matters.
- 5.3.5 The Applicant considers the following Draft Energy NPSs to be important and relevant matters in the determination of the Application:
- a. Draft Overarching National Policy Statement for Energy (EN-1, September 2021) (Draft NPS EN-1),

- b. Draft National Policy Statement for Renewable Energy (EN-3, September 2021) (Draft NPS EN-3), and
- c. Draft National Policy Statement for Electricity Networks Infrastructure (EN-5, September 2021) (Draft NPS EN-5).

5.3.6 Further, the Applicant considers that the above Draft Energy NPSs should be given substantial weight, for the following three main reasons:

- a. Firstly, they set out policy for Energy NSIPs that reflects the government's current energy strategy and energy policies. They provide the planning policies that are needed in order to facilitate the delivery of the energy infrastructure that is required for the government's objectives for the energy system to be met;
- b. Secondly, Draft NPS EN-3 sets out a policy context that is directly relevant to solar NSIPs such as the Scheme. Once it comes into force this means that Draft NPS EN-3 and Draft NPS EN-1 will be the only statutory planning policy documents that are directly relevant to the Scheme (or any solar NSIP). The current NPSs do not include policies specifically relating to solar development, and the National Planning Policy Framework (NPPF) and local Development Plan Documents concern themselves with developments that are of local or regional (and not national) significance only; and
- c. Thirdly, it is expected that the Draft Energy NPSs will have been designated before the Application is decided, and potentially may have been designated during or prior to the examination of the Application. The transitional arrangements set out by paragraph 1.6.2 of Draft NPS EN-1 explain that for any application accepted for examination before designation of the Draft NPSs, the current NPSs, which were enacted in 2011, should have effect. However, paragraph 1.6.3 of Draft NPS EN-1 sets out that: *"any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application."* The Applicant expects that the specific circumstances of this Application are such that Draft NPS EN-1 and Draft NPS EN-3 and Draft NPS EN-5 will be important and relevant matters and will be given significant weight in the ExA's recommendation and the SoS's decision.

5.3.7 This Planning Statement has been prepared on the basis that the Draft Energy NPSs are important and relevant matters that should be given substantial weight in the Secretary of State's decision.

National Planning Policy Framework

5.3.8 The National Planning Policy Framework (NPPF) was first published in 2012 and most recently updated in July 2021. This sets out the government's planning policies for England and is a material consideration in planning decisions made under the TCPA 1990. At paragraph 8 it sets the expectation that the planning

system should achieve sustainable development by pursuing economic, social and environmental overarching objectives in the development of plans and in decision making.

- 5.3.9 Policies of the NPPF which are considered relevant to the Scheme are presented in **Appendix B** of this Planning Statement and referred to in section 6.
- 5.3.10 The NPPF is also supported by the online resource tool, the National Planning Practice Guidance (NPPG) which provides guidance on the implementation of NPPF policies. This is particularly relevant to the implementation of heritage and flood risk policies as the NPPG provides more detailed methodologies and guidance as to how these policies should be considered and are of relevance and has been considered in the preparation of the environmental impact assessment and other supporting assessments where relevant.

5.4 Local Planning Policy Context

- 5.4.1 Local plan policies are considered 'important' and 'relevant' matters and can influence the content of Local Impact Reports which the Secretary of State must have regard to in its decision making in accordance with Section 105(2) of the PA 2008.
- 5.4.2 It should however be noted that local development plans are prepared under the Planning and Compulsory Act 2004 (as amended) for the purposes of guiding development at the local and regional scale. Under the TCPA 1990, unless material considerations indicate otherwise, planning applications are required to be determined in accordance with the local Development Plan, which comprises the policies and saved policies of all development plan documents including neighbourhood plans at the time of the decision. Policies within local development plans are therefore designed to be applicable to the management of development projects that are of local or regional significance only. Therefore, local development plan policies are not directly applicable to NSIPs.
- 5.4.3 The Scheme lies within the administrative areas of two county councils; Suffolk County Council (SCC) and Cambridgeshire County Council (CCC), and two district councils; West Suffolk Council (WSC) and East Cambridgeshire District Council (ECDC).
- 5.4.4 The local planning policy relevant to the Scheme therefore consists of the following documents:

West Suffolk Council

- a. Forest Heath District Council Core Strategy (FHCS) (Adopted 2010);
- b. Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (JDMPD) (last updated February 2015);
- c. Forest Heath Area of West Suffolk Council Site Allocations Local Plan (SALP) (Adopted September 2019);
- d. Forest Heath Local Plan Policies Map (Adopted February 2015); and

- e. Newmarket Neighbourhood Plan (made February 2020).

Suffolk County Council

- a. Suffolk Minerals and Waste Local Plan (adopted July 2020) (SMWLP).

East Cambridgeshire District Council

- a. East Cambridgeshire District Council Local Plan (ECLP) Adopted April 2015;
- b. Fordham Neighbourhood Plan (made December 2018);

Cambridgeshire County Council

- a. Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021) (CPMWLP).

Supporting this policy is guidance in the form of the following supplementary planning documents:

- b. East Cambridgeshire District Council Supplementary Planning Document (SPD) Renewable Energy Development (Commercial Scale) (adopted October 2014);
- c. East Cambridgeshire District Council Contaminated Land SPD (adopted 2015);
- d. East Cambridgeshire District Council Wildlife Sites SPD (adopted 2010);
- e. East Cambridgeshire District Council Natural Environment SPD (adopted 2020);
- f. East Cambridgeshire District Council Climate Change SPD (adopted 2020) and.
- g. Cambridgeshire Flood and Water SPD (2016).

Local planning policy status

- 5.4.5 WSC is currently preparing a new Local Plan which is at a very early stage. It is expected to be adopted mid-2024. The West Suffolk Local Plan (Regulation 18) Issues and Options Document was published in October 2020 and consulted on between October 2020 and December 2020. Following this, a Preferred Options document will be consulted on before a pre-submission Local Plan and examination in public, before adoption, programmed to be in July 2024. Until then, the adopted Local Plans covering the former St Edmundsbury and Forest Heath areas will continue to apply to those parts of the WSC area. The adopted Local Plan for West Suffolk includes documents previously referred to as the Local Development Framework for Forest Heath District Council (FHDC) and St Edmundsbury Borough Council (SEBC), listed above.

- 5.4.6 ECDC is also currently preparing a review of its Local Plan following the withdrawal of its emerging plan in February 2019. In October 2019, ECDC undertook its first 'review' of its Local Plan 2015, and determined at that stage that, following that review, a new Local Plan would not be drafted. However, ECDC also committed to monitoring the situation. Accordingly, and with the Plan hitting its fifth Anniversary on 21 April 2020, a further review has been undertaken, as set out in the East Cambridgeshire Local Plan Second Review, with the main changes being the need to update the Local Housing Needs and the housing requirement figures. However, the matter is not considered relevant to the Scheme.
- 5.4.7 SCC and CCC have up-to-date Minerals and Waste Local Plans, having been adopted in July 2020 and July 2021, respectively.
- 5.4.8 Within the ECDC, there are eight neighbourhood areas including: Sutton, Bottisham, Witchford, Fordham, Cheveley, Swaffham, Reach and Isleham. Three Neighbourhood Plans have been adopted: Fordham Neighbourhood Plan; Witchford NP and Sutton Neighbourhood Plan in May 2019. Given the Scheme's cable route passes through the Fordham Neighbourhood Plan Area the plan's policies have been considered where relevant.
- 5.4.9 Within the WSC area there are seven neighbourhood plan designated areas including: Barningham, Exning, Freckenham, Great Barton, Hargrave, Ixworth and Ixworth Thorpe and Newmarket. Currently, the Hargrave Neighbourhood Plan and Newmarket Neighbourhood Plan have been adopted. Given the Scheme's proximity to Newmarket and the Newmarket Neighbourhood Plan Area, the plan's policies have been considered, where relevant.

5.5 Other relevant legislation and policy considered to be important and relevant

The Environment Bill

- 5.5.1 The Environment Bill was first introduced to Parliament in October 2019 and at the time of writing is undergoing further parliamentary scrutiny. The Bill is a key mechanism in driving forward the UK's ambition on biodiversity and delivering its commitments under the Convention on Biological Diversity. The government identifies the main purposes of the Bill are to:
- a. Transform environmental governance once the UK leaves the European Union by putting environmental principles into law; introducing legally binding targets; and establishing a new Office for Environmental Protection.
 - b. Increase local powers to tackle sources of air pollution.
 - c. Protect nature and improve biodiversity by working with developers.
 - d. Extend producer responsibility, ensure a consistent approach to recycling, introduce deposit return schemes, and introduce charges for specified single use plastic items.

- e. Secure long-term, resilient water and wastewater services, including through powers to direct water companies to work together to meet current and future demand.

5.5.2 The government commissioned the Dasgupta Review on the Economics of Biodiversity. This paper, published in February 2021 by Cambridge University led by Professor Sir Partha Dasgupta, identifies the fundamental need to overhaul how society measures economic success if it is to stem the rapid decline of biodiversity that threatens civilisation itself. In response to this review, and showing its commitment to biodiversity net gain, the government has proposed amendments to the Environment Bill including the requirement for a new, historic legally binding target on species abundance in England for 2030, aiming to halt the decline of nature; and the legal requirement for NSIPs to deliver 10% biodiversity net gain. It is expected that a requirement for NSIPs to deliver 10% biodiversity net gain will be law by the time that this Application is examined.

Energy White Paper: Powering our Net Zero Future (2020)

- 5.5.3 The Energy White Paper published in December 2020 is one of the more recent government policies setting out how the UK will reach net zero emissions by 2050.
- 5.5.4 The Paper explains that it is likely that overall demand for electricity could double by 2050 due to the electrification of other sectors such as transport and increased use of clean energy replacing gas heating. Meeting this demand by 2050 would require *“a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target”*
- 5.5.5 It identifies the government’s aim for a fully decarbonised, reliable and low-cost power system by 2050 and that market conditions will determine the best solutions for very low emissions and reliable supply, at a low cost to consumers.
- 5.5.6 The Paper explains that the government is not targeting a particular generation mix however commits the government to maintaining the market conditions which stimulate the cost reductions that have been seen in the renewables energy market over the last five years. It does, however, state that it is possible to determine key characteristics of the future generation mix at this stage identifying that a *“low-cost, net zero consistent system is likely to be composed predominantly of wind and solar”*. It highlights that this will need to be complemented by technologies which provide power, or reduce demand, to manage intermittency. Currently this includes *“nuclear, gas with carbon capture and storage and flexibility provided by batteries, demand side response, interconnectors and short-term dispatchable generation providing peaking capacity, which can be flexed as required”*.
- 5.5.7 This Paper therefore highlights the government’s commitment to solar to achieve net zero targets and the need to provide this urgently.

National Infrastructure Strategy (2020)

- 5.5.8 The National Infrastructure Strategy (NIS) published in November 2020 sets out plans to transform the UK's infrastructure. The strategy is the government's response to recommendations made by the National Infrastructure Commission (NIC), which was set up to provide impartial, expert advice to the government on long-term infrastructure priorities. In July 2018, the NIC published a National Infrastructure Assessment which provided the foundation for many of the measures included within the NIS.
- 5.5.9 One of the aims of the NIS is to achieve net zero carbon emissions by 2050. The government acknowledges in the NIS that to deliver net zero, the share of generation from renewables needs to dramatically increase. It identifies that this can be achieved by the provision of greater generation capacity from onshore wind and solar. As recommended by the NIC, the NIS sets out plans to include solar PV in the auction rounds for Contracts for Difference which is the government's main mechanism for supporting low-carbon electricity generation. This incentivises investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high.
- 5.5.10 The NIS therefore demonstrates the government's commitment, including financial commitment, to supporting solar generation now.

A green Future: Our 25 Year Plan to Improve the Environment (2018)

- 5.5.11 The 25 Year Environment Plan published in 2018 sets out the government's 25 year plan to improve the environment within a generation.
- 5.5.12 It aims to achieve 10 goals which include: achieve clean air; achieve clean and plentiful water; achieve thriving plants and wildlife; reduce risk of harm from environmental hazards like flooding and drought; use resources from nature more sustainably and efficiently; enhance beauty, heritage and engagement with the natural environment; mitigate and adapt to climate change; minimise waste; manage exposure to chemicals; and enhance biosecurity.
- 5.5.13 Six key areas of policy are set out in the plan and include:
- a. Using and managing land sustainably (including embedding an 'environmental net gain' principle for developing and measuring natural capital, and including reducing flood risk).
 - b. Recovering nature and enhancing the beauty of landscapes (including developing a Nature Recovery Network and reviewing National Parks and AONBs).
 - c. Connecting people (including children) with the environment to improve health and wellbeing (including encouraging children to be close to nature, both in and out of school and greening out cities).

- d. Increasing resource efficiency and reducing pollution and waste (including achieving zero avoidable plastic waste by end of 2042).
- e. Securing clean, productive and biologically diverse seas and oceans (including a post Brexit new sustainable fisheries policy).
- f. Protecting and improving the global environment (including providing 'international leadership and leading by example' and 'leaving a lighter footprint on the global environment').

5.5.14 This plan therefore highlights the government's support for the reduction in the UK's carbon footprint; protection and enhancement of the natural environment; and ensuring land is managed with environmental gains which is of relevance to the Scheme.

6 Planning Appraisal of the Scheme

6.1 Introduction

- 6.1.1 This section presents an assessment of the compliance of the Scheme with themes resulting from a review of the planning policy identified in section 5 of this Planning Statement. Emphasis is placed on the Energy NPSs which are expected to form the primary policy context for the Secretary of State's decision. However, reference is made to the NPPF and local planning policies where considered relevant.
- 6.1.2 **Appendix B** of this Statement provides a table detailing the Scheme's compliance with all the relevant national and local planning policies identified. This table is also presented thematically. **Appendix D** provides an assessment of harm in relation to designated heritage assets which supports the analysis at section 6.5.

6.2 Meeting the Urgent Need to Deliver Nationally Significant Energy Infrastructure

- 6.2.1 Parts 2 and 3 of NPS EN-1 discuss the need for nationally significant energy infrastructure projects and explain the context and drivers for the identified energy infrastructure need, which principally comprise:
- a. the need to secure adequate energy supply to accommodate projected increased national energy use;
 - b. the need to replace closing electricity generating capacity;
 - c. the need to reduce greenhouse gas emissions to meet carbon targets by 2050;
 - d. the need for more electricity capacity and resilience; and
 - e. the need to diversify energy supply and reduce reliance on imports of fossil fuels.
- 6.2.2 Section 3.4 of NPS EN-1 sets out that the large scale deployment of renewable electricity generation is required in order meet the UK's carbon emissions targets and tackle climate change. At paragraph 3.4.5 it states:
- 6.2.3 *"Paragraph 3.4.1 above sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent."*
- 6.2.4 Paragraphs 3.1.3 and 3.1.4 of NPS EN-1 state that all applications for nationally significant energy infrastructure should be assessed on the basis that the need for such infrastructure has been demonstrated and that substantial weight should be given to the contribution that proposals would make towards meeting the identified energy infrastructure need.

- 6.2.5 Whilst solar is not specifically identified in NPS EN-3, as at the time of publication it was not proven at scale, NPS EN-3 does affirm the importance, set out in NPS EN-1, of the development of large-scale renewable energy infrastructure. At paragraph 1.1.1 it states:
- 6.2.6 *“Electricity generation from renewable sources of energy is an important element in the Government’s development of a low-carbon economy. There are ambitious renewable energy targets in place and a significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target.”*
- 6.2.7 Paragraphs 3.3.5 and 3.3.15 of NPS EN-1 put a time frame of the next 10 to 15 years for the provision of new low carbon developments (given the publication date of NPS EN-1 this would require delivery by 2026) and paragraph 3.2.3 of NPS EN-1 states that the weight attributed to the need for new energy capacity should be proportionate to the proposed extent of actual contribution to satisfying the need for a particular type of infrastructure.
- 6.2.8 It is noted that policy and legislation has moved on since the energy NPSs were published. One of the aims of the recently published NIS (referred to in section 5.5 of this Statement) is to achieve net zero carbon emissions by 2050 by dramatically increasing the share of generation from renewables. This is to be achieved by the provision of greater generation capacity from onshore wind and solar and economic support for the delivery of this. Further, the Energy White Paper: Powering our net zero future, published in December 2020 identifies that *“a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar”* and that the increase in electricity demand through decarbonisation of other sectors means *“a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target”* is needed.
- 6.2.9 The urgency of renewable energy infrastructure to address the drivers set out in NPS EN-1 has therefore accelerated. Section 4 of this Planning Statement and the **Statement of Need [EN010106/APP/7.1]** accompanying this Application explains this highlights that the Scheme will deliver significant amounts of low-carbon power before many other large-scale solar projects. Although all these other solar projects are needed, they are behind the Scheme in the development process. In addition, compared to other energy infrastructure solar is relatively quick to construct and its impacts are reversible, with removal of solar arrays and associated infrastructure after decommissioning being relatively simple and straightforward compared with other energy infrastructure.
- 6.2.10 Draft NPS EN-1 confirms and gives further weight to the position that is summarised in the above paragraphs, setting out the government’s up-to-date objectives and commitments for the energy system, and providing planning policy for NSIPs that is intended to facilitate the delivery of these objectives and meeting the government’s commitments.
- 6.2.11 At paragraph 2.3.2, Draft NPS EN-1 sets out that the Government’s three objectives of the energy system are to:

- a. Ensure security and reliability of energy supply;
- b. Provide affordable energy to consumers; and
- c. Cut greenhouse gas emissions, delivering carbon budgets and achieving net zero by 2050.

- 6.2.12 The same paragraph sets out that *“This will require a step change in the decarbonisation of our energy system”*, and paragraphs 2.3.3 to 2.3.4 of Draft NPS EN-1 go on to set out that a significant amount of energy infrastructure, including of large scale, will need to be delivered and the volume and proportion of energy supplied from low carbon sources will need to be *“dramatically”* increased. Paragraph 2.3.5 of Draft NPS EN-1 encapsulates the challenges facing the energy system: *“We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses”*.
- 6.2.13 Paragraph 3.3.21 of Draft NPS EN-1 sets out that, along with wind, the government expects solar to form the majority of generation capacity in a net zero, secure and cost-efficient energy system:
- 6.2.14 *“Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar”*.
- 6.2.15 Whilst Draft NPS EN-1 paragraph 3.3.13 acknowledges the role that smaller scale developments in helping to achieve the government’s objectives and commitments for the energy system, it explains that this, alone, will not be enough and that *“the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives”*. Paragraph 3.3.14 goes on to set out that large-scale centralised electricity generating facilities have numerous economic and other benefits, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.
- 6.2.16 In summary, Draft NPS EN-1 therefore sets out that the delivery of a large amount of solar generation capacity is an essential element required for delivery of the government’s energy objectives and legally binding net zero commitments. As such, paragraph 4.1.2 of Draft NPS EN-1 sets out that the Secretary of State should start with a presumption in favour of granting Development Consent to energy NSIPs covered by the Draft Energy NPSs (which includes solar):
- 6.2.17 *“The Energy White Paper emphasises the importance of the Government’s net zero commitment and efforts to fight climate change. Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.”*

- 6.2.18 Paragraph 158 of the NPPF also supports the transition to a low carbon future and expects the planning system to contribute to “*radical reductions in greenhouse gas emissions*” by supporting renewable and low carbon energy and associated infrastructure. Although it is recognised the Scheme is not to be determined under the TCPA 1990, the NPPF expects the determination of planning applications to ‘*not require applicants to demonstrate the overall need for renewable or low carbon energy*’ and ‘*approve the application if its impacts are (or can be made) acceptable*”.
- 6.2.19 Whilst local planning policies are not directly applicable to large scale solar, they do support proposals which provide low carbon energy generation as set out in the ECLP Policy ENV6 and JDMPD Policy DM8. Policy ENV6 does expect the wider environmental, social and economic benefits of proposals to outweigh residual significant adverse effects that cannot be mitigated.
- 6.2.20 In terms of how the Scheme will specifically address the need to reduce carbon emissions, the Scheme will deliver significant carbon savings. **Chapter 6 Climate change** of the Environmental Statement [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296 MWh of electricity with an average operational greenhouse gas intensity of 2.1 grams of carbon dioxide equivalent per kWh (gCO₂e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate. Furthermore, **Chapter 6 Climate change** of the Environmental Statement [EN010106/APP/6.1] acknowledges that it is likely that the land use change associated with the conversion of arable land to grassland during its 40 year operation would have a beneficial greenhouse gas impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), as grassland has a higher carbon sequestration value than cropland.
- 6.2.21 In summary, the Scheme meets the established urgent need for nationally significant renewable energy infrastructure set out in national policy by providing large amounts of low carbon energy quickly, An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES prepared to report the findings [EN010106/APP/6.1]. Overall, with appropriate mitigation implemented, this identifies limited residual significant adverse effects of the Scheme during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation. The Scheme is therefore considered to be in accordance with the relevant national and local policies relating to the need for and provision of renewable energy infrastructure.

6.3 Good design and climate change adaptation

- 6.3.1 Section 4.5 of NPS EN-1 sets out the principles for good design that should be applied to all energy infrastructure. It states at paragraph 4.5.1 that good design should “*produce sustainable infrastructure sensitive to place, efficient in the use of*

natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible”.

- 6.3.2 Paragraph 4.5.1 does, however, acknowledge that “the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area”. NPS EN-3 expects renewable energy NSIPs to demonstrate ‘good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology’ (paragraph 2.4.2) and NPS EN-5 also identifies that proposals for electricity networks infrastructure should demonstrate good design in their approach to mitigating potential adverse impacts (paragraph 2.5.1).
- 6.3.3 Draft NPS EN-1 sets out at section 4.6 that applicants should consider how ‘good design’ can be applied at the early stages of a project. It also recommends that applicants embed opportunities for nature inclusive design into their scheme and emphasises that wider impacts such as landscape and environmental impacts will be important factors in the design process.
- 6.3.4 Draft NPS EN-3 paragraph 2.51.4 and 2.51.5 set out that developers should consider the criteria for good design set out in section 4.6 of Draft NPS EN-1, particularly in terms of layout, future maintenance and retention of boundary vegetation. It also sets out that solar farms should be designed sensitively in order to minimise environmental effects, including on landscape (paragraph 2.51) and heritage assets (paragraph 2.53).
- 6.3.5 The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. Through the design process, the Applicant has taken account of the context and features of the sites and their surroundings in order to develop a good design that uses the landscape and landform in order to reduce the visibility of the Scheme and its impact on the landscape and sensitive receptors (see Figures 3-1 and 3-2). The design also sought to increase the biodiversity value of the Sites during the operation of the Scheme. The design decisions listed below helped with achieving these objectives and delivering good design.
- a. Siting the primary construction compound, BESS and substation in E33 on Figure 3-1 adjacent to reservoirs and Lee Farm, so that their massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape. The **Works Plans [EN010106/APP/2.2]** secures the location of the BESS and the on-site substations (Work Nos. 2 and 3).
 - b. Siting the BESS and substation in E18 on Figure 3-1 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east. The **Works Plans [EN010106/APP/2.2]** secures the location of the BESS and the on-site substations (Work Nos. 2 and 3).

- c. Siting the primary construction compound and the BESS and substation within W17 on Figure 3.2, so that it is in part adjacent to existing barns and bordered by the mature woodland of Sounds Plantation which aids in screening the structures from the west and in views from the east. The **Works Plans [EN010106/APP/2.2]** secures the location of the compound, BESS and the on-site substations (Work Nos. 8, 2 and 3).
- d. Siting the solar arrays away from Freckenham, Isleham and Worlington to avoid the Scheme resulting in the physical coalescence of settlements, and retaining the open character to the west of Beck Road, between Isleham and Freckenham. The **Works Plans [EN010106/APP/2.2]** identifies the green infrastructure around the solar arrays (Work No. 6).
- e. Conserving the field boundaries and the vegetation patterns, including the pine lines, overall by offsetting the solar panels from the field edges. This also retains views across the landscape to valued features including the pine lines in long distance views and vegetation adjacent to the Lee Brook. The **Works Plans [EN010106/APP/2.2]** identifies the green infrastructure around the solar arrays (Work No. 6).
- f. Implementing new woodland and hedgerows, as set out in the OLEMP to aid in visually screening the Scheme and improving the landscape structure, as well as new native grassland mixes beneath the solar panels to improve the range of fauna and increase the biodiversity across the Site in comparison to intensive agriculture, including pig farming. The draft DCO secures the OLEMP in Schedule 2.

- 6.3.6 The outcome of which is that the Scheme delivers good design, meeting the requirements of the NPSs and Draft NPSs in the context of efficiently delivering large scale renewable energy infrastructure whilst providing a new network of environmental features which deliver a range of ecosystem services, incorporating biodiversity, heritage, landscape and access.
- 6.3.7 The Design and Access Statement accompanying the Application explains the evolution of the design **[EN010106/APP/7.3]**. The Design and Access Statement also contains the Design Principles which the Scheme must accord with. The Design Principles are secured in Schedule 2 to the draft DCO. The construction of the Scheme has also considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the **Framework CEMP** (see **Appendix 16C** of the Environmental Statement **[EN010106/APP/6.2]**).
- 6.3.8 NPS EN-1 section 4.8 identifies how climate change should be considered as part of the design and assessed. Paragraph 4.8.6 expects assessments to use the UK's latest climate change projections and paragraph 4.8.9 expects an assessment for a higher level of protection for safety critical elements of NSIPs such as electricity substations. This is applicable to the Scheme due to the proposal to include electricity substations and BESS.

- 6.3.9 NPS EN-1 paragraph 4.8.5 expects applicants to consider the impacts of climate change “*when planning the location, design, build, operation and where appropriate decommissioning of the new energy infrastructure*”. Paragraph 2.4.1 and 2.4.2 of NPS EN-5 advises that with regard to electricity infrastructure the resilience of the project to climate change should be assessed in the ES and set out how it would be resilient to flooding, with reference to substations.
- 6.3.10 The NPPF at paragraph 154 requires new development to be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. Relevant local planning policies also expect new developments to demonstrate climate change adaptation
- 6.3.11 **Chapter 6: Climate Change** of the Environmental Statement [EN010106/APP/6.1] provides a Climate Change Resilience (CCR) review which assesses the resilience of the Scheme to projected future climate change impacts. The CCR uses the UK Climate Projections 2018 (UKCP 2018) data to determine the future baseline conditions and assess the risks associated with gradual climate change and an increased frequency of extreme weather events.
- 6.3.12 **Section 6.7 of Chapter 6: Climate Change** of the Environmental Statement [EN010106/APP/6.1] outlines a number of adaptation measures that have been incorporated into the Scheme design and measures that are proposed for the management of the construction and decommissioning phases to increase the resilience of the Scheme to climate change.
- 6.3.13 Design measures include the drainage design allowing for climate change projections and incorporating Sustainable Urban Drainage Systems (SuDS) features. This will ensure the surface water drainage strategy adequately attenuates and treats runoff from the Sites and minimises flood risk. Also there will be no development within fluvial Flood Zone 3b extents. There may be solar PV panels within Flood Zone 3a and to mitigate flood risk to these they will be raised on higher struts (as required by the Design Principles which are secured in Schedule 2 to the draft DCO). Substations and the BESS at the Sites are also proposed to be outside Flood Zones 2 and 3. To take into account future flood risk and potential breaches of defences at the potential locations for the Burwell National Grid Substation Extension, the Scheme proposes to raise its finished floor levels (as required by the Design Principles which are secured in Schedule 2 to the draft DCO). Further details of the measures are discussed in section 6.7 below.
- 6.3.14 The **Framework CEMP** (see **Appendix 16C** of the Environmental Statement [EN010106/APP/6.2]) and **Framework DEMP** (see **Appendix 16E** of the Environmental Statement [EN010106/APP/6.2]) set out the expectation that these phases of the Scheme will use lower-carbon and climate change resilient methods.
- 6.3.15 The design of the Scheme and the proposed management and design measures of its construction and decommissioning phases therefore illustrate that the Scheme will demonstrate good design in accordance with NPS EN-1 and Draft NPS EN-1, Draft NPS EN-3 and be resilient to climate change in accordance with NPS EN-1, Draft NPS EN-1, the NPPF and local planning policy.

6.4 Landscape and visual amenity

- 6.4.1 The Scheme is located within a predominantly rural open landscape which is influenced by agricultural, equestrian and mineral extraction activities; small and large villages; and the local and strategic highway network (principally the A11 and A14, which are adjacent to Sunnica East Site B and Sunnica West Site A).
- 6.4.2 An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in **Chapter 10: Landscape and Visual Amenity** of the Environmental Statement [EN010106/APP/6.1] in line with the requirements of NPS EN-1 paragraphs 5.9.5 to 5.9.7.
- 6.4.3 The Order limits and the study area (up to 2km from the Order limits) which has been used to assess landscape and visual amenity are not covered by any statutory landscape designations (e.g. National Parks or Areas of Outstanding Natural Beauty), which are given a high status of protection by NPS EN-1 paragraphs 5.9.9 and NPPF paragraph 176. There are also no areas of local landscape value designated in WSC and ECDC local development plans within 2km of the Order limits.
- 6.4.4 The following sections present the outcome of the landscape and visual assessment and the Scheme's compliance with planning policy relating to the protection of landscape character and visual amenity. NPS EN-1 (paragraphs 5.9.8 and 5.9.18 to 5.9.20) and Draft NPS EN-1 (paragraphs 5.10.9, and 5.10.20 to 5.10.22) acknowledge the fact that development of new energy infrastructure, at the scale and speed required to meet the current and future need identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. This needs to be considered in the context of the requirements of local planning policies which have not been developed for nationally significant infrastructure projects.

Landscape effects

- 6.4.5 Paragraphs 5.9.8 of NPS EN-1 and 5.10.9 of Draft NPS EN-1 explain that landscape effects "depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change" and "these factors need to be considered in judging the impact of a project on landscape". These factors are presented in **Chapter 10: Landscape and Visual Amenity** of the Environmental Statement [EN010106/APP/6.1] with **section 10.6** explaining the landscape baseline. **Table 10-3** identifies the sensitivity of the published landscape character types at national, county and neighbourhood levels. Tables 10.4 and Table 10.5 identify the sensitivity of the 44 local landscape character areas (LLCA) and the four Site level character areas defined by the Applicant following desk and field work. Further information is also provided by the figures [EN010106/APP/6.3] and appendices [EN010106/APP/6.2] supporting this chapter. The majority of the landscape character types identified have been considered to have medium to high sensitivity.
- 6.4.6 As noted above, and discussed in section 2, the main land use across the landscape area affected by the Scheme is intensive agriculture, characterised by

geometric fields of varying sizes often divided by drainage ditches and vegetation. The agricultural land use results in a generally 'open' character to the landscape, although there are notable areas of vegetation, in terms of field boundaries, roadside and residential garden vegetation and woodland blocks, such that the vegetation patterns are varied across the area. The vegetation includes 'pine lines', which are former pine shelterbelts and plantations which were planted in the 18th and 19th centuries to divide and enclose fields, as the pine trees established successfully in the poor soils. The 'pine lines' are now linear rows of tall pine trees which are present along Chippenham Road close to Sunnica West Site A and Sunnica West Site B. Mineral extraction activities are to the east of Sunnica East Site B and leisure uses to north of Sunnica West Site A. Equestrian uses are present in the area principally around Newmarket and are characterised by open and extensive grassed fields, studs, exercise tracks and training grounds.

- 6.4.7 The landform across the Order limits is predominantly low lying and flat with rivers, watercourses and drains that traverse the Order limits. The settlement pattern in the area is strongly related to the landform and watercourses, with villages located on localised areas of elevated land or at river crossings. A number of the surrounding villages also have designated conservation areas.
- 6.4.8 The road network influences the landscape character with the strategic highway network corridors across the southern and eastern parts of the assessment study area. The A14 extends between Newmarket and Exning and to the south of Kennett via the junction of the A1304, A14 and A11. The A1304 extends from this junction into the centre of Newmarket. Between the A1304 and the A14 are several railway lines which converge at Chippenham Junction. The A11 is east of Sunnica West Site A and Sunnica East Site B. There is then a network of local roads connecting the local villages adjacent to the Sites. The extent of PRow is varied due to the land uses, with large tracts of land, particularly across the central area and between Fordham, Isleham, Worlington and Freckenham with no designated PRow routes.
- 6.4.9 Although the study area for the assessment is outside and not close to nationally or locally designated landscapes, NPS EN-1 at paragraph 5.9.14 expects the consideration of local planning policies which have been based on landscape character assessment. Local planning policies in the ECLP, JDMPD and FHCS expect proposals to be sympathetic to, and respect, the capacity of the distinctive character areas identified in landscape character assessments and protect, conserve and, where possible, enhance local distinctiveness, landscape features and characteristics and the landscape character of settlement and their wider landscape settings.
- 6.4.10 NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that *"Virtually all nationally significant energy infrastructure projects will have effects on the landscape"* with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. Draft NPS EN-3 paragraph 2.51.6 sets out that *"the potential to mitigate landscape and visual impacts through, for example, screening with native hedges"* should be considered by applicants. As discussed in section 6.3, the Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme

and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area:

- a. Careful siting of the Scheme in the landscape by the structures being offset from pine lines, vegetation patterns and road networks;
- b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and
- c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the landscape structure, screening of the Scheme, and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington.

- 6.4.11 **Section 10.7 of Chapter 10: Landscape and Visual Amenity** of the Environmental Statement [EN010106/APP/6.1] explains further the specific design and mitigation measures integral to the Scheme. The mitigation design would be secured through the Landscape and Ecology Management Plan (LEMP) to be approved and implemented through requirements of the DCO prior to construction. An Outline LEMP is provided at **Appendix 10I** of the Environmental Statement [EN010106/APP/6.2]. A Framework Operation Environmental Management Plan (OEMP) is also provided in **Appendix 16F** of the Environmental Statement [EN010106/APP/6.2]
- 6.4.12 The assessment presented in **Chapter 10: Landscape and visual amenity** of the Environmental Statement [EN010106/APP/6.1] takes into account the landscape character sensitivity and the proposed mitigation strategy for minimising effects. It concludes that the Scheme would have temporary significant adverse effects on the landscape as a result of construction and decommissioning. Effects would be minimised where possible through measures set out in the Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP) including hoardings for the protection of retained vegetation and offsetting construction in relation to tree protection areas.
- 6.4.13 In terms of operational effects, the assessment concludes that the Scheme would introduce new land uses across the Sites and the introduction of an infrastructure character which would alter the 'open' character of the existing landscape. At year 1, with the exception of County landscape type 'Rolling Estate Chalklands', there are no likely significant adverse effects on the national and county level landscape character types due to there being barely noticeable alterations to the key characteristics of these types. Regarding the 'Rolling Estate Chalklands', this would experience partial loss to key characteristics as a result of the infrastructure introduced to all the Sites resulting in a moderate adverse effect, which would be significant. This would however be reduced at year 15 with the establishment of the landscape mitigation and the effect would not be significant. At the neighbourhood level, Freckenham rural 2 and Freckenham rural 3 landscape character types would experience moderate adverse effects which would be

significant at year 1 and year 15 of operation due to the partial alteration to the character areas. This is as a result of the introduction of the Scheme at Sunnica East Site A and Sunnica East Site B.

- 6.4.14 Of the 44 LLCAs defined by the Applicant in the study area, only two, LLCA 13 Sandlands Mosaic and LLCA 24 Lowland Estate Chalklands, would likely experience major adverse effects at year 1 of operation which would be significant. The effects upon LLCA 13 would be as a result of Sunnica East Site B and at LLCA 24 as a result of Scheme as a whole. This is because of the substantial alteration to these local landscape character areas. At operational year 15, these effects would be reduced to moderate adverse following the implementation of the measures set out in the LEMP. The Site level character types defined by the Applicant would also likely experience major adverse effects at year 1 of operation (with the exception of Sunnica West Site B Site landscape character area which would experience a moderate adverse effect) which would be significant because of the substantial alteration to these site level character areas. Given the establishment of mitigation planting by year 15, the effects would be reduced to moderate adverse, with the exception of Sunnica West Site B where there are likely to be no significant adverse effects.
- 6.4.15 The change to the landscape character, via the introduction of solar panels and associated infrastructure, is considered to be localised and would be reversed following the 40 year operation period. The landscape character during operation would also benefit from the changes to the land cover via new planting and grassland in comparison to the current agricultural land use. The extent of the proposed landscaping and the retention and enhancement of existing landscape features is shown on **Figures 3-1 and 3-2** and secured through Work No. 6 on the **Works Plans [EN010106/APP/2.2]**. Given this, and the careful siting of infrastructure proposed, it is considered that the Scheme accords with NPS EN-1 paragraphs 5.9.8 and 5.9.17, Draft NPS EN-1 paragraphs 5.10.9 and 5.10.19 and Draft NPS EN-3 paragraph 2.51.6 in relation to minimising landscape harm.
- 6.4.16 Furthermore, in response to the Secretary of State's need to consider landscape harm versus benefits (including need) of energy NSIPs as required by paragraph 5.9.15 of NPS EN-1 and paragraph 5.10.17 of Draft NPS EN-1, the local landscape harm which is likely to occur during the various phases of the Scheme is considered to be offset by the significant national benefits of the Scheme over its 40 year operational period, as outlined in section 4 and 6.2 of this Planning Statement and explained in detail in the **Statement of Need [EN010106/APP/7.1]**.

Visual amenity

- 6.4.17 NPS EN-1 paragraph 5.9.18 and Draft NPS EN-1 paragraph 5.10.20 recognise that proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites and that the Secretary of State should '*judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project*'. Paragraph 2.48.4 of Draft NPS EN-3 identifies the visual amenity as being one of the two main impact issues that is likely to determine distances of the

solar farm development to residential receptors. At paragraph 2.51.4 it sets out that considerable effort is expected to be made to minimise visual impact of solar PV arrays in the design of the development. Local planning policies expect proposals to protect the character of PRow and the visual amenity of the landscape as well as incorporate appropriate mitigation to minimise intrusion and visual impact.

- 6.4.18 The visual impact assessment presented in **Chapter 10: Landscape and Visual Amenity** of the Environmental Statement [EN010106/APP/6.1] has determined the visual context affected by the Scheme. This has been achieved through the establishment of a Zone of Theoretical Visibility (see **Figures 10a to 10d** of the Environmental Statement [EN010106/APP/6.3]) supplemented through fieldwork. 88 viewpoints have been identified as representative of views in the study area including from residential properties, PRow users, the Jockey Club, visitors and residents at Chippenham Hall Park and motorists. These are at a range of distances from the Scheme, including from residents in close proximity to the Order limits. There are also several viewpoints along the road networks, as these are often the only public means for views across the landscape, given the limited number of PRow across parts of the study area. **Figure 10-12** of the Environmental Statement [EN010106/APP/6.3] provides an overview of the viewpoint locations. These have been discussed and agreed with the landscape officers representing the host authorities. Section 10.6 of **Chapter 10: Landscape and Visual Amenity** explains the visual context in detail which is supported photography (see **Figures 10-20 to 10-83** [EN010106/APP/6.3]). Table 10-6 sets out the sensitivity of the representative views.
- 6.4.19 The assessment of visual effects presented in **Chapter 10: Landscape and Visual Amenity** of the Environmental Statement [EN010106/APP/6.1] concludes that the Scheme would have temporary significant adverse visual effects as a result of construction and decommissioning experienced by motorists, residents and users of PRow with close views into the Sites, Grid Connection Route A and Grid Connection Route B. Similar to landscape effects these would be minimised where possible through measures set out in the CEMP and DEMP including hoardings around construction works and keeping tidy and neat working areas.
- 6.4.20 At year 1 of operation, 25 of the views would experience significant adverse effects. Two of these views would experience major adverse effects. These are Viewpoint 12: residents at Lee Farm who would experience extensive change in their view as a result of the introduction of Sunnica East Site A and Viewpoint 41: recreational users PRow (bridleway) 204/5, south-east of Snailwell who would experience extensive change in their view as a result of the introduction of Sunnica West Site A.
- 6.4.21 As discussed above at 6.4.9, the Scheme has incorporated a design strategy which has sought to minimise harm on the landscape and reduce adverse visual effects where possible. The assessment concludes that the effectiveness of this strategy means that, at year 15, only one representative view which is the recreational users and users of the training grounds at the Limekilns (Viewpoint 38) (see **Figure 10-12** of the Environmental Statement [EN010106/APP/6.3]) would likely experience a moderate adverse effect which is considered to be

significant. This is due to partial change to the composition of the existing view. The view is an elevated position and the open character of the intervening foreground, which forms a part of the wider Gallops, means additional mitigation measures such as off-site planting is not considered to be practicable in retaining the equestrian land use across the Gallops. The view would also still retain views across to Sunnica West Site A due to its elevation. Additional mitigation for this effect is therefore not possible.

- 6.4.22 In summary, the design of the Scheme minimises the visual impact upon residents, recreational users and motorists passing through the area, in accordance with the requirements of NPS EN-1, Draft NPS EN-1 and Draft NPS EN-3. In addition, it provides the benefits of new green infrastructure as well as connectivity through the introduction of permissive routes. In response to NPS EN-1 paragraph 5.9.18 and Draft NPS EN-1 paragraph 5.10.20, it is not therefore considered that the limited (in time and geographically) and localised visual effects predicted would outweigh the national benefits of the Scheme.

6.5 Cultural heritage

- 6.5.1 The Scheme is located within an area which has cultural heritage assets of varying type, significance and value. The impact of the Scheme upon these heritage assets has been a key consideration in the development of the Scheme's design. The Applicant has been, and continues to be, committed to understanding the significance and value of the heritage assets present within the Order limits and affected by the Scheme and has proposed avoidance and mitigation strategies wherever possible.
- 6.5.2 In 2019 and 2020 geophysical surveys were undertaken across the Sites and, during 2021 where access has allowed, also along the Grid Connection Route A and Grid Connection Route B to determine archaeological sensitivity. Trial trenching of the Sites took place between January and May 2021 to further investigate the area and ground truth the geophysical results. The fieldwork has been undertaken in consultation and agreement with the SCC and CCC Archaeologists. Consultation with Historic England has also taken place where relevant.
- 6.5.3 **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1] and its supporting appendices [EN010106/APP/6.2] provide an assessment of the likely effects of the Scheme upon heritage assets, including a description of the significance of the heritage assets, the contribution of their setting to their significance as well as the results of archaeological desk-based and field investigations. Visualisations have also been prepared to inform the assessment. These are **Figures 10-12 to 10-13** of the Environmental Statement [EN010106/APP/6.3]. This accords with NPS EN-1 paragraphs 5.8.8, 5.8.9 and 5.8.10 and section 2.53 of Draft NPS EN-3.

Designated heritage assets

- 6.5.4 There are no designated heritage assets located within the Order limits with the exception of (1) a Scheduled Monument known as the Four Bowl Barrows north of the A11/ A14 Junction A, adjacent to the A11, and (2) a section of the

Chippenham Hall Grade II Registered Park and Garden, both of which are within the Order limits at Sunnica West Site A. Designated assets within the surrounding area of the Order limits include other Scheduled Monuments; Listed Buildings (of all grades); and Conservation Areas within the nearby villages of Isleham, Freckenham, Chippenham, Snailwell, Fordham and Burwell as well as the town of Newmarket. There are no World Heritage Sites; Protected Wreck Sites; Protected Military Remains, Registered Battlefields within or close to the Order limits and so the Scheme does not affect these types of designated assets.

- 6.5.5 NPS-EN1 paragraph 5.8.14 states that: “There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset resulting from its alteration or development in its setting should require clear and convincing justification”.
- 6.5.6 Paragraph 5.9.21 of Draft NPS EN-1 states that: *“When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.”*
- 6.5.7 NPPF paragraph 199 requires the decision maker to *“give great weight to the conservation of designated heritage assets, and that the more important the asset, the greater the weight”*. In the context of the Scheme, the greatest weight is therefore to be given to the seven Scheduled Monuments and one Grade I listed building affected by the Scheme, with lesser weight given to the three Grade II* and five Grade II listed buildings; the one Grade II Registered Park and Garden and four Conservation Areas affected.
- 6.5.8 NPS EN-1 paragraph 5.8.15 states that. *“Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC (now the Secretary of State) should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.”* Draft NPS EN-1 paragraph 5.9.24 sets out a similar test in the event that a development would lead to substantial harm or total loss of a heritage asset.
- 6.5.9 The NPPF and its supporting guidance in the NPPG provide more up to date policy than NPS EN-1 with regard to the assessment of harm. Paragraphs 199 to 203 of the NPPF introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting and identify that this harm ranges from less than substantial through to substantial. Paragraph 201 of the NPPF has the same direction to refuse consent as NPS EN-1 paragraph 5.8.15.

- 6.5.10 **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1] concludes that there will be no physical impacts on designated assets as a result of the Scheme however effects are predicted on the setting of assets as a result of its construction and operation.
- 6.5.11 As a result of the Scheme, residual significant moderate adverse effects on the heritage value and their significance of the following three designated heritage assets are identified in the ES:
- a. Bowl barrow on Chalk Hill, 380m north west of Chalkhill Cottages (Scheduled Monument; NHLE 1018097) which is adjacent to the Order limits at Sunnica East Site B.
 - b. Four bowl barrows north of the A11/A14 junction, part of the Chippenham barrow cemetery (Scheduled Monument; NHLE 1015246) located within the Order limits at Sunnica West Site A; and
 - c. Chippenham Grade II Registered Park and Garden (RPG) (NHLE 1000615) – a section known as the avenue located within the Order limits at Sunnica West Site A.

Harm Assessment

- 6.5.12 In response to whether the Scheme would have substantial harm on designated heritage assets, **Appendix D** of this Planning Statement sets out the harm predicted upon designated heritage assets. It considers the potential for the three designated heritage assets, which have been assessed in the ES as having significant adverse effects (referred to above), to have substantial harm taking into account their significance and the impacts expected. The assessment concludes that the Scheme would not result in substantial harm to these designated assets.
- 6.5.13 The assessment of the Bowl barrow on Chalk Hill and the Four bowl barrows north of the A11/A14 junction Scheduled Monuments explains that the assets form part of a larger barrow landscape, alongside other scheduled examples and those identified during fieldwork for the Scheme. The scheduled examples represent the most visible within the landscape; however, there remains a tangible link between the remaining monuments, even where not visible.
- 6.5.14 The assessment does, however, acknowledge that the setting of the barrows has changed significantly as the landscape has evolved both in terms of modern development (settlements, A11/A14 road building and quarrying activities) and the agricultural landscape. The introduction of the Scheme represents a continuation of this evolution. However, there will be an impact on the appreciation of the barrows as rural features. While the barrows are not visible from the majority of the other assets in the wider barrow landscape, the assessment concludes that there remains an effect resulting from the introduction of the Scheme on their understanding within the landscape. The ability to appreciate their key characteristics is, however, maintained. This therefore results in less than substantial harm on these assets. With regard to the Four bowl barrows north of the A11/A14 junction Scheduled Monument, as this asset is within the Order limits but outside the developable area the operation of the Scheme will bring protection

to the barrows from the potential for further plough damage as the land within which they are located is currently in agricultural use. It is also recognised that any harm to these assets from the Scheme will be reversible, lasting for the 40 year duration of the Scheme. Following decommissioning there will no impact. The assets are therefore preserved for future generations and in conclusion there would be less than substantial harm on this asset.

- 6.5.15 The assessment outlines that the Grade II Registered Park and Garden at Chippenham Hall is an example of a 19th century landscaped park with elements of 18th century features surviving. The park and garden is set out around Chippenham Hall and is enclosed by tall walls. This element of the RPG will not be affected by the Scheme. The setting of the park will, however, experience a change through alterations within the surrounding agricultural landscape. Specifically, the former Avenue to the south is included within the Order limits and will experience glimpsed views of the development. This change will alter the appreciation of the Avenue, but its function will remain. These alterations will therefore result in less than substantial harm to this asset which, given it is Grade II listed, is of medium value. The harm to this asset will be reversible, lasting for the 40 year duration of the Scheme. Following decommissioning there will no impact. The asset is therefore preserved for future generations.
- 6.5.16 **Appendix D** explains that the harm to all other designated heritage assets, which are likely to experience negligible and minor adverse effects as a result of the Scheme's very low and low impact on these assets, would be less than substantial harm and at the lower end of the less than substantial harm spectrum. Effects on the significance of these assets are explained in **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1].

Harm policy test

- 6.5.17 NPS EN-1 at paragraph 5.8.12 expects the Secretary of State, in considering the impact of project on any heritage assets, to take into account "*the particular nature of the significance of the heritage assets and the value that they hold for this and future generations*". Paragraph 5.8.15 states: "*Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss*". Similarly, Draft NPS EN-1 paragraph 5.9.23 states that "*The Secretary of State should give considerable importance and weight to the desirability of preserving all designated heritage assets. Any harmful impact on the significance of a designated heritage asset should be given significant weight when weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.*" Paragraph 202 of the NPPF also states that "*where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal*".
- 6.5.18 The Secretary of State therefore needs to weigh the public benefits of the Scheme against the harm to designated heritage assets. This should consider the

importance of the assets and the value they hold for this and future generations, the level of harm and the public benefits provided by the Scheme.

- 6.5.19 In response to this policy test, as noted above, the designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the less than substantial harm spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. Mitigation and enhancement incorporated into the Scheme design minimises the harm to the setting of all designated assets as far as possible. This includes:
- a. Sensitive screening to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. The proposed mitigation planting has also taken into consideration the surrounding landscape character and focuses on the enhancement of existing vegetation.
 - b. Significant setbacks and buffer zones from settlements are proposed to ensure that settlements remain isolated within the landscape.
 - c. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure.
- 6.5.20 With regard to Chippenham Park RPG, the Gardens Trust⁴ in their section 42 consultation response outline that the current state of the Avenue (a former driveway to Chippenham Hall) is poor with its surface degraded and its boundaries much overgrown. Their response along with Historic England's response supports the planting proposed to reduce adverse visual impacts with the Gardens Trust confirming that this would mitigate harm to the setting of the RPG.
- 6.5.21 In addition to the proposed mitigation strategy, the Scheme is proposed to be operational for 40 years with its decommissioning secured through a DCO requirement. There will therefore be no permanent loss of the significance of designated assets as a result of the Scheme allowing future generations to retain an understanding of their settings. A benefit of the Scheme will also be to take one of the Scheduled Monuments out of agricultural use thereby reducing plough damage to this asset during the operation of the Scheme.
- 6.5.22 Section 4 and section 6.2 of this Planning Statement summarise the significant public benefits and need for the Scheme in relation to urgently delivering low carbon renewable energy to meet the aim of decarbonising the UK's electricity

⁴ The Gardens Trust is a statutory consultee for TCPA 1990 applications with regard to Grade II RPGs

supplies by 2050; providing security of supply as well as affordability for end consumers. The **Statement of Need [EN010106/APP/7.1]** explains in detail the compelling case for the Scheme.

- 6.5.23 In summary, it is considered that the significant public benefits of the Scheme outweigh the less than substantial harm expected to designated heritage assets during the stages of the Scheme's time limited lifetime.

Non-designated heritage assets

- 6.5.24 NPS EN-1 paragraph 5.8.6 and paragraph 203 of the NPPF state that the decision maker should also consider the impacts on other non-designated heritage assets, and paragraph 5.8.12 of NPS EN-1 sets out that for any heritage asset the particular significance of the asset and the value that it holds for this and future generations should be taken into account. Draft NPS EN-1 sets out at paragraph 5.9.26 that *"In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."* The assessment of the effects of the Scheme on non-designated heritage assets is reported in **Chapter 7: Cultural Heritage** of the Environmental Statement **[EN010106/APP/6.1]**.
- 6.5.25 The assessment identifies that there will be significant adverse effects upon non-designated archaeological assets (both recorded within the Historic Environment Record and identified through the fieldwork undertaken) within the Sites and the land for Grid Connection Route B. This is due to the potential for physical impact upon these assets from the solar PV and associated infrastructure as well as the cable route groundworks in relation to the Grid Connection Route B.
- 6.5.26 The Applicant's geophysical investigation of the Order limits in 2019 and 2020 has already led to the removal of ten areas of high value and thus significant archaeological activity (totalling approximately 97 ha) from the developable area of the Sites. These areas have been retained within the Order limits and are proposed to be managed as native grassland. This takes them out of the Scheme's development footprint but also provides the benefit that they will no longer be in arable agricultural use thereby avoiding plough damage and will be preserved in situ for the operational lifetime of the Scheme.
- 6.5.27 NPS EN-1 paragraph 5.8.22, Draft NPS EN-1 paragraph 5.9.35, and NPPF paragraph 205 expect decision making to ensure that appropriate procedures are in place for the identification and treatment of yet undiscovered heritage assets with archaeological interest discovered during construction. Design mitigation is proposed to minimise the direct physical impact upon the non designated assets already identified and any yet undiscovered remains during construction. This includes:
- avoiding areas of significant archaeological potential. Whilst as a result of the extensive field work to date these areas have been avoided, flexibility is built into the Scheme design as shown on the **Works Plans [EN010106/APP/2.1]**. There are therefore options for alterations to construction methodology or placement of panels and infrastructure if, through any remaining field

evaluation, significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of these assets.

- b. minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains; and
- c. installing buffer zones around any sensitive areas during construction.

6.5.28 If, in the unlikely event, the above design mitigation cannot be applied to the management of the archaeological resource, it is proposed that:

- a. A programme of archaeological fieldwork and recording will be implemented for archaeological remains within the footprint of the Scheme. Any excavation work will be targeted upon those assets that would maximise knowledge gain in order to answer Scheme and site-specific research questions. Some sites may only warrant further investigation, rather than full-scale excavation.
- b. Where non-intrusive trenching methods are required for cable routes, a strategy will be developed which will detail the monitoring of this, and it will include an action plan detailing the required mitigation in the event that there is any breakout in the vicinity of known archaeological remains. Where non-intrusive methods are not possible, archaeological strip, map and record excavation will be carried out.
- c. Archaeological mitigation fieldwork will be undertaken prior to construction works. The mitigation requirements are set out in the **Appendix 16C: Framework CEMP** of the Environmental Statement [EN010106/APP/6.2] submitted as part of the Application and this will be secured with a detailed CEMP being a requirement of the DCO prior to construction commencing.
- d. There will be consultation and agreement of the written scheme of archaeological evaluation, archaeological mitigation strategy and written scheme of archaeological mitigation measures with SCC and CCC. A specific requirement relating to the agreement and implementation of these is provided for in the **draft Development Consent Order [EN010106/APP/3.1]**.

6.6 Biodiversity

- 6.6.1 NPS Paragraph 5.3.3 and Draft NPS EN-1 paragraph 5.4.3 state that the ES should clearly set out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. NPS EN-1 paragraphs 5.3.8, 5.3.9, 5.3.10, 5.3.11 and 5.3.13, and Draft NPS EN-1 paragraphs 5.4.7, 5.4.8, 5.4.9, 5.9.10 and 5.4.12 expect the Secretary of State to attach appropriate weight to these ecological receptors noting the most important are those identified through international conventions and European legislation and to consider those that are also proposed for designation.
- 6.6.2 As a general principle, NPS EN-1 paragraph 5.3.7 expects development to “*avoid significant harm to biodiversity and geological conservation interests, including*

through mitigation and consideration of reasonable alternatives but where significant harm cannot be avoided, then appropriate compensation measures should be sought". Draft NPS EN-1 paragraph 5.4.6 sets out the same principle. The NPPF at paragraph 180 and relevant local planning policies such as ECLP policy ENV7 and JDMPD policy DM10 go further and direct the decision maker to refuse consent if significant harm to biodiversity resulting from a development cannot be avoided, mitigated or compensated for. NPS EN-3 further adds that renewable energy NSIPs should demonstrate 'good design' by mitigating effects on ecology. Draft NPS EN-3 sets out a similar principle and also identifies at paragraph 2.50.8 that solar farms have the potential to increase the biodiversity value of a site, in particular if the land was previously intensely managed. It sets out that: *"In some instances, the increase in biodiversity caused by the repurposing of previously developed or intensely managed land for solar generation may equate to a net positive impact."*

- 6.6.3 Paragraph 2.50.10 of Draft NPS EN-3 sets out that where there are proposed biodiversity enhancements incorporated within solar farm developments, these should aim to achieve biodiversity net gain in line with the ambition set out in the 25 Year Environment Plan and should take account of the factors set out in section 5.4 of Draft NPS EN-1. These include embedding opportunities for nature inclusive design in the design process. Paragraph 5.4.5 of Draft NPS EN-1 sets out that the Secretary of State should have regard to the aims and goals of the Government's 25 Year Environment Plan when making their decision. It also acknowledges that the benefits of significant low carbon infrastructure in themselves may include benefits for biodiversity and that those benefits may outweigh other harm to biodiversity interests.
- 6.6.4 **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1] provides an assessment of the Scheme's impact on ecological receptors and is supported by extensive survey work across the Order limits to confirm the ecological habitats and species likely to be affected by the Scheme. In accordance with NPS EN-1 paragraph 5.3.3 and Draft NPS EN-1 paragraph 5.4.3, sites of geological conservation importance have been considered but are not located within or close to the Order limits and have therefore not been identified as receptors requiring assessment. Consultation with Natural England; RSPB and the relevant wildlife trusts has taken place to seek feedback on the assessment approach and proposed mitigation design.

Internationally designated ecological sites

- 6.6.5 Paragraphs 4.3.1 and 5.3.9 of NPS EN-1 and paragraph 5.4.8 of Draft NPS EN-1 set out that the Conservation of Habitats and Species Regulations 2017 (as amended) require the decision maker to consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Local planning policy also expects ecological assessments to support development proposals and requires the protection of international designations, with ECLP policy ENV7 refusing consent if there are adverse impacts on sites of international importance *"unless there are exceptional overriding reasons of public interest (human health, public safety or environmental benefit)"*, and policy DM10

of the JDMPD stating that: “Proposals for development which would adversely affect the integrity of areas of international nature conservation or geological importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).”

- 6.6.6 To support the Secretary of State with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a **Habitats Regulations Assessment: Report to Inform an Appropriate Assessment** is provided at **Appendix 8M** of the Environmental Statement **[EN010106/APP/6.2]** (HRA Report). In accordance with NPS EN-1 paragraph 4.3.1, Natural England have been consulted in the process of producing the HRA Report. The HRA Report identifies seven European Sites present within 10km of the Order limits. It notes that the Fenland SAC is comprised of three individual sites: Wicken Fen, Woodwalton Fen, and Chippenham Fen, with the latter being adjacent to the Order limits at Sunnica West Site B. Chippenham Fen is also designated as a Ramsar site. The HRA Report at **Appendix 8M** of the Environmental Statement **[EN010106/APP/6.2]** confirms that no additional SACs are designated for highly mobile species, such as bats, within 30km of the Order limits.
- 6.6.7 Screening of these sites for likely significant effects has been undertaken and identified that the following pathways exist for which likely significant effects may occur (no other pathways were identified by the screening exercise):
- a. Fenland SAC: Habitat loss and/or degradation – degradation to designated habitats through airborne pollutants.
 - b. Chippenham Fen Ramsar site: Habitat loss and/or degradation – degradation to designated habitats and habitats supporting designated fauna through airborne pollutants and dust deposition.
 - c. Breckland SPA: Physical displacement of Stone Curlew from functionally linked land – loss of nesting and foraging habitat within the Scheme used by species occurring outside the designated site boundary; and construction noise and visual disturbance – disturbance to sensitive species occurring within or outside the designated site boundary during construction.
- 6.6.8 Mitigation measures for these effects are proposed and include implementing a CEMP and DEMP. These are secured as a requirement of the DCO, which requires the CEMP and DEMP to be in accordance with the framework CEMP and framework DEMP submitted with the application for development consent. They include mitigation measures for construction dust and construction disturbance to Stone Curlew associated with the Breckland SPA. To mitigate impacts upon Stone Curlew birds the delivery of habitat to offset the loss of breeding habitat for these birds is required and will take place prior to the construction of that part of the Scheme. A summary of the mitigation for Stone Curlew is set out in the section below regarding protected species and outlined in the **Offsetting habitat provision for stone curlew specification [EN010106/APP/6.6]**.
- 6.6.9 Following the implementation of the mitigation the HRA Report at **Appendix 8M** of the Environmental Statement **[EN010106/APP/6.2]** concludes that the Scheme

will have no adverse effect on the integrity of any European sites alone or in combination with other projects and plans and therefore there are no residual effects that will constitute an adverse effect on the integrity of European Sites either alone or in combination with other plans or projects.

Nationally designated ecological sites

- 6.6.10 Paragraph 5.3.11 of NPS EN-1 states that development consent should not normally be granted “[w]here a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments)” with an exception made “where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs”. This principle is also set out in paragraph 5.4.10 of Draft NPS EN-1, paragraph 180 of the NPPF and local planning policy (ECLP policy EN7 and JDMPD policy DM10).
- 6.6.11 There are no statutory national nature conservation sites within the Order limits. **Table 8-4 in Chapter 8: Ecology and Nature Conservation** of the Environmental Statement **[EN010106/APP/6.1]** identifies eight SSSIs within 2km of the Order limits, these being Chippenham Fen and Snailwell Poor’s Fen SSSI (which is part of the Fenland SAC); Snailwell Meadows SSSI; Brackland Rough SSSI; Red Lodge Heath SSSI; Cherry Hill and The Gallops, Barton Mills SSSI; Newmarket Heath SSSI; Devil’s Dyke SSSI; and Breckland Forest SSSI.
- 6.6.12 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement **[EN010106/APP/6.1]** presents an assessment of the likely significant impacts of the Scheme on these sites and concludes that with embedded mitigation there are no direct or indirect impacts on SSSIs and therefore no potential for adverse residual effects as a result of the construction, operation or decommissioning of the Scheme. The embedded mitigation to avoid indirect impacts during construction and decommissioning include:
- a. measures such as security fencing and buffers zones to avoid incursion on SSSIs adjacent to the Order limits at Sunnica West Site B;
 - b. sensitive lighting design so that lighting would not be directed outwards from the Site in order to minimise light disturbance to species associated with these habitats; and
 - c. the implementation of standard environmental protection measures during construction and decommissioning which include measures such as dust suppression and pollution prevention.
- 6.6.13 These measures are set out in the **Framework CEMP** (see **Appendix 16C** of the Environmental Statement **[EN010106/APP/6.2]**) and **Framework DEMP** (see **Appendix 16E** of the Environmental Statement **[EN010106/APP/6.2]**) and will be secured through the implementation of a detailed CEMP and DEMP which is secured by the requirements of the DCO.

- 6.6.14 In summary, the Scheme therefore accords with NPS, Draft NPS, NPPF and local planning policies with regard to impacts on statutory national nature conservation sites.

Locally designated sites

- 6.6.15 Paragraph 5.3.13 of NPS EN-1 and paragraph 5.4.12 of Draft NPS EN-1 state that decision-makers should give due consideration to sites of regional and local biodiversity and geological interest, including Regionally Important Geological Sites, Local Nature Reserves and Local Sites. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent. The NPPF (paragraph 174) gives similar protection to these sites.
- 6.6.16 Local planning policy also gives protection to such sites. ECLP policy ENV7 states that proposals which would cause harm to such sites *'will not be permitted unless the need for, and benefits of development in that location outweigh the potential harm to nature conservation interests.'*
- 6.6.17 A desk study has confirmed that there are no statutory locally designated sites within 1km of the Scheme. **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] confirms that there are anticipated to be no adverse effects on any statutory locally designated sites.
- 6.6.18 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] identifies 29 non-statutory locally designated sites within 2km of the Order limits. These are listed in Table 8.5 and include 26 County Wildlife Sites (CWS); two sites designated as Protected Road Verge (PRV) for their ecological importance and one Roadside Nature Reserves (RNR). Seven CWS are located within 100m of the Order limits and four CWS are within the Order limits. These are:
- Worlington Heath County Wildlife Site (CWS) and Badlingham Lane CWS are within the north-west part of Sunnica East Site B;
 - Part of the Snailwell Grasslands and Woods CWS which is along the River Snail is within the western part of Sunnica West Site B; and
 - Havacre Meadows and Deal Nook CWS which is crossed by Grid Connection Route A.
- 6.6.19 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] concludes that with embedded mitigation such as the CWSs within the Order limits not being subject to development; implementation of appropriate buffer zones and fencing; and standard construction management protection measures for pollution prevention and dust suppression there are expected to be no significant effects as a result of the construction or operation of the Scheme.
- 6.6.20 As the Scheme is not expected to lead to any significant effects on sites of local biodiversity and geological interest, it therefore complies with Paragraph 5.3.13 of

NPS EN-1, paragraph 5.4.12 of the Draft NPS EN-1 and Paragraph 174 of the NPPF.

Protected species and habitats of importance

- 6.6.21 Many individual wildlife species receive statutory protection under a range of legislative provisions and other species and habitats have also been identified as being of principal importance for the conservation of biodiversity. Paragraph 5.3.8 of NPS EN-1 states that the Secretary of State should ensure that “*appropriate weight is attached to...protected species; habitats and other species of principal importance for the conservation of biodiversity.*” Paragraph 5.4.7 of Draft NPS EN-1 sets out the same principle and local planning policies also protect these habitats and species.
- 6.6.22 The Scheme has been designed so that impacts upon important habitats (comprising woodland, grassland, hedgerow and ponds) are avoided or reduced, where reasonably practicable.
- 6.6.23 A desk study conducted and summarised within **Table 8-6 of Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] identifies broad habitat types within the Order limits. A desk study and ecological surveys have also been undertaken to gather baseline information on protected and notable species and habitats within and in the vicinity of the Order limits. This has included surveys of aquatic species; terrestrial habitats and flora; hedgerows; terrestrial invertebrates; Great Crested Newt; reptiles; wintering (non breeding birds); breeding birds; bats; and riparian mammals. The results of the surveys are presented in **Appendix 8B to 8L** of the Environmental Statement [EN010106/APP/6.2].
- 6.6.24 The assessment upon habitats of importance and protected species that are identified as likely to be affected is presented in **Chapter 8: Ecology** of the Environmental Statement [EN010106/APP/6.1]. This concludes that taking into account embedded protection measures and Scheme design, there are anticipated to be no potential significant adverse effects on any relevant habitat types or protected and notable species as a result of the construction, operation or decommissioning of the Scheme.
- 6.6.25 The embedded mitigation measures that have been incorporated into the management of the construction (and where relevant decommissioning) phase have been set out in **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1], **Appendix 16C: Framework CEMP** of the Environmental Statement [EN010106/APP/6.2] and the **Framework DEMP** which is provided at **Appendix 16E** of the Environmental Statement [EN010106/APP/6.2]. These measures include:
- a. following industry good practice and environmental protection legislation to manage water pollution, dust and noise;
 - b. implementing a sensitive lighting scheme to minimise light disturbance to species;

- c. avoiding works within 10m of watercourses and where crossing watercourse using boring, micro-tunnelling or moling methods, with appropriate setbacks from the top of the banks to protect Otter and Watervole as well as the watercourses themselves;
- d. undertaking vegetation clearance in advance of construction and at an appropriate time of year where practicable (ideally in September or October, concordant with the requirements for avoidance of nesting birds i.e. March to August (inclusive)) or undertaking such works utilising an appropriate methodology and under ecological supervision so as to avoid incidental injuring or killing of reptiles and amphibians and breeding birds; and
- e. providing buffers to construction activity along Grid Connection Route A and Grid Connection Route B. These comprise a 30 m buffer around any identified Badger setts, and a 15 m buffer to trees with bat roost potential, where possible;
- f. for the protection of Stone Curlew, construction will be phased so that areas within 500m of the new habitat provisions are developed outside the Stone Curlew breeding season of March to October and that the replacement provisions are ready for use by Stone Curlew by the breeding season at the start of construction. All construction staff working within Sunnica East Sites A and B will also be given a toolbox talk regarding the sensitivity of Stone Curlew.

6.6.26 These measures will be included in the LEMP and CEMP to be secured by the DCO which will accord with the **Framework CEMP** at **Appendix 16C** of the Environmental Statement [EN010106/APP/6.2] and **Outline LEMP** at **Appendix 10I** of the Environmental Statement [EN010106/APP/6.2] which accompany the Application.

6.6.27 Throughout the Scheme, a range of new habitats will be provided including bare ground, grassland, hedgerow, tree and scrub planting, all of which will increase the biodiversity of the Sites. Grassland will be provided adjacent to, and beneath, the solar panels to increase the diversity of flora in comparison to existing intensive agriculture and provide new habitat and niches to encourage other fauna such as birds and invertebrates. Vegetation would be established through natural regeneration or from seed collection from the grasslands identified within the relevant Scheme areas and through a suitable long-term habitat management regime. A total of 87ha within Sunnica East Site A; 22.7ha within Sunnica East Site B; 71.7ha within Sunnica West Site A and 38.0ha within Sunnica West Site B will not be subject to development and have been set aside within the Scheme design for creation of biodiverse habitats. 50.7ha of tree planting is proposed and 7.4km of hedgerow infill planning and creation is proposed within the Sites and along Grid Connection Route A and Grid Connection Route B.

6.6.28 The mitigation for Stone Curlew birds includes a maximum of ten 2 ha nesting/foraging plots which will be created in advance of the Stone Curlew breeding season (before March). Details of plot creation and management of nesting plots is based on best practice guidance. The **Offsetting Habitat Provision for Stone Curlews Specification** [EN010106/APP/6.6] outlines the

mitigation provision, the final detail of which will be prepared and implemented post consent through a DCO requirement. As well as the bare ground plots, approximately 108ha of predominantly arable farmland have been embedded within the Scheme for reversion to grassland, specifically managed to create a close-cropped sward, suitable for Stone Curlew. Small areas of existing acid grassland have also been retained within the Scheme design in Sunnica East Site B and these will form the basis of reverting adjacent areas in Sunnica East Site B to semi-natural grassland, characteristic of the Breckland heaths. In time this will provide a high quality habitat, offering both nesting and foraging opportunities for Stone Curlew. The disturbed plots will be retained within these established grassland areas during the operational phase of the Scheme.

- 6.6.29 Within Sunnica East Site A the offsetting area will be sown with a chalk grassland mix and managed specifically for Stone Curlew. The plots will be retained within these established grassland areas during the operational phase of the Scheme.
- 6.6.30 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] concludes that there is likely to be temporary minor adverse effects during construction of the Scheme upon unimproved and semi improved acid grassland; terrestrial invertebrate species Marshy grassland arable flora; hedgerows and breeding birds due to loss of habitat; and upon Stone Curlew; Quail, Little Ringed Plover and Hobby due to disturbance and displacement. Decommissioning impacts are predicted to be similar to those arising during the construction period, although the assessment notes that important ecological features may vary given this will occur after 40 years of operation.
- 6.6.31 During operation there is expected to be a temporary low adverse impact upon Stone Curlew birds as a result of maintenance visits at Sunnica East Site A and B which results in a negligible effect on this receptor. No other protected species or habitats of importance are affected during operation. At the decommissioning stage it is expected that the habitat created on the Sites will remain in situ due to the potential presence of protected species.
- 6.6.32 Overall, the Scheme will minimise impacts on habitats of importance and protected species in line with national and local planning policy and will provide high quality ecological habitat during the operation of the Scheme.

Ancient woodland and veteran trees

- 6.6.33 Paragraph 5.3.14 of NPS EN-1 and paragraph 5.4.13 of Draft NPS EN-1 seek to protect ancient woodland and veteran trees. The latter states that the “*Secretary of State should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location clearly outweigh the loss of the woodland habitat. Aged or ‘veteran’ trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided*”.
- 6.6.34 The NPPF at paragraph 180 part (c) also protects ancient woodland and veteran trees directing the decision maker to refuse consent unless there are exceptional circumstances. Local planning policy seeks to protect ancient woodland and aged

and veteran trees from harm unless there is an overriding need for and benefits of development that outweigh the potential harm.

- 6.6.35 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] concludes that, taking into account embedded protection measures and Scheme design to minimise the impact of construction activities causing direct loss of areas of hedgerows, it is assessed that this impact will be temporary low adverse, which results in a temporary **negligible** effect, that is not considered significant.
- 6.6.36 The High Level Tree Constraints Report in **Appendix 10B** of the Environmental Statement [EN010106/APP/6.2] and **Figure 10-3** of the Environmental Statement [EN010106/APP/6.3] identifies no ancient woodland or veteran trees within the Order limits.
- 6.6.37 Prior to construction a detailed tree survey will be undertaken to confirm the status of trees affected by the Scheme. The CEMP and LEMP, which are secured through requirements of the DCO, will include specific tree protection measures to be implemented, including fencing and construction exclusion zones. An Framework CEMP and Outline LEMP are provided in **Appendices 16C** and **10I** of the Environmental Statement [EN010106/APP/6.2] respectively.
- 6.6.38 The Scheme therefore accords with national planning policy and local planning policy with regard to the protection of ancient woodland and veteran trees.

Biodiversity Net Gain

- 6.6.39 Biodiversity net gain as part of development proposals is supported through recent policy and emerging legislation. As discussed in section 5 of this Planning Statement, a recent amendment to the emerging Environment Bill will create a process by which there will be a need for NSIPs to deliver 10% biodiversity net gain. It is expected that the Environment Bill will be legislation by the time the Application is examined. The government's 25 year plan to improve the environment published in 2018 also requires environmental net gain to be part of development.
- 6.6.40 NPS EN-1 does not specify net gain. However, paragraph 5.3.4 requires applicants to demonstrate how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. The recently updated NPPF at paragraph 180(d) expects "*opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate*".
- 6.6.41 Draft NPS EN-1 paragraph 4.5.2 states that: "*Although achieving biodiversity net gain is not an obligation for projects under the Planning Act 2008, energy NSIP proposals should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity where possible*". Should the Environment Bill with the amendment proposed that requires 10% net gain to apply to NSIPs become law, then it is assumed that the Draft NPS EN-1 will be updated to reflect that legislative position.

- 6.6.42 Although not specifically applicable to NSIPs, a number of local planning policies relevant to the Scheme require development proposals to deliver biodiversity enhancement and net gain. This includes FHCS Policy CS2 which requires “*areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures*” which include creation of new habitats and ecological networks as well Green Infrastructure enhancement. JDMPD Policy DM12 expects all developments proposals to “*provide enhancement for biodiversity commensurate with the scale of the development*” and ECLP Policy ENV7 sets a requirement for developments to “*maximise opportunities for creation, restoration, enhancement and connection of natural habitats as an integral part of development proposals*”.
- 6.6.43 In September 2020 ECDC also adopted a Natural Environment Supplementary Planning Document (SPD) and whilst not planning policy it is guidance supporting the ECLP policies. This SPD includes guidance relating to net gain expecting measurable net gains for biodiversity. This expects non housing development proposals of 5ha or more to set aside a minimum of 20% of the application site area as land for rich wildlife habitat. The ECDC Renewable Energy SPD also outlines a requirement to demonstrate net biodiversity gain as part of renewable energy proposals.
- 6.6.44 The principles of biodiversity net gain (BNG) have played a fundamental part of the design development of the Scheme with over 357 Ha identified for habitat creation and enhancement. This equates to 36% of the land area of the Order limits.
- 6.6.45 The results of the BNG assessment are summarised in the **Outline LEMP in Appendix 10I** of the Environmental Statement [EN010106/APP/6.2] which concludes the Scheme will result in an overall biodiversity net gain of approximately 83% for habitat units, 16% for hedgerow units, and 1% for river units.

Summary

- 6.6.46 The Scheme, during construction, operation and decommissioning, will avoid and mitigate any significant harm on biodiversity and, once in operation, will provide significant biodiversity net gain. The Scheme is therefore in accordance with NPS EN-1, NPS EN-3, Draft NPS EN-1, Draft NPS EN-3, the NPPF and local planning policies relating to the protection and enhancement of biodiversity. It also exceeds the requirement set out in the emerging Environment Bill, the NPPF and local planning policy for biodiversity net gain.

6.7 Flood Risk and Drainage

- 6.7.1 The majority of the land within the Order limits lies within Environment Agency Flood Zone 1 which is at low risk of fluvial flooding. Three main rivers, the River Lark, the Lee Brook and the River Snail, and one ordinary watercourse do, however, intersect with the Sites and therefore small areas of the Sites adjacent to these rivers and the watercourse lie within Environment Agency Flood Zones 2, 3a and 3b. Grid Connection Route B also crosses a number of watercourses

therefore passing through multiple areas of Flood Zones 2 and 3. The areas for the location of the extension to Burwell National Grid Substation, where the Scheme will connect into the national electricity transmission network, also lie within Environment Agency defended Flood Zone 3a although more recent mapping undertaken for the East Cambridgeshire Strategic Flood Risk Assessment in 2017 show that the majority of this area is now Flood Zone 1.

- 6.7.2 NPS EN-1, at section 5.7, and Draft NPS EN-1, at section 5.8, set out the generic impacts and considerations associated with flood risk which includes the requirement for a Flood Risk Assessment (FRA) to be submitted with the Application and guidance on what this should contain (NPS EN-1 paragraph 5.7.5). Draft NPS EN-1 paragraph 5.8.7 and Draft NPS EN-3 paragraph 2.50.7 also set out draft updated requirements for the contents of an FRA (it is noted that the Draft NPS EN-1 was published after the FRA was completed). The NPPF, which was published after NPS EN-1, but before Draft NPS EN-1, stipulates this at paragraph 160 and ECLP Policy ENV8: Flood Risk requires an FRA to be prepared.
- 6.7.3 An FRA has been carried out in accordance with the policy requirements of NPS EN-1 and taking account of the NPPF and local policy and is included at **Appendix 9C** of the Environmental Statement [EN010106/APP/6.2]. A summary of the methodology and findings of the FRA are also presented in Chapter 13 of the Environmental Statement [EN010106/APP/6.1]. The requirements set out in national policies for consultation with the Environment Agency have also been met by the Applicant, who has shared the draft FRA and reached agreement regarding methodology, assumptions and conclusions. Discussions have also taken place with the Lead Local Flood Authorities at SCC and CCC and also Swaffham Internal Drainage Board.

Sequential and Exceptions Tests

- 6.7.4 NPS EN-1 paragraphs 5.7.9, 5.7.12-5.7.13 and Draft NPS EN-1 paragraphs 5.8.11 and 5.8.15; NPPF paragraphs 165 to 166 and local planning policies explain the need for developments to apply the Sequential Test.
- 6.7.5 NPS EN-1 paragraph 5.7.13 and Draft NPS EN-1 paragraph 5.8.15 explain that preference should be given to locating development in Flood Zone 1 but acknowledges that if there is no reasonably available site then projects can be located in Flood Zone 2, or if no suitable land is available in Flood Zone 2 the land in Flood Zone 3 can be used subject to the Exception Test.
- 6.7.6 NPPF paragraph 159 states that *"inappropriate development in areas at risk of flooding should be avoided and that development should be directed away from areas at highest risk. Where development is necessary in areas of flood risk, the development should be made safe for its lifetime without increasing flood risk elsewhere"*.
- 6.7.7 As small areas of the Order limits fall within Flood Zones 2 and 3 **Section 5.3** of the **FRA (Appendix 9C** of the Environmental Statement [EN010106/APP/6.2]) sets out how the Sequential Test has been met with regard to the selection of land within the Order limits and with regard to the layout of the Scheme within the

Order limits in accordance with paragraph 5.7.23 of NPS EN-1 and paragraph 5.8.25 of Draft NPS EN-1.

- 6.7.8 Flood risk to the Order limits has been a design consideration, with the design locating vulnerable Scheme components in the lowest flood risk zones. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of Flood Zones 2 and 3 and only very small areas of solar PV panels are to be located within Flood Zone 3a with appropriate mitigation measures.
- 6.7.9 As solar PV arrays are to be located in Flood Zone 3a **Section 5.3** of the **FRA (Appendix 9C)** of the Environmental Statement **[EN010106/APP/6.2]** also demonstrates how the Scheme meets the three elements of the Exception Test required by NPS EN-1 paragraph 5.7.16. The two elements of the Exception Test that are required by Draft NPS EN-1 paragraph 5.8.18 are incorporated within the three elements of the Exception Test set out in NPS EN-1 paragraph 5.7.16. The Scheme therefore also complies with the Exception Test as set out in Draft NPS EN-1 paragraph 5.8.18.

Flood risk to and from the Scheme

- 6.7.10 NPS EN-1 paragraphs 5.7.24 and 5.7.25 require “essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur” and that “the receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding”. Draft NPS EN-1 Paragraph 5.8.11 sets out that the matters that the SoS should be satisfied of in decision making. These include: “*in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in 5.8.18)*”. NPS EN-5 paragraph 2.4.1 also expects electricity infrastructure such as substations to be resilient to flooding.
- 6.7.11 Paragraph 167 of the NPPF expects development to not increase flood risk elsewhere and stipulates various requirements for development to meet in flood risk zones. These requirements include locating the most vulnerable development in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; ensuring development is appropriately flood resistant and resilient; any residual risk can be safely managed and safe access and escape can be provided.
- 6.7.12 The **FRA at Appendix 9C** of the Environmental Statement **[EN010106/APP/6.2]** considers flood risk to and from the Scheme during construction and operation. This is also summarised in **Chapter 9: Flood Risk, Drainage and Water Resources** of the Environmental Statement **[EN/010106/APP/6.1]**. Flood risk from fluvial, surface water, groundwater and artificial sources is assessed in the FRA and mitigation that has been embedded in the design of the Scheme along with the management of the construction phase in order to address potential flood risk impacts to and from the Scheme is described.
- 6.7.13 The **FRA at Appendix 9C** of the Environmental Statement **[EN010106/APP/6.2]** concludes that with appropriate design mitigation and construction management,

flood risk to and from the operational and construction stages of the Scheme from fluvial, surface water, and sewer flooding, is likely to be low. With regard to groundwater, there is a medium risk of flooding as the FRA identifies that groundwater risk varies within the Order limits. Sunnica East Site B and Sunnica West Sites A and B are shown to be within a Source Protection Zone III, with small areas of Source Protection Zone II. Further ground investigation, groundwater monitoring and infiltration testing is proposed to confirm groundwater levels with infiltration techniques to be developed which ensure mitigation measures are put in effect to protect groundwater interaction in these areas.

- 6.7.14 In terms of flood resilience design and locating vulnerable development outside flood risk areas, through the sequential process and design iterations, all compounds and buildings for site staff, on-site substations and battery storage units have been located out of Flood Zones 2 and 3 and no development is to occur in Flood Zone 3b. The only structures within the Flood Zone 3a are solar PV panels and two solar stations. The **FRA at Appendix 9C** of the Environmental Statement **[EN010106/APP/6.2]** states at section 6.3 that this infrastructure is proposed to be raised to 0.85m above ground level to provide additional protection against flood risk. The solar PV mounting structures will have legs that sit within the floodplain but will not cause a barrier to flood flows as they are expected to be less than 100mm in diameter, and do not materially remove floodplain volume (floodplain in Flood Zone 3a). These design requirements are set out in the Design Principles which are secured in Schedule 2 to the Draft DCO. The assessment therefore concludes that there is no increased fluvial risk resulting from the panels within Flood Zone 3a.
- 6.7.15 The **FRA at Appendix 9C** of the Environmental Statement **[EN010106/APP/6.2]** explains in section 7 that sea level rise poses a potential risk to the Burwell National Grid Substation Extension. Mitigation is incorporated for this risk by setting finished floor levels 0.85m above ground level (AGL). This ensures that the Substation Extension is designed and constructed to remain operational and safe in times of flood, and to ensure there is no increase in flood risk as a result of development, including allowance for sea level rise, complying with the NPPF and NPS EN-1.
- 6.7.16 Regarding safely managing residual risk, given there are no buildings for site staff at risk of flooding on the Sites, an emergency response plan or warning system is not required during operation; however, the FRA states that access to solar PV panels would not be undertaken during flooding conditions. Substations will not be manned unless for maintenance / carrying out works and during a flood event, the affected infrastructure will not be accessed or manned until flood waters recede. For the Burwell National Grid Substation extension, section 7.2 of the FRA suggests various resistance and resilience measures that can be incorporated. It adds that given the Substation Extension will be managed by National Grid it is envisaged that it will be monitored through its operational use for weather-related risks, as National Grid is registered with the Environment Agency's flood alert system.
- 6.7.17 During construction, an Emergency Response Plan will be prepared and implemented and other measures to manage residual risks. The suggested

measures for this plan are set out in **Section 9.7 of Chapter 9: Flood Risk, Drainage and Water Resources** of the Environmental Statement **[EN/010106/APP/6.1]** and the **Framework CEMP** in **Appendix 16C** of the Environmental Statement **[EN/010106/APP/6.2]**.

Drainage

- 6.7.18 NPS EN-1 paragraph 5.7.19 explains the range of sustainable approaches to surface water drainage management and paragraph 5.7.21 requires “*surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect*”. Paragraph 5.7.22 also states that it “*may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation*”. Draft NPS EN-1 contains the same policy at paragraphs 5.8.23 and 5.8.24.
- 6.7.19 NPPF paragraph 169 states that SuDs should be incorporated into new developments which should also take account of LLFA advice; have appropriate minimum operational standards; provide multifunctional benefits; and be able to be maintained to an acceptable standard for the operational life of the development. Local planning policy including guidance set out in the Cambridgeshire Water and Flood SPD also requires the implementation of SuDS and for on-site drainage to be managed so as not to cause or exacerbate flooding elsewhere.
- 6.7.20 A Drainage Strategy (Annex F of **Appendix 9C** of the Environmental Statement **[EN010106/APP/6.2]**) has been prepared for the Scheme and proposes an onsite drainage strategy in line with NPS EN-1, Draft NPS EN-1, NPPF policy and local planning policy. The approach to drainage has been discussed with the EA, LLFA and Swaffham Internal Drainage Board.
- 6.7.21 The strategy proposes to attenuate surface water runoff from the land within the Order limits, whilst minimising flood risk to the Sites and surrounding areas. In accordance with local planning policy, runoff from the land within the Order limits will not increase surface water discharge rates. A detailed surface water strategy will be prepared post consent and is proposed to be secured by a requirement to the DCO.
- 6.7.22 The approach to drainage design has been developed to mimic natural drainage as far as practicable using SuDS, and to provide a number of other benefits to ecological habitat creation. Subject to further investigation, in which groundwater monitoring and infiltration testing is conducted, the drainage design proposes to remove any surface water runoff generated within the Order limits via infiltration techniques as rainfall mostly permeates into the ground currently. Attenuation in the form of infiltration basins and swales have been incorporated to control any increase in the rate of flow towards receiving watercourses. The rate of runoff within the Order limits will ensure no increase in runoff rate from the land to the

receiving watercourses and accommodate the 1 in 100 year return period storm event plus a 40% increase allowance for climate change. All swale features will also avoid all archaeological sites and will maintain a minimum 10m buffer to watercourses and sensitive sites.

- 6.7.23 Individual solar PV panels will be held above the ground surface on solar PV mounting structures which will have struts. These will therefore avoid sealing the ground with impermeable surfaces. As a result, it is assumed the permeability of the Sites would remain consistent with their pre-development state.
- 6.7.24 The Drainage Strategy assumes 100% of the total area would be impermeable at the compound areas and substations and 100% for the BESS. Increases to existing runoff as a result of hardstanding are proposed to be balanced by swales and infiltration basins to encourage natural infiltration.
- 6.7.25 Construction will ensure no runoff is washed off site into watercourses by silt trapping methods and other measures which will be identified in a CEMP to be secured by a requirement in Schedule 2 to the draft DCO. Suggested measures at this stage are set out in the **Appendix 16C** of the Environmental Statement **[EN010106/APP/6.2]**. No infrastructure during construction will be located within 8m of a main river or flood defence structure.
- 6.7.26 In summary, the design of the Scheme and management of its construction is considered to accord with NPS EN-1, Draft NPS EN-1, NPS EN-5 and the NPPF with regard to flood risk and drainage. It is also in accordance with local planning policies as set out in **Appendix B**.

6.8 Water Quality and Resources

- 6.8.1 The Order limits interact with, or are in close proximity, to a number of water resources. The rivers potentially affected by the Scheme include the River Kennett; Lee Brook; River Lark; River Snail; New River; and Burwell Lode (part of the River Cam). In terms of underlying geology, the Order limits are underlain by solid geology of the Chalk Formation, classified as a Principal Aquifer, locally overlaid by superficial deposits of the Alluvium, River Terrace Deposits, Lowestoft Formation and Blown Sand, classified as Secondary Aquifers. The land within the Order limits is located within Source Protection Zones (SPZs) III, with a small portion of the Order limits in the north-western corner of Sunnica West A and the Grid Connection Route B designated SPZ II by the Environment Agency (EA) for the protection of potable water supply.
- 6.8.2 NPS EN-1, paragraphs 5.15.2 and 5.15.3, and Draft NPS EN-1 paragraphs 5.16.2 and 5.16.5 require Applicants to undertake an assessment of the likely effects of energy NSIPs on the water environment with specific focus on the impacts upon *“water quality, water resources and physical characteristics of the water environment”* as well as *“any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions”*. Paragraph 5.15.5 of NPS EN-1 and paragraph 5.16.7 of Draft NPS EN-1 direct the Secretary of State to give more weight to adverse effects of projects on achieving WFD objectives

and expects projects to have had regard to River Basin Management Plans (RBMP).

- 6.8.3 Paragraph 174 part (e) of the NPPF expects developments to not result in unacceptable levels of water pollution and wherever possible improve water quality, taking into consideration river basin management plans. At the local level policy JDMPD Policy DM14 and ECLP ENV9 expects developments to protect water quality and minimise pollution. These policies refuse development where it would lead to unacceptable impacts on surface and groundwater quality except in exceptional cases where social and economic need and environmental effects substantially outweigh adverse impacts of pollution.
- 6.8.4 **Chapter 9: Flood Risk, Drainage and Water Resources** of the Environmental Statement [EN/010106/APP/6.1] presents the existing status of, and effects on, the water environment during the construction, operation and decommissioning of the Scheme. This concludes that with appropriate mitigation there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment as a result of the Scheme.
- 6.8.5 The assessment identifies that there is potential for very low impacts as a result of the construction and decommissioning activities on high value water resources such as the River Kennett, Lee Brook, River Lark and River Snail at the Sites which could result in minor and negligible effects upon these resources. During construction, all works would however be carried out in accordance with the mitigation measures set out in a CEMP to be secured as a requirement of the DCO. A **Framework CEMP** is provided at **Appendix 16C** of the Environmental Statement [EN010106/APP/6.2] and outlines mitigation measures. The variety of measures proposed are discussed in **Section 9.7 of Chapter 9: Flood Risk, Drainage and Water Resources** of the Environmental Statement [EN/010106/APP/6.1]. A Water Management Plan (WMP) is also proposed to support the CEMP and is secured by a requirement of the DCO. This will provide greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction. During decommissioning all works would be carried out in accordance with mitigation measures set out in a DEMP to be secured as a requirement of the DCO. A **Framework DEMP** is provided at **Appendix 16E** of the Environmental Statement [EN010106/APP/6.2] and outlines the possible mitigation measures
- 6.8.6 During operation, neutral effects are expected upon hydrology and water quality in watercourses as a result of run-off and spillages. This is achieved through the implementation of good industry practice and complying with environmental legislation through the application of an OEMP (the Framework OEMP is included in **Appendix 16F** of the Environmental Statement [EN010106/APP/6.2]) The design of the Scheme has also included measures to avoid and minimise the risk of water pollution during its operation. These include the implementation of a drainage strategy, which would be secured by a DCO requirement; siting the BESS away from watercourses (secured through the location of the BESS shown as Work No. 2 on the Works Plans and through the Design Principles, both of which are secured in requirements in Schedule 2 to the draft DCO) and providing

enclosed drainage systems for these compounds in case of a fire event (again secured through the detailed design requirement in the draft DCO).

- 6.8.7 Minor beneficial effects upon groundwater resources are expected across the Sites during operation of the Scheme as there will be less nitrate contribution from infiltrated rainwater due to the cessation of agricultural activities at the Sites.
- 6.8.8 **Appendix 9B** of the Environmental Statement [EN010106/APP/6.2] provides a Water Framework Directive (WFD) Assessment. The Scheme interacts with seven WFD water bodies. In accordance with NPS EN-1 and Draft NPS EN-1 the WFD Assessment considers the compliance of the Scheme against the WFD objectives for those WFD water features which are within or close to the Order limits and that may be impacted.
- 6.8.9 It assesses the impact of relevant aspects of the Scheme such as the cable route crossings and proposed culverts for access on relevant WFD quality elements of each WFD water body. It also takes into account any impact on improvement measures that the Environment Agency has already proposed for waterbodies that are not already at Good Ecological Status / Potential or better and considers where there are opportunities for environmental enhancement that could support improving water body status. The WFD assessment provides accompanying information about the water bodies, and assesses the impact of the Scheme on the Anglian District RBMP objectives in accordance with NPS EN-1.
- 6.8.10 Subject to mitigation, as discussed in paragraph 6.8.7 above, the assessment concludes that the Scheme is not expected to impact on the WFD status or objectives of any associated surface water or groundwater bodies within the Scheme's zone of influence.
- 6.8.11 Furthermore, the Scheme will not prevent the achievement of the wider WFD objectives in the Anglian RBMP and is not predicted to have an impact on any other water body within the Anglian River Basin District or mitigation measures developed to achieve good status.
- 6.8.12 The Applicant is also committed to providing enhancement of WFD watercourses within the Order limits as part of the Scheme to support future attainment of WFD objectives. A WFD Mitigation and Enhancement Strategy is proposed which will include measures for the reinstatement of the bed, banks and riparian habitat impacted by each intrusive watercourse crossing technique required for the Grid Connections Routes A and B.
- 6.8.13 Overall, the Scheme design and proposed management of the various stages of its lifecycle will ensure impacts upon water resources are minimised and are therefore considered acceptable. Beneficial effects upon groundwater resources are expected as a result of the cessation of the existing agricultural activities at the Sites.
- 6.8.14 The Scheme will not prevent the achievement of WFD objectives or wider objectives of the Anglian RBMP. Where possible the Applicant is also committed to providing enhancement of WFD watercourses following the construction of the cable routes. It is therefore considered that the Scheme complies with NPS EN-1,

Draft NPS EN-1 and the NPPF in relation to the protection of water resources and achievement of WFD objectives. It is also in accordance with local planning policies as set out in **Appendix B**.

6.9 Transport and Access

- 6.9.1 The Scheme is located in a predominantly rural area, although in close proximity to the Strategic Highway Network (SHN) with the A11 running east of the Sites and the A14 to the south. There is also a network of local roads between the Sites which connect the local villages which are lightly trafficked. There are limited footways and pedestrian and cycle facilities in the area however there are several PRow crossings of the Sites and Grid Connection Route A and Grid Connection Route B, which are illustrated in **Figure 13-2** of the Environmental Statement **[EN010106/APP/6.3]**. Three PRowS (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B there is PRow (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west and an unclassified road (U6006), which is a publicly accessible route including for equestrians, and which extends northwards from Elms Road to Worlington.
- 6.9.2 The Grid Connection Route A and Grid Connection Route B are predominantly located on agricultural land but have local road access points along the routes. Grid Connection Route B also passes under the A142. Any minor road or track for vehicular traffic affected by Grid Connection Route A or Grid Connection Route B would be closed for a maximum of seven days for the cable route construction. The potential locations for the Burwell National Grid Substation Extension are served by local roads which connect these locations with the village of Burwell and onto the B1102 and B1103.
- 6.9.3 **Figures 13-4 to 13-9** of the Environmental Statement **[EN010106/APP/6.3]** illustrate the proposed accesses across the Order limits during construction, operation and decommissioning of the Scheme.
- 6.9.4 Section 5.13 of NPS EN-1 and section 5.14 of Draft NPS EN-1 discuss the requirements for considering the potential transport and traffic related impacts and mitigation of NSIPs. Paragraphs 5.13.2 of NPS EN-1 and 5.14.2 of Draft NPS EN-1 explain the mitigation of such impacts is *“an essential part of Government’s wider policy objectives for sustainable development”*. Section 2.54 of Draft NPS EN-3 sets out that solar NSIP developments should consider the suitability of potential access routes, since solar farms are often located in areas served by the minor roads network. The NPPF, at paragraph 104, also expects consideration and mitigation of transport impacts of development including the environmental impacts and impacts on transport networks. At paragraph 111, the NPPF also expects development to only be *“prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.
- 6.9.5 Both NPS EN-1, Draft NPS EN-1, and the NPPF require a transport assessment and travel plans to manage demand where development is likely to have

significant transport implications. This is also expected by local planning policies ECLP Policy COM7 and JDMPD policy DM45 to support development applications. Consultation with Highways England and the Local Highways Authorities is expected for the assessment and for the development of mitigation where relevant.

- 6.9.6 In response to these policies the Applicant has considered the likely traffic generation from the Scheme and identified the need to assess the implications of its construction phase traffic due to the volume and types of vehicles proposed to be used during this two year period. Consultation has been undertaken with SCC and CCC highway officers and with National Highways (formerly Highways England), given the proximity and proposed use of the SRN, to seek agreement of the assessment approach and mitigation measures.
- 6.9.7 During operation, it is anticipated that there will be up to 17 permanent staff on-site during the operational phase during a single shift, with operational staff working on a three-shift pattern. There will also be a requirement for additional staff to attend the Sites when required for maintenance and cleaning activities. If all the 17 permanent operational staff drove daily to the Scheme this would result in an additional 17 vehicles on the highway network. It is noted that there is the potential for share sharing for operational staff which would reduce the number of vehicles on the highway network during the operational phase, and with an average vehicle occupancy of 1.5 persons, approximately 11 vehicles would be travelling to and from the Order limits daily. Given the low number of vehicles this is not considered to have a material impact on the local highway network and was scoped out of assessment by the EIA in accordance with the Scoping Opinion issued by PINS. For decommissioning, given this would be 40 years into the future, the decommissioning phase cannot be accurately assessed. It is not anticipated at this point in time though that the impacts associated with decommissioning would be worse than during the construction period. A **Framework DEMP** has been prepared and is presented in **Appendix 16E** of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. A detailed DEMP will be required to be prepared in accordance with the Framework DEMP and approved prior to the decommissioning phase commencing.
- 6.9.8 Section 3, Table 3-3 of this Planning Statement outlines the expected construction traffic movements for the Scheme. **Chapter 13: Transport and Access** of the Environmental Statement [EN010106/APP/6.1] has assessed the impacts of these movements in terms of severance; driver delay; pedestrian delay; pedestrian and cyclist amenity; fear and intimidation; road accidents and safety; and hazardous loads during construction of the Scheme. A **Transport Assessment** is provided at **Appendix 13B** of the Environmental Statement [EN010106/APP/6.2] which assesses the impact of the Scheme on the strategic and local highway network in 2023, which is the earliest that construction is expected to commence, as well as upon highway safety.
- 6.9.9 With regard to access, NPS EN-1 and Draft NPS EN-1 expect developments to include *“proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to*

mitigate transport impacts” (paragraphs 5.13.4 and 5.14.4, respectively). Section 2.54 of NPS EN-3 sets out that access routes to a solar farm site should be able to accommodate traffic required for its construction and that the effects of traffic should be assessed. Paragraph 2.54.10 acknowledges that it is very unlikely that operational traffic and transport impacts of a solar NSIP would prevent it gaining approval. JDMPD policy DM44 protects PRoW, expecting alternative provision or diversions if loss or alteration is proposed. It also seeks to secure improvements including access to the countryside as part of new development. Impacts upon non motorised users (NMU) and public transport are assessed in both **Chapter 13: Transport and Access** of the Environmental Statement [EN010106/APP/6.1] and the **Transport Assessment (Appendix 13B** of the Environmental Statement [EN010106/APP/6.2]).

- 6.9.10 The assessment presented in **Chapter 13: Transport and Access** of the Environmental Statement [EN010106/APP/6.1] concludes that the expected impacts of the construction of the Scheme are the temporary closure of PRoW and increase in traffic flows, particularly from HGVs. Considering this in terms of construction vehicle movements at the Sites; along Grid Connection Route A and Grid Connection Route B; and at the locations for the Burwell National Grid Substation Extension, along with the mitigation proposed, the assessment concludes that the Scheme is likely to have minor adverse effects upon NMUs. This is in relation to severance, pedestrian delay and amenity, given the temporary impact of the PRoW closures. There is predicted to be very low effects in terms of accidents and safety for both motorised and NMUs users and very low effects on bus service delays, given the increase in traffic the Scheme generates on the surrounding road network.
- 6.9.11 Fear and intimidation for NMUs is slightly increased due to the increase in HGVs during construction. However, the increase is considered low and so minor adverse effects are predicted. In terms of driver delay because of increases in traffic on the surrounding road network, there is predicted to be minor adverse to negligible effects with the most affected roads being those serving the access points for the Order limits. No bus services are expected to be affected by the closure of roads during construction.
- 6.9.12 The **Transport Assessment (Appendix 13B** of the Environmental Statement [EN010106/APP/6.2]) considers the capacity of the network to safely accommodate the proposed construction traffic and concludes that the construction of the Scheme is not considered to have a significant impact on the strategic or local highway networks when considering the proposed mitigation measures to be implemented.
- 6.9.13 The mitigation proposed for minimising the adverse impacts of construction traffic upon the road network, NMUs and public transport includes measures for the management of HGVs, staff vehicles and public rights of way. These measures are set out in **section 13.7 of Chapter 13: Transport and Access** of the Environmental Statement [EN010106/APP/6.1] and section 7 of the **Transport Assessment (Appendix 13B** of the Environmental Statement [EN010106/APP/6.2]), and section 7 of the **Framework Construction Traffic**

Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.1]). These principally include:

- a. ensuring HGV movements and where possible staff vehicle movements avoid the AM and PM highway peak hours;
- b. routing HGV deliveries, including abnormal loads and cranes, onto the SRN (A11 / A14) and directing staff to use the SRN (A11, A14 and also the A142) for as much as their journey to and from the two central cars parks as possible;
- c. ensuring there is sufficient space within the Sites to avoid any HGVs queuing/parking on the local road network and implementing traffic management relating to the site accesses including the temporary traffic signals and temporary speed limit reductions required to operate the accesses safely;
- d. implementation of a construction staff parking strategy with two centralised car parking areas managed to ensure the efficient arrival of staff and assignment of the car parking spaces; a one-way system and appropriate signage; a car parking permit system; and encouraging construction staff to car share;
- e. provision of a mini bus service to transport construction staff from the two main car parks around the Sites making use of internal routes where possible;
- f. once staff origin locations are known, investigating the possibility of pick up/drop off of staff via mini bus who live locally or arrive via local railway stations to decrease staff vehicle movements;
- g. temporary closures of PRoW will be supported by appropriate signage and with diversion routes identified and signs indicating those routes provided for all users; and
- h. avoiding closures of PRoW where possible however if required they would be closed for the shortest timeframe reasonably necessary for the works. It is expected in the majority of cases that the PRoWs would be closed for a maximum of three weeks.

6.9.14 The above measures are to be secured via a Construction Traffic Management Plan (CTMP) incorporating a Travel Plan (TP) which is proposed to be secured by a requirement of the DCO. A Framework CTMP and TP document is provided at **Appendix 13C** of the Environmental Statement [EN010106/APP/6.2]. This mechanism and the scope of these plans have been discussed with the local highway authorities and National Highways.

6.9.15 The Scheme also proposes to create three new permissive routes across the Sites. These are discussed at section 4.7 of this Planning Statement and illustrated on Figures 3-1 and 3-2. These permissive routes will enable increased public access across the landscape of the local area and thus respond positively to local Green Infrastructure Strategies and local planning policies relating to rights of way.

- 6.9.16 NPS EN-1 paragraph 5.13.10 and Draft NPS EN-1 paragraph 5.14.11 also require applicants to consider the use of water-borne or rail transport over road transport at all stages of the project, where cost-effective. In response to this specific policy, the location of the Order limits means that waterborne and rail transport are not considered feasible to transport equipment and materials. Following further investigation, the construction staff mini bus service may incorporate pick up and drop off from local railway stations and local residential areas to bring construction staff to and from the site.
- 6.9.17 In summary, the traffic generated by the Scheme is not expected to result in any significant adverse environmental effects upon strategic and local highway network users; NMUs and public transport during construction, considering the proposed mitigation. It is also not expected to have a significant impact on the strategic or local highway networks in terms of their capacity and highway safety when considering the proposed mitigation measures to be implemented. Adverse effects resulting from the closure of PRowS are short term and will be managed appropriately with diversion routes provided. The provision of new permissive paths across the Sites will also provide a benefit to local recreational users by increasing public access across the landscape of the local area. The Scheme is therefore in accordance with the transport and access policies of NPS EN-1, Draft NPS EN-1 Draft NPS EN-3 and the NPPF. It is also in accordance with local planning policy, as set out in **Appendix B**.

6.10 Noise and Vibration

- 6.10.1 The nearest noise sensitive receptors to the Scheme are discussed in section 2 of this Planning Statement and include residential receptors at Isleham, Freckenham, Worlington, Chippenham, Kennett and Red Lodge within 500m of the Sites; two residential receptors within 100m of Grid Connection Route B; and residential receptors east of the options for the Burwell National Grid Substation Extension. There are also ecological and heritage receptors within and close to the Order limits.
- 6.10.2 NPS EN-1 paragraph 5.11.4 and Draft NPS EN-1 paragraph 5.12.4 require a noise assessment to be prepared where noise and vibration impacts are likely to arise and sets out the methodology for this assessment. Draft NPS EN-3 section 2.54 sets out that the noise and vibration impact of construction traffic should be considered. NPS EN-1 paragraph 5.11.6 and Draft NPS EN-1 paragraph 5.12.7 add that for operational noise this should be assessed using the principles of the relevant British Standards and other guidance. **Chapter 11: Noise and Vibration** of the Environmental Statement **[EN010106/APP/6.1]** provides a noise and vibration assessment. This was prepared prior to the publication of Draft NPS EN-1 and Draft NPS EN-3. It includes the results of long and short term monitoring of baseline noise levels which was undertaken in 2019 pre-COVID pandemic and so is considered representative of the noise climate under normal circumstances. An assessment of operational noise is included in Chapter 11 which has been undertaken in accordance with British Standard 4142. This predicts the propagation of noise from the noise generating components of the Scheme and quantifies the resultant noise levels at the nearest noise sensitive receptor locations.

- 6.10.3 The Applicant has also consulted Natural England with regard to ecology assessment, including the assessment of noise impacts on protected species or other wildlife in accordance with NPS EN-1. **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] presents the results of the assessment of noise impacts upon ecology receptors. Consideration of the likelihood of operational noise impacts upon heritage receptors where relevant is also presented in **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1].
- 6.10.4 NPS EN-1 paragraph 5.11.9 and Draft NPS EN-1 paragraph 5.12.10 state that the decision maker should not grant development consent unless it is satisfied that the proposals will meet the following aims:
- a. avoid significant adverse impacts on health and quality of life from noise;
 - b. mitigate and minimise other adverse impacts on health and quality of life from noise; and
 - c. where possible, contribute to improvements to health and quality of life through the effective management and control of noise.
- 6.10.5 Part (e) of NPPF paragraph 174 outlines that planning decisions should prevent *“new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of...noise pollution”*. At paragraph 185(a) it also states that decisions should *“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”*.
- 6.10.6 Local planning policies, ECLP Policy ENV9 and JDMPD policies DM2 and DM14, also seek to prevent new development from causing unacceptable impacts as a result of noise on amenity and the natural environment.
- 6.10.7 **Chapter 11: Noise and Vibration** of the Environmental Statement [EN010106/APP/6.1] has assessed the operational noise generated by the Scheme in the context of Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL) which are identified in the Noise Policy Statement for England published in 2010. SOAEL is the level at which significant adverse effects on health and quality of life occur and LOAEL is the level above which adverse effects on health and quality of life can be detected. SOAEL and LOAEL are further defined in **Appendix 11A** of the Environmental Statement [EN010106/APP/6.2]
- 6.10.8 The operational noise assessment concludes that exceedances of the SOAEL are not predicted at any of the sensitive residential receptors identified. Operational noise levels at residential receptors in close proximity of the Burwell National Grid Substation extension areas are predicted to be 32 decibels (dB) during the daytime and 35dB during the night, which is below background levels during the day but exceeds the night-time background noise level by 6dB. However, this night time prediction is outside the property and the assessment concludes that it would be assumed that residents will be inside at night therefore the predicted

internal noise level is, at highest, 25dB. This would be below the background noise levels experienced at this receptor and not therefore likely to have any adverse impact on health or quality of life.

6.10.9 **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement [EN010106/APP/6.1] concludes that there are no pathways during operation of the Scheme which could affect ecological receptors with regard to operational noise.

6.10.10 NPS EN-1 and NPS EN-3 also expect energy NSIPs to demonstrate good design with regard to mitigating noise impacts. Specifically NPS EN-1 paragraph 5.11.8 expects projects to *“demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.”* Draft NPS EN-1 at paragraph 5.12.9 contains the same policy.

6.10.11 The detailed design of the Scheme will be undertaken post consent however the operational noise assessment has considered the potential siting of plant in accordance with the parameters set by the **Works Plans [EN010106/APP/2.2]** and the Design Principles, both of which are secured in the draft DCO. Given the results of the operational noise assessment no noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features.

6.10.12 **Chapter 11: Noise and Vibration** of the Environmental Statement [EN010106/APP/6.1] also includes an assessment of construction noise and vibration generated by the Scheme in terms of traffic and the use of plant and heavy ground works such as piling. For decommissioning the assessment assumes the same effects as construction.

6.10.13 The assessment concludes there would be mainly negligible effects upon receptors resulting from construction noise and vibration and construction traffic. These effects would be temporary and short term (with the exception of works at Burwell National Grid Substation having a duration of 24 weeks) reflecting the multiple phases and locations of the construction and decommissioning works. Residential properties closest to the works at Worlington and along Ness Road close to Grid Connection Route B may experience low adverse magnitude impacts from construction vibration, equivalent to a minor adverse effect. This would not equate to any risk of cosmetic or structural damage to properties and no excesses of the SOAEL are expected. These conclusions also apply to the decommissioning phase.

6.10.14 Measures to control noise and vibration in accordance with relevant British Standards are to be adopted, where reasonably practicable. These measures represent Best Practicable Means which are outlined in section 11.7 of the **Chapter 11 [EN010106/APP/6.1]** and defined in **Appendix 11A** of the Environmental Statement [EN010106/APP/6.2]. A detailed CEMP incorporating these measures will be prepared prior to construction. The CEMP will be secured by a requirement in the DCO and will be in accordance with the **Framework**

CEMP included in **Appendix 16C** of the Environmental Statement **[EN010106/APP/6.2]**. A detailed DEMP will also be prepared prior to decommissioning. The DEMP will be secured by a requirement in the DCO and will be in accordance with the **Framework DEMP** included in **Appendix 16E** of the Environmental Statement **[EN010106/APP/6.2]**.

- 6.10.15 In summary, the Scheme accords with NPS EN-1 and Draft NPS EN-1, specifically the three policy aims of paragraph 5.11.9 (and 5.12.10 in Draft NPS E-1); the NPPF and local planning policies by avoiding significant noise and vibration impacts on health and quality of life; minimising adverse impacts of noise and vibration during the various phases of the Scheme through appropriate mitigation; and providing additional mitigation through the design and selection of operational plant to effectively manage and control operational noise.

6.11 Socio-Economic and Human Health Effects

- 6.11.1 Section 5.12 of NPS EN-1 and section 5.13 of Draft NPS EN-1 set out the requirements of the assessment of local and regional socio-economic impacts of energy NSIPs.
- 6.11.2 Section 4.13 of NPS EN-1 and section 4.3 of Draft NPS EN-1 discuss the potential health impacts of Energy NSIPs and expects applicants to present in their ES an assessment of health effects for each project stage and identifying measures to avoid, reduce or compensate for these impacts as appropriate.
- 6.11.3 The NPPF (paragraphs 81, 84, 92, 93 and 100) and local planning policies support sustainable economic growth; the achievement of healthy, inclusive and safe places; and the protection of existing land uses and community infrastructure including rights of way.
- 6.11.4 **Chapter 12: Socio Economics and Land Use** of the Environmental Statement **[EN010106/APP/6.1]** provides an assessment of socio economic effects including upon employment, the local economy, development land, public rights of way and existing uses close to the Scheme, during the various phases of the Scheme, in accordance with NPS EN-1 paragraph 5.12.3 and Draft NPS EN-1 paragraph 5.13.3. Effects upon tourism are not considered relevant to the Scheme and have not been assessed.
- 6.11.5 In accordance with NPS EN-1 section 4.13 and Draft NPS EN-1 section 4.3, the Applicant has undertaken a Human Health and Wellbeing Impact Assessment of the Scheme which is presented at **Chapter 15** of the Environmental Statement **[EN010106/APP/6.1]**. This has assessed the principal health benefits and disbenefits to residents of the local community of the Scheme
- 6.11.6 The socio economic and human health effects of the Scheme are discussed in the following sections.

Effects on employment and the local economy

- 6.11.7 **Chapter 12 Socio Economics and Land Use** of the Environmental Statement **[EN010106/APP/6.1]** presents the impacts on employment and its effects on the

local economy of the Scheme during construction, operation and decommissioning. The assessment concludes that the Scheme will have beneficial effects in terms of employment during the various stages of the Scheme.

- 6.11.8 On average, taking into account factors which influence employment levels⁵, 1,685 total net jobs per annum are expected to be provided during the two year construction period. Of these, 1,483 jobs per annum will be expected to be taken-up by residents within a 45 minute driving time of the Order limits, whilst 202 jobs will likely be taken up by workers living outside this area. The impact of construction employment is considered in the assessment with regard to the labour pool of construction workers in the area and determined to be a significant beneficial effect on the local economy during two years of construction.
- 6.11.9 The gross value added (GVA) to the economy of these workers is expected to be £58 million, of which £51 million will be of benefit to the local economy within the 45 minute driving time of the Order limits.
- 6.11.10 A beneficial effect is also predicted during decommissioning although it is acknowledged not as many workers are required as construction with, on average, 242 total net jobs per annum during the decommissioning period. Of these, 212 jobs per annum will be expected to be taken-up by residents within 45 minutes driving time of the Order limits, whilst the remaining 30 jobs will likely be taken up by workers living outside this area.
- 6.11.11 **Chapter 15: Human Health** of the Environmental Statement [EN010106/APP/6.1] identifies that during the construction and decommissioning periods the Scheme is expected to lead to a positive health impact on access to work and training opportunities as a result of the local employment created.
- 6.11.12 To secure the socio economic and health benefits to the local workforce during construction, the Applicant is committing to preparing and implementing a Skills, Supply Chain and Employment Plan for the construction of the Scheme which will include provision of employment opportunities for local people. This is proposed to be a requirement in of the DCO. An Outline Skills, Supply Chain and Employment Plan accompanies the Application [EN010106/APP/7.8].
- 6.11.13 During the operation of the Scheme, ongoing maintenance of the infrastructure will be required. This will require up to 17 permanent operational staff on the Sites during the operational phase during a single shift, with staff working on a three shift pattern. **Chapter 12 Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] identifies that, taking into account factors which influence employment levels it is estimated that the Scheme will result in a net creation of an estimated 30 jobs, of which at least 26 are within 45 minute driving

⁵ This includes displacing workers from other positions in the local economy; indirect and induced effects of activities in a particular phase through the supply chain and manufacturing, as well as workers and suppliers spending money in the 45 minute driving time of the Order limits generating further employment (multiplier effect).

time of the Order limits. The assessment reduces this to 29 jobs as a result of the net loss of one agricultural job due the cessation of agricultural activities at the Sites. Given the number of jobs relative to the labour pool the assessment concludes this would result in a very low beneficial socio economic effect which is considered to be a permanent negligible effect which is also not considered significant.

Public rights of way

- 6.11.14 As discussed in section 6.9, there are limited footways and pedestrian and cycle facilities in the area however there are several PRow crossings of the Sites as well as Grid Connection Route A and Grid Connection Route B.
- 6.11.15 **Chapter 12 Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] concludes that users of PRow W-257/007/0 and W-257/002/X (which are located within Sunnica East Site A) would experience temporary disruption to their journeys between Freckenham and Isleham due to these conjoining routes being temporarily severed, preventing access. This would be during construction and possibly during decommissioning only. Users would be able to use an alternative route via Beck Road (approximately 1km in additional journey length) but this route is also used by traffic. Taking a worst case, it is assumed that the PRow would be temporarily closed or diverted for a maximum of three weeks during construction. The assessment concludes this would be a temporary moderate adverse socio economic effect which is significant. Effects on users of other PRow closed during construction and decommissioning are likely to be minor adverse or negligible socio economic effects.
- 6.11.16 **Chapter 15: Human Health** of the Environmental Statement [EN010106/APP/6.1] also identifies that the Scheme may result in temporary adverse health impacts associated with the construction and decommissioning of the Scheme due to the closure of PRow and for decommissioning the removal of permissive paths created during operation.
- 6.11.17 The operational phase will see the creation of three permissive paths, the details of which are discussed in section 4.7 of this Planning Statement. **Chapter 12 Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] assesses the introduction of these over the 40 year operational period and concludes that there would be minor beneficial effects resulting from the provision of three safe new routes for the use of local residents in the area.
- 6.11.18 Positive health impacts are concluded in **Chapter 15: Human Health** of the Environmental Statement [EN010106/APP/6.1] with regard to accessibility and active travel and social cohesion as a result of the creation of the new permissive paths.

Impacts on local amenities and land use including development land

- 6.11.19 The Scheme is located within 1km of a number of villages which have public houses, recreational facilities such as sports clubs/golf courses and a number of churches and community facilities. Development land allocations within and

adjacent to the Order limits that might be affected are discussed in section 2 of this Planning Statement. Impacts on residential and business properties; community facilities and development land have been assessed in **Chapter 12 Socio Economics and Land Use** of the Environmental Statement **[EN010106/APP/6.1]** during construction, operation and decommissioning. This assessment concludes that there will be no socio economic effects on these receptors.

6.11.20 Regarding access to healthcare services and other social infrastructure, **Chapter 15: Human Health** of the Environmental Statement **[EN010106/APP/6.1]** concludes there is not likely to be any severance between local residents and the healthcare facilities and other social infrastructure which are used during the construction, operation, or decommissioning phases of the Scheme and therefore no negative effects are expected. The assessment also considers the minor adverse noise effects for some residents at Burwell during construction, operation and decommissioning, identified in **Chapter 11: Noise and Vibration** of the Environmental Statement **[EN010106/APP/6.1]**. The assessment concludes that these effects would have a negative effect on amenity during operation due to the effects lasting for 40 years. As discussed in section 6.10, the Applicant is committed to designing and selecting plant which will minimise tonal, impulsive or intermittent features and therefore it is anticipated that this could mitigate these effects further.

6.11.21 Other land use impacts are discussed in section 6.12 and 6.13 below

Summary

6.11.22 There are beneficial socio economic effects of the Scheme and positive effects on human health as a result of the significant employment created during construction, and to a lesser extent during decommissioning, as well as the creation of three new permissive paths during operation. It is acknowledged that the temporary closure or diversions of PRoW within the Order limits during construction results in adverse socio economic effects and negative impacts on human health, however these effects are very short term, with a maximum duration of three weeks. On balance the Scheme is considered to generally accord with NPS EN-1, Draft NPS EN-1, and the NPPF which support sustainable economic growth and the protection of health, existing and future land uses and community infrastructure including rights of way. As set out in **Appendix B**, the Scheme is also broadly compliant with local planning policy, including JDMPD Policy DM44, which seeks to protect the convenience, safety and character of PRoW.

6.12 Agricultural land

6.12.1 The majority of the land within the Order limits is in agricultural use which is interspersed with individual trees, hedgerow, linear tree belts and farm access tracks. Agricultural land is classified into grades with best and most versatile land being grades 1, 2 and 3a and poorer quality agricultural land being grades 3b,4 and 5. **Appendix 12B: Soils and Agriculture Baseline Report** of the Environmental Statement **[EN010106/APP/6.2]** identifies the various grades of agricultural land across the Sites as a result of soil surveys undertaken. Table 5-2

of the report sets out the ALC Grade Distribution across the Site, it explains that 96% of the land within the Sites falls within grade 3b, 4 and 5 with some non agricultural land uses also present. The report identifies that the land is used for food production (crops such as onion, sugar beet, potato) however is heavily reliant on irrigation for volume and quality of these crops.

- 6.12.2 NPS EN-1 paragraph 5.10.8 and Draft NPS EN-1 paragraph 5.11.8 require applicants to take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Paragraph 5.10.15 of NPS EN-1 and paragraph 5.11.14 of Draft NPS EN-1 further add that siting projects on best and most versatile agricultural land requires justification and that little weight should be given by the Secretary of State to the loss of poorer quality agricultural land (in grades 3b, 4 and 5). Paragraph 5.10.3 of NPS EN-1 and paragraph 5.11.3 of Draft NPS EN-1 note that the re-use of previously developed land can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used however, it acknowledges that this may not always be possible for many forms of energy infrastructure.
- 6.12.3 Draft NPS EN-3 includes “*agriculture land classification and land type*” as one of the “*factors influencing site selection by the applicant*” for solar photovoltaic generation project in section 2.48. At paragraph 2.48.13, Draft NPS EN-3 states that: “*Solar is a highly flexible technology and as such can be deployed on a wide variety of land types. Where possible, ground mounted Solar PV projects should utilise previously developed land, brownfield land, contaminated land, industrial land, or agricultural land preferably of classification 3b, 4, and 5 (avoiding the use of “Best and Most Versatile” cropland where possible). However, land type should not be a predominating factor in determining the suitability of the site location.*” At paragraph 2.48.15 Draft NPS EN-3 acknowledges that at NSIP scale, solar generation projects are likely to use agricultural land, but that applicants should explain their choice of site, noting the preference for development to be on brownfield or non-agricultural land.
- 6.12.4 Draft NPS EN-3 paragraph 2.48.14 also states that applicants ALC surveys should extend to the underground cable route. The ALC survey for the Scheme was undertaken before Draft NPS EN-3 was published. Therefore the survey does not include the cable route. However, the ALC survey is in accordance with policy at the time it was undertaken, and in accordance with policy that is in force at the time of submission of the application. In addition, it is noted that any agricultural land required for construction of the cable route will be required only during the construction period and will therefore only be taken out of agricultural use for a short period. The approach taken to the ALC survey is therefore considered to be acceptable.
- 6.12.5 The NPPF, at paragraph 174, expects planning decisions to contribute to and enhance the natural and local environment by protecting and enhancing soils and

avoiding soil pollution and by recognising the economic and other benefits of best and most versatile agricultural land. Footnote 58 of paragraph 175 further adds that *“where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”*.

- 6.12.6 JDMPD policy DM5 allows commercial development in the countryside if, amongst other things, it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a); and the ECDC Renewable Energy SPD expects applicants to provide information regarding the loss of agricultural land for solar development and the consideration of alternatives.
- 6.12.7 In determining the location of the Scheme, the Applicant identified land within a 15km search area from the point of connection at Burwell National Grid Substation, where the Applicant identified available network capacity for the Scheme with reinforcement that could be completed within a reasonable timeframe and cost. Planning and environmental constraints have been considered to identify suitable land for large scale solar development and have involved consideration of agricultural land classification as well as previously developed land. Previously developed land of the size required for the Scheme was not identified and best and most versatile (BMV) land was avoided where possible resulting in 96% of the land area for the Sites being poorer quality agricultural land (grades 3b,4 and 5) or non agricultural land. Alternatives sites considered were also on poorer quality agricultural land. Further details of the step by step process confirming that the location of the Scheme is suitable for a large scale solar farm is provided in **Appendix 4A: Alternative Sites Assessment** of the Environmental Statement [EN010106/APP/6.2].
- 6.12.8 The land required for the Scheme within the Sites does, however, include pockets of Grade 3a BMV land at three locations, covering a total area of 37.9ha where solar PV and environmental mitigation is proposed. The largest block of Grade 3a land is found to the east of the A11 at Sunnica West Site A. Two more small areas of Grade 3a land are located within Sunnica East Site B to the north of this Site, near Worlington, and within Sunnica West Site A in the south western area of this site. The loss of this BMV land for arable use will be for the construction period and the 40 year operational lifetime of the Scheme with decommissioning returning the land back for it to be used for agriculture again at that time. **Chapter 12: Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] concludes that the land will not degrade over that period of time as the solar infrastructure installed involves little disturbance of the soil and retention of the land resource for future use. This results in negligible effects during construction and operation. Agricultural use of the land will also not be lost during the operation of the Scheme as it is proposed to graze sheep on grassland created within the Sites.
- 6.12.9 **Chapter 12: Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] identifies that for the 40 year duration of the Scheme the soil resource will remain in place and benefit from an extended fallow. The grassland cover and the suspension of cultivation will allow a return to a higher equilibrium for soil organic matter, providing a number of benefits to soil health including

fertility, moisture retention and structural stability which will benefit future agricultural productivity. The assessment concludes that there is therefore expected to be a significant moderate beneficial effect on the land during the operation of the Scheme.

- 6.12.10 Along the Grid Connection Route A and Grid Connection Route B BMV agricultural land is present but will only be temporarily disturbed for the laying of cables during the construction period. Natural England's Agricultural Land Classification – Provisional data indicates that each of the land option areas for the Burwell National Grid Substation Extension is within Grade 2 agricultural land therefore there will be a loss of BMV. The land area lost is up to approximately 3ha. This small permanent loss is justified by the fact that the Burwell National Grid Substation Extension can only be sited within close proximity of the Burwell National Grid Substation to be operationally effective.
- 6.12.11 In summary, the Scheme's location maximises the use of poorer quality agricultural land and will not result in the permanent loss of BMV land, except for a small area adjacent to Burwell Substation, due to the Scheme being decommissioned following 40 years of operation. Leaving the land fallow for 40 years will also provide benefits in terms of improving soil quality which the ES identifies is a significant beneficial effect of the Scheme. Therefore, it is considered that the Scheme accords with the NPS EN-1, Draft NPS EN-1, Draft NPS EN-3, the NPPF and local planning policies included in **Appendix B** relating to the protection and justification for using BMV agricultural land and the protection of soil resources. In terms of the scope of the ALC assessment, although this does not fully meet the Draft NPS EN-3 statement that this should include the cable route, the Applicant considers the approach it has taken to be acceptable since the impact of the Scheme on agricultural land along the cable route would only be for a short duration and the ALC assessment accords with the national policy in force at the time of submission of the application.

6.13 Other Impacts on Existing Uses, Development Plan Allocations and Safeguarded Areas

- 6.13.1 Section 2 of this Planning Statement explains the current context with regard to existing uses; development plan allocations and safeguarded areas; and unimplemented and emerging planning permissions which are within and close to the Order limits. This is discussed in **Chapter 12 Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] with regard to unimplemented planning permissions and development allocations.
- 6.13.2 Section 5.10 of NPS EN-1 and section 5.11.1 of Draft NPS EN-1 explains that energy infrastructure can have direct effects on the existing use of a proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development.
- 6.13.3 At paragraph 5.10.5 and 5.11.5, respectively, NPS EN-1 and Draft NPS EN-1 set out that applicants are expected to identify in the ES any *“existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a*

neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan”.

- 6.13.4 NPS EN-1 section 5.10 and Draft NPS EN-1 section 5.11 also set out policies relating to open spaces, recreational facilities and land as well as designated green belt. The Scheme does not include any proposals to build on designated green belt, open space, sports or recreational buildings and land and so there will be no loss or direct impacts on these types of land use.
- 6.13.5 The following sections explain the Scheme’s impact and consideration on existing uses, allocations and safeguarding areas within or close to the Order limits. Section 6.12 of this Planning Statement explains the impacts on the existing agricultural uses within the Order limits and so are not discussed further here.

Minerals and waste allocations and safeguarding areas

- 6.13.6 The Order limits lie within a number of safeguarded areas for existing minerals and waste sites as well as mineral consultation areas for mineral safeguarding of sand and gravel and chalk identified on the policies maps supporting the SMWLP and the CMWLP. These are detailed in section 2 of this Planning Statement.
- 6.13.7 With regard to mineral safeguarding, paragraph 5.10.9 of NPS EN-1 and paragraph 5.11.9 of Draft NPS EN-1 state that applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. Paragraph 5.10.22 of NPS EN-1 and paragraph 5.11.21 further add that the decision maker should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources in the event that a proposed development has an impact on a Mineral Safeguarding Area. Paragraph 206 of the NPPF states that Local Planning Authorities “*should not permit development in Mineral Safeguarding Areas if it might constrain potential future use for mineral working*”.
- 6.13.8 Local minerals and waste planning policies safeguard the minerals identified as safeguarded areas on their policies maps.
- 6.13.9 The SMWLP Policy MP10: Mineral consultation and safeguarding areas safeguard mineral resources from development states that SCC will object to development unless it can be shown that the sand and gravel present is:
- a. not of economic value, or
 - b. not practically or environmentally feasible to extract, or
 - c. that the mineral will be worked before the development takes place or used within the development.
- 6.13.10 Policy 5 of the CPMWLP adopted in July 2021 sets out the conditions where development within mineral safeguarded areas will be permitted. These include:

- a. the mineral concerned is no longer of any economic value or potential value, or
- b. the mineral can be extracted prior to the development taking place, or
- c. the development will not inhibit extraction if required in the future, or
- d. there is overriding need for the development and prior extraction cannot be reasonably undertaken, or
- e. the development is not incompatible

6.13.11 Responding to the conditions presented by these policies, the Scheme accords with condition (b) of SMWLP Policy MP10 as it is not considered practical or environmentally feasible to extract the mineral resource prior to the Scheme being constructed. This is because of the extent of the land area affected and the costs and the potential for environmental impacts associated with prior extraction. The Scheme also does not affect the ability of Worlington Quarry (see further below), which has its current operational area adjacent to Sunnica East Site B and future extraction areas further east allocated in the SMWLP, to expand its operations whilst the Scheme is operational. This position is further supported by the fact that the Scheme will not permanently sterilise the mineral resource and will be decommissioned following 40 years of operation. The decommissioning of the Scheme following 40 years of operation is proposed to be secured as a requirement of the DCO and therefore also meets condition 3 of CPMWLP policy 5. Furthermore, the Scheme meets condition 4 of CPMWLP policy 5 as there is an overriding need for the development as discussed in section 4 and section 6.2 of this Planning Statement.

6.13.12 Policy MP10 of the SMWLP also protects existing, planned or potential sites allocated for sand and gravel extraction from development that might prejudice the future extraction of minerals or be prejudiced by proposed mineral working. Policy WP18 provides a similar policy approach for existing and allocated waste sites. Similarly CPMWLP policy 16 protects Mineral Allocation Areas, Mineral Development Areas, Waste Management Areas, Transport Infrastructure Areas and Water Recycling Areas from prejudicial development through the need to consult CCC within 250m of these types of development.

6.13.13 As discussed in section 2 of this Planning Statement, the Order limits fall within the 250m consultation areas for safeguarded existing minerals and waste sites and a transport infrastructure area. In accordance with local planning policy, it is not considered that the introduction of solar PV and supporting infrastructure including substations and BESSs will affect the future extraction or operation of these sites. This is also concluded **Chapter 12: Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1].

6.13.14 In addition, a small area of Sunnica East Site B lies within 'working area 5' of the extant 2004 planning permission for the Quarry (SCC application reference: F/04/0227) which has been subject to a recent revised permission in 2015 (SCC application F/15/1386 - see section 2 and **Appendix A** of this Planning Statement). This small area was subject to geological investigation by the mineral

operator and found to be barren containing no mineral of sufficient quality or quantity to be economically viable. Its current use is agriculture which accords with the proposed and approved restoration plan for the Quarry. However, given the Quarry has approval to operate until 2025, the restoration plan has not yet been fully implemented or after care completed. Although the only land within the Quarry that will be affected by the Scheme has been identified as barren of minerals that is of sufficient volume or quality to usefully extract, the Scheme will affect the proposed restoration of the part of area 5 that coincides with the Order limits. This is the proposed location of the BESS and substation at Sunnica East Site B. The DCO therefore includes, at Article 6, provisions that means that there will be no breach of the relevant planning permission should the Scheme be constructed on land subject to that planning permission.

Horse racing industry

- 6.13.15 The horse racing industry is present within the local area, with Sunnica West Site A surrounded by grazed paddocks, horse gallops and exercise tracks. A horse training ground known as the Gallops owned by the Godolphin Management Company, extends from the north of the A14 to border Snailwell and is adjacent to the southern boundary of Sunnica West Site A. Other equestrian land uses principally border Newmarket. The British Riding School is approximately 0.9km to the south west situated between the A14 and Newmarket railway line to the northeast of Newmarket; the Limekilns owned by the Jockey Club, consisting of a triangular parcel of land between the A1304 and Well Bottom road, is approximately 450m south of Sunnica West Site A and has views of the Scheme across the A11.
- 6.13.16 ECLP policy EMP6: Development affecting the horse racing industry protects the horse racing industry from adverse impacts on their activities and long term viability. The Applicant has considered this in the design of the Scheme and has liaised closely with the Godolphin Management Company and the Jockey Club regarding the impacts of the Scheme on their operations.
- 6.13.17 **Appendix 16A** of the Environmental Statement [EN010106/APP/6.1] presents an assessment of the effects of glint and glare arising from the Scheme which is summarised in **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1]. This concludes that horse racing facilities in the vicinity of the Order limits will not experience any significant adverse effects due to visibility of any panels being screened from view by existing vegetation and landform as well as the proposed mitigation planting. Prior to the planting being established the assessment concludes that these facilities would experience a low impact in terms of glint and glare due to the location of the solar reflection and reflections coinciding with direct sunlight.
- 6.13.18 Engagement with Godolphin Management Group has led to the Applicant proposing temporary measures to minimise disturbance to horse racing uses abutting the boundary of Sunnica West Site A. Measures embedded into the design include not undertaking construction works within fields adjacent to 'The Gallops' on Sunnica West Site A prior to 10am to limit disruption to their horse training activities. This would be secured in the CEMP. Temporary fencing is also

proposed to be installed locally along the boundary of Sunnica West Site A to screen views until the establishment of the proposed planting.

Aviation uses

- 6.13.19 Potential aviation receptors of the Scheme include air traffic control towers and approaching aircraft related to two RAF bases:
- a. RAF Mildenhall, operated by the Ministry of Defence, which is the closest aerodrome to the Order limits and is located approximately 2.5km to the north-east; and
 - b. RAF Lakenheath Airfield, which is located approximately 10km to the north-east.
- 6.13.20 Paragraph 5.4.10 of NPS EN-1 and paragraph 5.5.10 of Draft NPS EN-1 state that if a development “*may have an effect on civil or military aviation and/or other defence assets, an assessment of potential effects should be set out in the ES*” with paragraphs 5.4.11 and 5.5.11 of NPS EN-1 and Draft NPS EN-1, respectively, expecting applicants to consult the Ministry of Defence (MoD), Civil Aviation Authority (CAA), NATS and any aerodrome affected. ECLP Policy ENV6: Renewable Energy Development also supports proposals for renewable energy and associated infrastructure where significant adverse effects in relation to safeguarding for nearby airfields are made acceptable.
- 6.13.21 **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] concludes that the glint and glare assessment (presented at **Appendix 16A** of the Environmental Statement [EN010106/APP/6.2]) identifies no reflections are predicted for aviation receptors at RAF Mildenhall and no effects are anticipated for receptors at RAF Lakenheath and Cambridge Airport due to their distance from the Scheme and orientation of the runways. This is consistent with Draft NPS EN-3 paragraph 2.52.5, which states that: “*There is no evidence that glint and glare from solar farms interferes in any way with aviation navigation or pilot and aircraft visibility or safety. Therefore, the Secretary of State is unlikely to have to give any weight to claims of aviation interference as a result of glint and glare from solar farms*”. Bird strike is also not considered to be a risk due to the construction and operational activities not attracting birds. Therefore, no impact is anticipated on aviation receptors. Consultation with the MoD, CAA and NATS at the scoping stage of the EIA has not identified any issues.

Road users

- 6.13.22 Road users travelling in a south-westerly direction on a section of the A14 adjacent to Sunnica West Site A will have views of the panels for approximately 200m prior to the proposed mitigation planting maturing. It has therefore been identified that these receptors may experience effects of glint and glare and are assessed in **Appendix 16A** of the Environmental Statement [EN010106/APP/6.2]. **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] presents the outcome of this assessment and concludes that, without additional mitigation, this would result in a significant major impact as it is a potential safety hazard. Mitigation will be

provided in the form of a temporary solid hoarding that will be 2m in height. The hoarding would be located on a short section, approximately 300m, along the Sunnica West Site A boundary with a high percentage of evergreen (native and non-native) species planted adjacent to the temporary hoarding in line with the indicative planting strategy shown on **Figure 3-2**.

- 6.13.23 The temporary hoarding will be removed once the density and height of vegetation is sufficient to screen the views. The detailed design of the hoarding will be developed and approved via a requirement of the DCO.

Other developments and allocations

- 6.13.24 Section 2 of this Planning Statement explains the context with regard to implemented and unimplemented planning permissions within and close to the Order limits. The Scheme is not expected to have any land use conflict with the permissions which directly interact with the Order limits. The reasons for this are set out below:
- a. Anaerobic Digestion plant at Bay Farm – this is due to the amendments to its feedstock requirements not requiring a supply of sugar beet and maize grown on land within Sunnica East Site B, Sunnica West Site A and Sunnica West Site B.
 - b. Mixed use development associated with the bioanalytical centre operated by LGC Limited - the cable route corridor for Grid Connection Route B will avoid the built development proposals and pass under the proposed car park.
 - c. Solar farm at Goosehall Farm - Discussions with the developers of this solar farm have confirmed that the cabling for the Scheme will not conflict with this proposed solar farm.
 - d. Extension of a cold storage facility with a small extension to an administrative office and vehicle parking at Fordham – the Grid Connection Route B will go under the surface water drainage feature proposed as part of this permission and therefore avoids conflict with built development. Discussions are ongoing with the operators and owners of the site Turners of Soham.
 - e. Burwell II solar farm – a proposed solar farm and ancillary development on land to the east of Breach Farm, Ness Road. Although the application is yet to be determined at the time of writing, the Applicant has reached agreement for the developers to have set back distances to avoid direct impacts with the Scheme's cable routing.
 - f. Proposed Anglian Water pipeline running between Bexwell and Bury St Edmunds – although this is not yet a planning application the Applicant has held discussions with Anglian Water regarding their proposals. This has confirmed that Anglian Water are in the early stages of their application and do not hold an option agreement/easement over the land they need to cross the Grid Connection Route A with their new pipeline. Anglian Water are aware of the Scheme and its interaction with their proposal and agreement on an easement will be discussed once their proposals are more advanced. In

addition, the draft DCO includes Protective Provisions for the benefit of Anglian Water. It is also possible that an alternative route for the Anglian Water pipeline, which avoids the Order Limits, may come forward.

- g. Construction and operation of a 49.9MW battery storage facility adjacent to the operational Burwell 400kV substation – this is within the Order limits to the south east of the existing Burwell National Grid Substation. It is not anticipated that this will be affected by any access requirements for the extension proposed as part of the Scheme.

6.13.25 Other development allocations close to the Order limits are identified in Table 2-3 of this Planning Statement.

6.13.26 The ES [EN010106/APP/6.1] sets out how the EIA has considered the likely significant cumulative environmental effects of the Scheme and other future developments.

Summary

6.13.27 It is considered that the Scheme accords with the relevant policies of NPS EN-1 section 5.10, and Draft NPS EN-1 section 5.11, as well as relevant local policies discussed above. As a result of implementing appropriate mitigation it would not generate conflict with existing or proposed land uses. Furthermore, the Scheme would avoid the permanent sterilisation of mineral resources in accordance with national and local minerals planning policy and avoid impacts upon aviation receptors in accordance with section 5.4 of NPS EN-1, section 5.5 of Draft NPS EN-1, and local planning policy.

6.14 Major accidents and disasters

6.14.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require assessment of the potential effects of the Scheme on the environment as a result of the vulnerability of the Scheme to risks of major accidents or disasters which are relevant to the Scheme.

6.14.2 As the energy NPSs were published in 2011, they pre-date the existing EIA Regulations. The NPPF does refer, at paragraph 97, to the fact that: *“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards”, and taking “appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security”*. ECLP Policy ENV9: Pollution expects developments to minimise pollution and emissions and requests development applications to provide sufficient information for an assessment of potential hazards and impacts to be undertaken. The policy directs proposals to be refused where, individually or cumulatively, there are unacceptable impacts arising from the development on the health and safety of the public with development permitted where the environmental benefits of the development and the wider social and economic need outweigh any adverse impacts of pollution. Similarly, JDMPD policy DM14 will refuse permission where unacceptable impacts on health and safety of the public and air quality are expected.

- 6.14.3 **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] considers a number of potential accidents and disasters, including fire, floods and flood defence failure, road accidents, rail accidents, aircraft disasters, utilities failure, plant disease, criminal activity and bird strike.
- 6.14.4 Minimising the risk of major accidents during construction, operation and decommissioning will be addressed through appropriate measures set out in the Framework CEMP, OEMP and DEMP (**Appendices 16C, 16F and 16E** of the Environmental Statement [EN010106/APP/6.2]). The detailed preparation and implementation of these plans are secured via requirements to the DCO.
- 6.14.5 As a result of mitigation measures **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1], the ES concludes that there will be no environmental effects of rail accidents, birdstrike, criminal damage and fire during construction and decommissioning. Other effects associated with flood, flood defence failure, road accidents, plant disease and utilities failure and aircraft disasters are also considered in other assessments in the ES. With the management measures identified in the CEMP and DEMP there is likely to be no or negligible environmental effects in relation to potential major accidents and disasters during construction and decommissioning.
- 6.14.6 Regarding the operation of the Scheme, **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] concludes no effects are expected on the environment due to the risk of a major accident occurring as a result of criminal damage or bird strike. In relation to rail accidents, the cable route corridor for Grid Connection Route B crosses the railway line connecting Newmarket to Ely. The crossing will be designed to meet the specific requirements of Network Rail (protective provisions are included in the draft DCO [EN010106/APP/3.1] for the protection of Network Rail's railway). The assessment therefore concludes that the risk of a rail accident as a result of the crossing will be minimised and significant effects on the environment due to rail accidents are not anticipated.
- 6.14.7 As discussed in section 3 of this Planning Statement, the Scheme is proposing to build three BESS, one at Sunnica East Site A, one at Sunnica East Site B and one at Sunnica West Site A. There is a potential fire risk associated with batteries during the operation of the Scheme. In response to the statutory consultation the host authorities expressed a concern that the risks associated with battery storage fires had not been fully explored. In addition, the statutory consultation also included feedback from local residents regarding their concerns about battery fires.
- 6.14.8 The Applicant recognises how important it is to demonstrate that the BESS would be safe and therefore has prepared an Outline Battery Fire Safety Management Plan (Outline BFSMP) [EN010106/APP/7.6] in consultation with the Suffolk Fire and Rescue Services (who are also representing Cambridgeshire Fire and Rescue Service) to address the issue of battery safety. The draft Outline BFSMP was also issued to the Health and Safety Executive for comment. The Outline BFSMP sets out how the Scheme proposes to mitigate and manage the potential fire risk posed by the BESS. The preparation and implementation of a detailed

BFSMP based on the Outline BFSMP is proposed to be a requirement of the DCO.

- 6.14.9 The proposed design for fire mitigation includes the BESS containers being fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally (centralised or decentralised) to each BESS. The containment of this water would be within a sump integrated into the BESS container. Each BESS area requires a bunded lagoon for use by the fire service in case of a fire in the BESS compound.
- 6.14.10 A Fire Emergency Response Plan and a Fire Service Site Specific Risk Assessment will also be produced for each BESS area. This will be secured through the OEMP, the implementation of which is secured via a requirement to the DCO. A Framework OEMP is presented in **Appendix 16F** of the Environmental Statement [EN010106/APP/6.2],
- 6.14.11 Additionally, an Unplanned Atmospheric Emissions from BESS report has been provided at **Appendix 16D** of the Environmental Statement [EN010106/APP/6.2]. This assesses the effects of a battery fire upon local air quality. Based on the outline design for the BESS, the assessment concludes that in the unlikely event that all the fire control systems fail and a large scale fire breaks out within one of the BESS containers then the resultant emissions (hydrogen fluoride) at the closest residential receptors to the BESS compounds would be below the concentration levels Public Health England regard as having notable discomfort to members of the general population.
- 6.14.12 In summary the Scheme is unlikely to pose a significant risk to the health and safety of the public from major accidents and disasters and therefore is in accordance with the NPPF and local planning policies related to public safety.

6.15 Other Construction, Operation and Decommissioning impacts

- 6.15.1 Other impacts of the Scheme during its construction, operation and decommissioning have been identified and are assessed and discussed in the ES [EN010106/APP/6.1]. These include impacts in relation to air quality during construction and decommissioning; waste management; and ground disturbance.
- 6.15.2 NPS EN-1 outlines the following with regard to these types of impacts:
- a. Section 4.10 explains the need for the Secretary of State to consider whether pollution impacts of development would not cumulatively lead to the development being unacceptable and acknowledges that pollution impacts should not be a reason for refusal unless it is likely any necessary operational pollution control permits or licences or other consents will not subsequently be granted. Draft NPS EN-1 section 4.11 sets out the same requirements, but references more recent regulations.
 - b. Section 5.2 expects applicants to undertake an assessment of air quality impacts if the project is likely to have adverse effects on air quality. Paragraph 5.2.7 stipulates what the ES should cover and paragraph 5.2.9 expects air

quality considerations to be given substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. Paragraph 5.2.11 explains mitigation measures may be needed for “*construction emissions over and above any which may form part of the project*” and that a “*construction management plan may help codify mitigation at this stage*”. Section 5.2 of Draft NPS EN-1 sets out similar requirements.

- c. Section 5.6 (and section 5.7 of Draft NPS EN-1) expects applicants to assess the potential for the Scheme to have a detrimental impact on amenity with regard to artificial light, dust, odour, smoke, steam and insect infestation and include measures to minimise any such detrimental impacts.
- d. Section 5.10 (and section 5.11 of Draft NPS EN-1) explains the need to identify effects and provide mitigation of impacts on soil quality.
- e. Section 5.14 (and section 5.15 of Draft NPS EN-1) requires projects to apply the waste hierarchy in the management of their waste with disposal being the last resort. Paragraph 5.14.6 expects applicants to “*set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan*”. It expects an assessment of the impact of the waste arising from development on the capacity of waste management facilities during operation. Applicants should aim to minimise waste volumes and confirm waste can be properly managed on and off site through all stages of the project. Draft NPS EN-1 sets out similar requirements and encourages applicants to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. It also encourages applicants use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste.

- 6.15.3 Paragraph 174 part (c) of the NPPF expects developments to not result in unacceptable levels of soil, air or noise pollution and wherever possible improve local environmental conditions. Paragraph 183 expects ground conditions and risks of contamination to be considered in development decisions. Paragraph 186 requires development to contribute to the compliance with relevant limit values or national objectives for pollutants and mitigate any impacts through measures such as through traffic and travel management, and green infrastructure provision and enhancement
- 6.15.4 At the local level policy JDMPD Policy DM14 and ECLP ENV9 expect developments to minimise pollution and ensure no deterioration in air quality. These policies refuse development where it would lead to unacceptable impacts in relation to noise and light pollution, general amenity and land quality except in exceptional cases where social and economic need and environmental effects substantially outweigh adverse impacts of pollution.
- 6.15.5 The following sections summarise the likely impacts and proposed mitigation and compliance with relevant planning policy are then discussed. Assessment of impacts on amenity in relation odour, smoke, steam and insect infestation required by NPS EN-1 section 5.6 are not considered relevant, given the nature of the Scheme. A **Statutory Nuisance Statement** accompanies the Application

[EN010106/APP/7.5] which sets out further details in respect of statutory nuisance matters relevant to the Scheme and the measures that have been incorporated into the Scheme to limit any such potential nuisances.

Air quality

- 6.15.6 **Chapter 14: Air Quality** of the Environmental Statement [EN010106/APP/6.1] assesses the impacts of the construction and decommissioning of the Scheme on local air quality.
- 6.15.7 The assessment considers dust generation by undertaking a dust risk assessment as required by NPS EN-1 paragraph 5.6.4. This assessment also considers ecological receptors in addition to local amenity.
- 6.15.8 Additional road traffic and plant emissions during the construction phase have also been assessed. The assessment refers to the decommissioning phase explaining it will be similar in nature, duration, and extent to the construction phase and so effects of the construction phase are to be similar for decommissioning.
- 6.15.9 The dust risk assessment concludes that, following implementation of measures for the management of dust (which are set out in Table 14-12 of **Chapter 14** of the Environmental Statement [EN010106/APP/6.1]) the effect on ecological receptors, dust deposition, and on human health is anticipated to be not significant.
- 6.15.10 With regard to additional road traffic emissions on local air quality, the assessment confirms there is likely to be no significant impact on local air quality during construction given the volume of traffic proposed and the predicted pollutant concentrations at sensitive receptors, which includes Red Lodge Heath SSSI, close to the potential construction traffic route.
- 6.15.11 Overall, effects on air quality are anticipated to be negligible and not significant subject to the implementation of mitigation.

Waste Management

- 6.15.12 **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] assesses the impacts of waste arising from the Scheme. This concludes that, given the nature of the Scheme, significant quantities of waste are not anticipated and significant adverse environmental effects are not expected resulting from the impacts of waste from the Scheme. Table 16-12 within ES **Chapter 16: Other Environmental Topics** [EN010106/APP/6.1] identifies the hazardous and non hazardous waste arisings expected.
- 6.15.13 Given the quantities, waste will be transported off-site and delivered to the appropriately licenced receivers of such materials. This includes hazardous wastes which will require an authorised carrier. Operators receiving any waste materials resulting from the Scheme will be subject to their own consenting procedures. During operation there will be minimal waste arisings from the

offices/warehouses and maintenance activities and this would be managed through the operational management of the Scheme.

- 6.15.14 The Applicant is committed to exploring opportunities to minimise waste produced through the construction phase and decommissioning as far as possible. Materials such as soil excavated for trenches, roads, compound areas and foundations resulting from construction activities will be re-used on-site where possible.
- 6.15.15 Volumes of waste during construction and decommissioning may also put pressure on the capacity of local waste management facilities. It is proposed that this would be managed through a Construction Resource Management Plan (CRMP), which is secured by the CEMP. Therefore, effects are not expected to be significant.

Ground conditions

- 6.15.16 **Chapter 16: Other Environmental Topics** of the Environmental Statement [EN010106/APP/6.1] also assesses hazards to human health, controlled waters, properties and ecology resulting from disturbance of the ground during construction. A Phase 1 Ground Conditions Preliminary Environmental Risk Assessment has been prepared based on desk based information and walkovers and is provided at **Appendix 16B** of the Environmental Statement [EN010106/APP/6.2]. This identifies that the potential contaminant linkages associated with the current use of the Scheme. These are generally classified as very low to moderate in the absence of additional mitigation. They include:
- a. Lateral migration of potentially contaminated groundwater and potential discharge to surface water towards ecological receptors, including nearby SSSIs and SAC.
 - b. Leaching of contaminants (if present) from overlying soils to groundwater and lateral groundwater migration and discharge to surface water.
 - c. Linkages to human health and to properties through disturbance of soils including made ground resulting in release of metal, inorganic and organic chemical contamination within the made ground and groundwater and ground gas.
- 6.15.17 An intrusive site investigation is proposed by the Applicant at the post-consent stage to provide geo-environmental data to evaluate soil and groundwater quality and confirm the above linkages. This in turn will allow for recommendations for any remediation works to remove any unacceptable pollutant linkages on completion of construction.
- 6.15.18 Design mitigation measures suggested at this stage to reduce impacts and effects to very low or low include consultation with Natural England and the Environment Agency regarding the protection of ecological receptors; installing concrete bases with appropriate bunding for plant; implementation of a surface water drainage design as discussed in Section 6.7.

Mitigation plans

6.15.19 The impacts identified in relation to air quality, waste and ground conditions are to be mitigated through measures in the following management plans:

- a. A detailed CEMP will be prepared prior to construction. The CEMP will be secured by a requirement in the DCO and will be in accordance with the Framework CEMP included in **Appendix 16C** of the Environmental Statement [EN010106/APP/6.2].
- b. A detailed Construction Resource Management Plan (CRMP) to manage waste arisings which will form part of the CEMP.
- c. An OEMP will be prepared prior to operation. The OEMP will be secured by a requirement in the DCO and will be in accordance with the Framework OEMP included in **Appendix 16F** of the Environmental Statement [EN010106/APP/6.2].
- d. A DEMP will be prepared prior to decommissioning. The DEMP will be secured by a requirement in the DCO and will be in accordance with the Framework DEMP included in **Appendix 16E** of the Environmental Statement [EN010106/APP/6.2].

Summary

6.15.20 With appropriate mitigation, impacts from the construction and decommissioning of the Scheme in relation to air quality waste management and ground conditions are not likely to lead to significant adverse environmental effects or cumulative effects and can be controlled and minimised as far as possible to acceptable standards. The Scheme is therefore in accordance with NPS EN-1, Draft NPS EN-1, NPPF and local planning policies relating specifically to these impacts.

7 Conclusion

- 7.1.1 The Scheme will be determined pursuant to section 105 of the PA 2008. Applications determined under this section require the Secretary of State to have regard to (a) any local impact report; (b) matters prescribed in relation to development of the description to which the application relates; and (c) any other matters which the Secretary of State considers to be both important and relevant. This Planning Statement provides evidence of the Scheme's compliance with the relevant prescribed matters and relevant planning policy and other matters the Applicant considers are likely to be important and relevant, to inform the Secretary of State's decision as to whether to grant a DCO for the Scheme.
- 7.1.2 There are no specific references to solar NSIPs in NPS EN-1, although once the Draft Energy NPSs are enacted, new applications for solar NSIPs will be required to be determined in accordance with the enacted versions of Draft NPS EN-1 and Draft NPS EN-3.
- 7.1.3 Although solar NSIPs are not specifically identified in the current Energy NPSs the Applicant considers that significant weight should be given to the Scheme's compliance with the policies of the Energy NPSs, and substantial weight should be given to their compliance with the Draft Energy NPSs; with less weight given to the NPPF and local planning policy owing to their focus on guiding development at regional and local levels.
- 7.1.4 The Energy NPSs, Draft Energy NPSs, and other national energy policy sets out the government's aims to provide secure and affordable energy supplies whilst decarbonising the energy system. This is in order to enable the UK to achieve its legally binding commitment to reduce carbon emissions and achieve net zero carbon emissions by 2050; as well as provide a resilient and low cost energy network for the future. The Government recognises in policy that the need to deliver these aims and commitments is immediate and therefore renewable energy NSIPs, including large scale solar projects need to be delivered urgently.
- 7.1.5 The Scheme will deliver these policy aims, providing a significant amount of low carbon electricity over its lifetime; and providing resilience, security and affordability of supplies due to its large scale and proposed integration of BESS. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly whilst providing security and affordability to the energy supply. It is clear that there is a compelling case for the need for the Scheme and that it will deliver national economic and social benefits in line with the government's wider objectives of delivering sustainable development.
- 7.1.6 The Scheme will also deliver other more localised economic, social and environmental benefits. These relate to biodiversity net gain, protection of heritage assets, improvement to soil and water quality and generation of employment and increased local access. With the exception of employment, these have been as a result of the choice of location for the Scheme and the iterative design process which the Applicant has undertaken. With regard to biodiversity, the Scheme is expected to deliver an exemplary project with a biodiversity net gain of

approximately 83% for habitat units, 16% for hedgerow units, and 1% for river units. As a result of the extensive geophysical survey work undertaken of the Order limits, ten areas of high value significant archaeological activity (totalling approximately 97 ha), which were not previously known, have been removed from the developable area of the Sites and will be preserved in situ.

- 7.1.7 The analysis of planning policy compliance demonstrates that the need for the Scheme is supported by planning policy and other national energy and environmental policy and that the Scheme addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where possible.
- 7.1.8 With the mitigation proposed, the ES demonstrates that the Scheme will not have any significant adverse effects in relation to designated landscapes, biodiversity sites or protected species or habitats; flood risk and water quality; transport networks; access; noise and vibration; soils; air quality and land uses. It is however acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets.
- 7.1.9 With regard to landscape and visual amenity the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised through a green infrastructure led landscape and ecological design and increased connectivity and local access through the landscape. In terms of the planning balance, the fact that these effects are localised; will be reversed following the 40 year operational period; and that NPS EN-1 and Draft NPS EN-1 acknowledge that adverse effects are likely, given the scale of energy NSIPs, the national benefits of the Scheme outweigh these localised effects.
- 7.1.10 The analysis of the Scheme's compliance with the relevant national planning policy heritage tests identifies that residual significant adverse effects are expected upon three designated heritage assets; two scheduled monuments and one grade II registered park and garden; during the stages of the Scheme's lifetime. The impacts on these assets have been determined to have less than substantial harm. This less than substantial harm is to the setting of these assets with no direct adverse physical impacts resulting from the Scheme. There will also be no permanent loss of the significance of these designated assets allowing future generations to retain an understanding of their settings because the Scheme is proposed to be operational for 40 years, with its decommissioning secured through a DCO requirement. The proposed mitigation strategy minimises the harm to their settings and the Scheme provides a benefit to one scheduled monument by removing it from agricultural use and therefore potential future plough damage. The time limited and reversible loss of significance to the setting of a small number of designated assets is therefore considered to be justified and outweighed by the benefits of the Scheme. Mitigation for residual significant adverse effects upon below ground archaeology is to be implemented where possible by firstly avoidance of these areas in the detailed design process and then a programme of fieldwork and recording where necessary.
- 7.1.11 As described in Section 6 and **Appendix B** of this Planning Statement, whilst it has not been possible to avoid all impacts these have been minimised, where

possible, through careful design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. The Scheme is also considered to be broadly consistent with relevant local planning policy. Therefore, it is considered that development consent for the Scheme should be granted.

Appendices

Appendix A Other relevant planning history within or close to the Order limits

Local Planning Authority	Application Reference	Description	Application Status	Submission/Decision Date	Relevance to the Scheme
West Suffolk Council	DC/18/0851/FUL	Planning Application - Vehicle de-pollution facility within a steel framed enclosure	Approved	19/07/2018	Adjacent to the south-eastern area of Sunnica East Site B
West Suffolk Council	F/2010/0012/FUL	Change of use of land to use as a residential caravan site for two gypsy families with a total of 5 caravans including the erection of 2 amenity buildings and the erection of a 2 metre high boundary fence	Approved subject to legal agreement	04/01/2011	Adjacent to the south-eastern area of Sunnica East Site B
West Suffolk Council	F/2004/0397/FUL	Erection of a single storey building for the decontamination of vehicles (Major Development)	Approved	13/07/2004	Adjacent to the south-eastern area of Sunnica East Site B
West Suffolk Council	DCON(2)/15/2109	Application to Discharge Conditions 6 (deliveries management plan), 7 (access improvements), 17 (surface water disposal), 18 (pollution control), 19 (piling or foundation design) and 20 (materials) of DC/15/2109/FUL	Approved	19/07/2016	Adjacent to the eastern area of Sunnica East Site B
West Suffolk Council	DCON(3)/15/2109	Application to Discharge Conditions 10 (security lights) and 12 (archaeology) of DC/15/2109/FUL	Condition(s) Part Discharged	17/02/2017	Adjacent to the eastern area of Sunnica East Site B
West Suffolk Council	DC/16/0936/FUL	Planning Application - Gas network entry facility comprising hardstanding, fenced compounds, plant and machinery, landscape bund plus ancillary and related development required in connection with the Bay Farm AD plant planning permission DC/15/2109/FUL	Approved	29/06/2016	The built development is in land excluded from Order Limits, but surrounded by Sunnica East Site B, towards the north-eastern area. Aerial photography shows that the development was had been constructed by July 2018.
West Suffolk Council	DCON(1)/16/0936	Discharge of Conditions application for conditions 5 -deer and rabbit protection and 7 -landscape management plan for DC/16/0936/FUL	Approved	02/03/2017	Condition discharge (approved) of the above Planning Permission. The Landscaping area is outside of the Planning

Local Planning Authority	Application Reference	Description	Application Status	Submission/Decision Date	Relevance to the Scheme
					Permission boundary, but within the facility developer's ownership boundary shown by the planning application. This is towards the north-eastern area within Sunnica East Site B (within Order Limits). The Aerial photography shows that the landscaping was implemented by July 2018 and the approved landscape management plan covers a period of only 3 years. This is therefore part of the existing baseline and has been taken into account as such in the DCO application.
West Suffolk Council	DC/14/1565/AG1	Determination in Respect of Agricultural Development - Construction of irrigation reservoir (10 million gallons)	Prior Approval Required	15/09/2014	Adjacent to the Sunnica Grid Connection Route A corridor between Sunnica East Site A and B
West Suffolk Council	DCON(1)/15/2109	Application to Discharge Condition 4 (Traffic Management Plan) of DC/15/2109/FUL	Approved	24/05/2016	Adjacent to the eastern area of Sunnica East Site B
West Suffolk Council	NMA(A)/15/2109	Non Material Amendment to DC/15/2109/FUL - Substitute previously approved plans as follows: 1. 20217/004 rev. G Layout 2. 20217/011 rev. C Layout 3. 20217/010 rev. B Elevations 4. 20217/006 rev. B Elevations 5. 20217/007 rev. B Elevations for the following plans which show the site layout as build and how it compares to that previously approved: 1. 20217/1004 rev. A Site Layout 2. 20217/1011 rev. B Overall Site Layout 3. 20217/006 rev. H Elevations sheet 1	Approved	11/07/2019	Adjacent to the eastern area of Sunnica East Site B

Local Planning Authority	Application Reference	Description	Application Status	Submission/Decision Date	Relevance to the Scheme
		4. 20217/007 rev. H Elevations sheet 2 5. 20217/009. rev. G - new plan: plant and equipment			
West Suffolk Council	DC/21/0217/FUL	Planning application - a. Commercial polyhouses with office and welfare area; b. hardstanding and loading bays, car parking, reservoir, landscaping and associated works; c. new access	Pending Decision	04/02/2021	Adjacent to the north-eastern area of Sunnica East Site B
West Suffolk Council	DC/15/2109/FUL	Planning Application - Installation of on-farm anaerobic digestion plant to produce biogas with three digesters, silage clamps, lagoon, pipeline to gas grid, landscaping and associated infrastructure.	Approved	08/03/2016	Adjacent to the eastern area of Sunnica East Site B
West Suffolk Council	F/2011/0014/FUL	Change of use of land to use as a residential caravan site for two gypsy families with a total of 5 caravans including the erection of 2 amenity buildings and the erection of a 2 metre high boundary fence	Approved subject to legal agreement	04/01/2011	Adjacent to the south-eastern area of Sunnica East Site B
East Cambridgeshire District Council	21/00929/AGN	Agricultural storage building with open sided lean to	Not required - Prior Notification	15/07/2021	Adjacent to the north-western area of Sunnica West Site A
East Cambridgeshire District Council	14/01165/DISA	To discharge conditions 3 (Contamination) and 7 (Tree Protection) on decision dated 4.6.15 for Erection of replacement dwelling and associated works	Condition/s Discharged	11/10/2018	Adjacent to Sunnica Grid Connection Route B corridor between Burwell substation and Sunnica West Site A
East Cambridgeshire District Council	19/01564/FUL	Erection of farm office, parking and associated works	Approved	26/03/2020	Adjacent to Sunnica Grid Connection Route B corridor between Burwell substation and Sunnica West Site A
East Cambridgeshire District Council	14/01165/FUL	Erection of replacement dwelling and associated works	Approved	04/06/2015	Adjacent to Sunnica Grid Connection Route B corridor between Burwell substation and Sunnica West Site A
East Cambridgeshire District Council	19/01564/DISA	To discharge Conditions 3 (Foul & Surface Water) and 7 (External Materials) for decision 19/01564/FUL dated 26 March	Condition/s Discharged	26/04/2021	Adjacent to Sunnica Grid Connection Route B corridor

Local Planning Authority	Application Reference	Description	Application Status	Submission/Decision Date	Relevance to the Scheme
		2020 for Erection of farm office, parking and associated works			between Burwell substation and Sunnica West Site A
East Cambridgeshire District Council	21/00447/AGN	Erection of a steel framed agricultural building	Not required - Prior Notification	15/04/2021	Adjacent to Sunnica Grid Connection Route B corridor between Burwell substation and Sunnica West Site A
Suffolk County Council	F/06/0009	Continue land raising and site restoration until 31 December 2006 and vary depth of soil required for site restoration; (Variation of conditions 1 and 18 of F/04/0285).	Approved	16/02/2006	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	F/2000/532	Revise Restoration Contours to increase landfill capacity and extend the duration of permission by three years to July 2004 (variation of condition numbers 3 and 19 of planning permission F/97/03)	Approved	07/12/2000	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	F/04/0227	Extraction of sand and gravel; Importation of construction and demolition waste to reclaim into recycled aggregate and soils for restoration to agriculture/grassland/wood with ponds; Creation of new quarry access onto Elms Road, (U6004).	Approved	09/08/2004	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	F/06/0300	Proposed concrete batching plant and ancillary facilities - (variation of conditions 2, 47, 50, 51 and 53 of planning permission F04/227, to allow for importation of materials for use in the concrete batching process and provide for change of phasing of the quarry restoration, i.e. the proposed plant site to be restored at the end of the quarry operation.)	Approved	26/05/2006	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	F/09/0389	Variation of Condition 16 of permission F/04/227 in order to reduce safeguarded margin from National Gas Transmission pipeline within site from 12 metres to 6.1 metres.	Approved	27/08/2006	Adjacent to the south-eastern area of Sunnica East Site B

Local Planning Authority	Application Reference	Description	Application Status	Submission/Decision Date	Relevance to the Scheme
Suffolk County Council	F/15/1386	Proposed revision to phasing mineral extraction and restoration to permit approved phase 7 to be extracted prior to subsequent development	Approved	02/10/2015	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	SCC\0273\16F	Variation of Condition 2 (duration of permission), and conditions 48 and 49 (restoration) of permission F/15/1386, and consequential variation to condition 1, 27, 44, and 45 by way of the wording of and reference in these conditions to drawings and documentation that will have to be amended in light of the proposed variation to conditions 48 and 49.	Approved	24/02/2017	Adjacent to the south-eastern area of Sunnica East Site B
Suffolk County Council	SCC\0107\17F	ART 27 Application - Submission of condition 52 (Aftercare scheme) of Planning Permission SCC\0273\16F. Original Number SCC\0273\16F	Approved	26/06/2017	Adjacent to the south-eastern area of Sunnica East Site B
West Suffolk Council	F/2012/0464/FUL	Installation of a 7.5MW Solar Farm (Major Development) (Departure from the Development Plan)	Approved	30/11/2012	Approximately 500m southeast of Sunnica East Site B and immediately west of the A11
East Cambridgeshire District Council	18/00752/ESO	Sustainable 'Garden Village' extension to Kennett - residential-led development with associated employment and community uses (including care home and/or sheltered housing) and a new primary school with a pre-school (nursery) facilities, supporting infrastructure and open space/landscaping.	Approved	15/04/2020	Approximately 450m to the east of Sunnica West Site A.

Appendix B Policy Accordance Table

Table 1 Planning policy relevant to the need for nationally significant energy infrastructure

Table 2 Planning policy relevant to good design and climate change adaptation

Table 3 Planning policy relevant to landscape and visual effects

Table 4 Planning policy relevant to cultural heritage

Table 5 Relevant policy requirements relating to biodiversity

Table 6 Relevant policy requirements relating to flood risk, drainage, water quality and resources

Table 7 Relevant policy relevant to noise and vibration

Table 8 Relevant policy requirements relating to socio-economics, human health and land use

Table 9 Relevant policy requirements relating to other impacts of construction, operation and decommissioning - air quality, waste and ground conditions

Table 10 Relevant policy requirements relating to major accidents and disasters

Table 11 Relevant policy requirements for the transport and access assessment

Table 1 Planning policy relevant to the need for nationally significant energy infrastructure

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1*		
Paragraph 2.2.2	The Government is working to ensure their efforts produce the major, rapid change the UK needs. Within a market-based system and with severe constraints on public expenditure in the near-term, the focus of Government activity in this transformation is clear. It should be on developing a clear, long-term policy framework which facilitates investment in the necessary new infrastructure (by the private sector) and in energy efficiency.	The Statement of Need [EN010106/APP/7.1] presents a detailed compelling case for why the Scheme is urgently required and at the scale proposed. Overall, the Applicant, as a private sector organisation, has developed proposals for the Scheme, which will be a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Its proposed National Electricity Transmission System (NETS) connection means that it would play its part in helping National Grid ESO (NGESO) manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers, both of which are identified in government policy as being required for resilient energy supplies in the future. Maximising the capacity of generation in the proposed Cambridge/Suffolk border area, also brings benefits to all consumers, and the solar industry generally. The Scheme will quickly deliver significant amounts of low carbon power before many other large-scale solar projects which, although needed, are behind the Scheme in the development process. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale. The Scheme therefore directly responds to the Government's objective of delivering a major and rapid change to the energy system through the delivery of infrastructure by private sector developers in the market system.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 2.2.6	The UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification. Under some of the illustrative 2050 pathways, electricity generation would need to be virtually emission-free, given that we would expect some emissions from industrial and agricultural processes, transport and waste to persist. By 2050, we can expect that fossil fuels will be scarcer, but will still be in demand, and that prices will therefore be far higher. Further, the UK's own oil and gas resources will be depleting and, worldwide, the costs and risks of extracting oil in particular will increase.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Chapter 6 Climate change of the ES [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296 MWh of electricity with an average operational greenhouse gas intensity of 2.9 grams of carbon dioxide equivalent per kWh (gCO₂e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate. Furthermore, Chapter 6 Climate change of the ES [EN010106/APP/6.1] acknowledges that it is likely that the land use change associated with the conversion of arable land to grassland during its 40 year operation would have a beneficial greenhouse gas impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), as grassland has a higher carbon sequestration value than cropland. The Scheme will make a contribution to the delivery of, secure, affordable, low carbon electricity generation infrastructure, in direct accordance with the Government's objectives.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 2.2.22	Looking further ahead, the 2050 pathways show that the need to electrify large parts of the industrial and domestic heat and transport sectors could double demand for electricity over the next forty years. It makes sense to switch to electricity where practical, as electricity can be used for a wide range of activities (often with better efficiency than other fuels) and can, to a large extent, be scaled up to meet demand. To meet emissions targets, the electricity being consumed will need to be almost exclusively from low carbon sources. Contrast this with the first quarter of 2011, when around 75% of our electricity was supplied by burning gas and coal.	As explained in the Statement of Need [EN010106/APP/7.1] , the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved. The Scheme will make a sizeable contribution to meeting the Government's decarbonisation commitments, in direct accordance with this policy.
Paragraph 2.2.23	The UK must therefore reduce over time its dependence on fossil fuels, particularly unabated combustion. The Government plans to do this by improving energy efficiency and pursuing its objectives for renewables, nuclear power and carbon capture and storage. However some fossil fuels will still be needed during the transition to a low carbon economy	The Scheme will make a sizeable contribution to meeting the Government's decarbonisation commitments, in direct accordance with this policy.
Paragraph 3.1.1	The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions.	Although solar is not included within the scope of the current NPS, this is because at that time they were published (2011) it was not proven at scale. However, 10 years on, large scale solar generation is economically and technically viable as well as being economically and technically preferential to consumers. As a result, solar NSIP developments are included in the Draft Energy NPSs that the Government published for consultation on 6 September 2021. The 2011 NPSs and the 2021 Draft NPSs are therefore considered to be important and relevant to the Scheme and are likely to form the primary decision-making framework.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 3.1.2	It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives.
Paragraph 3.1.3	The IPC should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part.	Whilst solar generation schemes are not directly covered within the 2011 Energy NPSs, this is because at the time they were prepared solar technology was not considered viable at NSIP scale. The Applicant considers that NPS EN-1 applies to the scheme and further Draft NPS EN-3 now includes solar generation schemes. The Applicant therefore considers that the SoS should assess the application on the basis that its need has been demonstrated. In any case, the Statement of Need [EN010106/APP/7.1] sets out a compelling case for the need for the Scheme.
Paragraph 3.1.4	The IPC should give substantial weight to the contribution which projects would make towards satisfying this need when considering applications for development consent under the Planning Act 2008.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved. This contribution is an important and relevant matter which should be given substantial weight in the SoS decision, as per this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 3.2.2	As we move towards 2050 the ways in which we use energy will be transformed. We need to become less dependent on some forms of energy, as new and innovative low carbon technologies and energy efficiency measures are taken up. We also shall become more dependent on others – for example, demand for electricity will increase if we electrify large parts of transport, heating and industry	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives.
Paragraph 3.2.3	This Part of the NPS explains why the Government considers that, without significant amounts of new large-scale energy infrastructure, the objectives of its energy and climate change policy cannot be fulfilled. However, as noted in Section 1.7, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. This Part also shows why the Government considers that the need for such infrastructure will often be urgent. The IPC should therefore give substantial weight to considerations of need. The weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project's actual contribution to satisfying the need for a particular type of infrastructure.	As explained in the Statement of Need [EN010106/APP/7.1], the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved. An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES prepared to report the findings [EN010106/APP/6.1]. Overall, with appropriate mitigation implemented, this identifies the residual significant adverse effects of the Scheme during its 40 year operation. When considered relative to the large scale nature of the Scheme these effects are considered to be outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation.
Paragraph 3.3.1	Electricity meets a significant proportion of our overall energy needs and our reliance on it is likely to increase as we move towards our 2050 goals. The key reasons why the Government believes there is an urgent need for new electricity NSIPs are set out below.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 3.3.2	The Government needs to ensure sufficient electricity generating capacity is available to meet maximum peak demand, with a safety margin or spare capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events. This is why there is currently around 85 GW of total generation capacity in the UK, whilst the average demand across a year is only for around half of this	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives. The Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.3	The larger the difference between available capacity and demand (i.e. the larger the safety margin), the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption. This helps to protect businesses and consumers, including vulnerable households, from rising and volatile prices and, eventually, from physical interruptions to supplies that might impact on essential services.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives. The Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.4	There are benefits of having a diverse mix of all types of power generation. It means we are not dependent on any one type of generation or one source of fuel or power and so helps to ensure security of supply. In addition, as set out briefly below, the different types of electricity generation have different characteristics which can complement each other: fossil fuel generation can be brought on line quickly when there is high demand and shut down when demand is low, thus complementing generation from nuclear and the intermittent generation from renewables. However, until such time as fossil fuel generation can effectively operate with Carbon Capture	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The Government expects solar technology to play a major role in delivery of these objectives.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	and Storage (CCS), such power stations will not be low carbon (see Section 3.6). renewables offer a low carbon and proven (for example, onshore and offshore wind) fuel source, but many renewable technologies provide intermittent generation (see Section 3.4); and nuclear power is a proven technology that is able to provide continuous low carbon generation, which will help to reduce the UK's dependence on imports of fossil fuels (see Section 3.5). Whilst capable of responding to peaks and troughs in demand or supply, it is not as cost efficient to use nuclear power stations in this way when compared to fossil fuel generation.	
Paragraph 3.3.5	The UK is choosing to largely decarbonise its power sector by adopting low carbon sources quickly. There are likely to be advantages to the UK of maintaining a diverse range of energy sources so that we are not overly reliant on any one technology (avoiding dependency on a particular fuel or technology type). This is why Government would like industry to bring forward many new low carbon developments (renewables, nuclear and fossil fuel generation with CCS) within the next 10 to 15 years to meet the twin challenge of energy security and climate change as we move towards 2050	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme will deliver significant amounts of low-carbon power before many other large-scale solar projects. Although all these other solar projects are needed, they are behind the Scheme in the development process. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale. Large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. This is an important and relevant consideration for the Secretary of State in his decision making process. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 3.3.6	Within the strategic framework established by the Government it is for industry to propose the specific types of developments that they assess to be viable. This is the nature of a market-based energy system. The IPC should therefore act in accordance with the policy set out at in Section 3.1 when assessing proposals for new energy NSIPs.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Government expects solar technology to play a major role in delivery of these objectives.
Paragraph 3.3.15	In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme will deliver significant amounts of low-carbon power before many other large-scale solar projects. Although all these other solar projects are needed, they are behind the Scheme in the development process. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale. Large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. This is an important and relevant consideration for the Secretary of State in his decision making process Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 3.4.3	The UK has substantial renewable energy resources, for example the British Isles have 40% of Europe's wind and some of the highest tidal reaches in the world. Unlike other technologies, the cost of renewables is in the construction and maintenance alone as the resource itself is usually free, so it helps protect consumers against the volatile but generally increasing cost of fossil fuels. Future large-scale renewable energy generation is likely to come from the following sources: -Onshore Wind – onshore wind is the most well-established and currently the most economically viable source of renewable electricity available for future large-scale deployment in the UK;	This was drafted and came into force in 2011, and relates to the technology available at the time. Since then, technology has developed and solar is now viable at NSIP scale. This is acknowledged by the Government in Draft NPS EN-1 which was published for consultation on 6 September 2021. This sets out an up-to-date position on the Government's expectations for the technologies that will be needed to meet its objectives and commitments for the energy system. This includes solar development as a key element, as demonstrated by the following extracts from Draft NPS EN-1 (emphasis added): <u>3.3.44: "Known technologies that are included within the scope of this NPS are: Offshore Wind (including floating wind), Solar PV, Wave, Tidal Range, Tidal Stream, Pumped Hydro, Energy from</u>

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	-Offshore Wind – offshore wind is expected to provide the largest single contribution towards the 2020 renewable energy generation targets; - Biomass – biomass is a significant source of renewable and low carbon energy. It involves the combustion of fuel, such as wood, which is renewable because, through replanting and regrowth, the biomass can be replaced in a matter of decades and this cycle can be continuously repeated. Whilst energy is required to grow, harvest and transport it, biomass is considered to be low carbon, providing that the biomass has been cultivated, processed and transported with due consideration of sustainability. Its combustion also displaces emissions of carbon dioxide ordinarily released using fossil fuels; -Energy from Waste (EfW) – the principal purpose of the combustion of waste, or similar processes (for example pyrolysis or gasification) is to reduce the amount of waste going to landfill in accordance with the Waste Hierarchy and to recover energy from that waste as electricity or heat. Only waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill should be used for energy recovery. The energy produced from the biomass fraction of waste is renewable and is in some circumstances eligible for Renewables Obligation Certificates, although the arrangements vary from plant to plant; and -Wave and Tidal – the UK has the potential for wave and tidal energy and there are now full scale prototypes working towards array scale and pre-commercial deployment. However many of the technologies for making use of the wave resource and tidal currents are still developing. Proven technology exists for tidal range generation but proposed projects are still some time from commencement.	<i>Waste (including ACTs) with or without CCS, Biomass with or without CCS, Natural Gas with or without CCS, low carbon hydrogen, large-scale nuclear, Small Modular Reactors, Advanced Modular Reactors, and fusion power plants. <u>The need for all these types of infrastructure is established by this NPS and is urgent.</u></i> <u>3.3.21: “Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.”</u>

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Paragraph 1.4.5 explains how this NPS relates to wave and tidal generation.	
Paragraph 3.4.5	Paragraph 3.4.1 above sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme will deliver significant amounts of low-carbon power before many other large-scale solar projects. Although all these other solar projects are needed, they are behind the Scheme in the development process. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale. Large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. This is an important and relevant consideration for the Secretary of State in his decision making process Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
NPS EN-3		
Paragraph 1.1.1	Electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy. There are ambitious renewable energy targets in place and a significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target (see Section 3.4 of EN-1).	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Its proposed National Electricity Transmission System (NETS) connection means that it would play its part in helping National Grid ESO (NGESO) manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers, both of which are identified in government policy as being required for resilient energy supplies in the future.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
National Planning Policy Framework (NPPF)		
Paragraph 8	Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	The Scheme achieves the three objectives of sustainable development. The Scheme's socio-economic and environmental impacts have been assessed and the conclusions presented in the ES [EN010106/APP/6.1], including in Chapter 12: Socio-Economics and Land Use, Chapter 15: Human Health, and Chapter 6: Climate Change. The Scheme will supply secure, affordable, low carbon electricity to the consumer, thereby satisfying the economic objective of sustainable development. It will also have a beneficial significant effect on employment during the construction phase, as identified by Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], In terms of the social objective, the Scheme will supply electricity which is needed (increasingly) in order to power homes, industry and transport. The Scheme also offer other social benefits, including the provision of new permissive paths during its operational life. The socio-economic impact of the Scheme has been assessed by ES [EN010106/APP/6.1], Chapter 12: Socio-Economics and no residual significant adverse socio-economic impacts have been identified during the operational phase of the Scheme. The only significant residual adverse effects identified during the construction and decommissioning phases are temporary impacts on PRow users.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The Scheme also achieves the environmental objective. The significant environmental effects of the Scheme have been assessed by the ES [EN010106/APP/6.1] and the impacts considered by the Planning Statement in light of relevant policy. This identifies that the historic environment will be protected for the long term, since the impacts of the Scheme are reversible following decommissioning, and that the benefits of the Scheme outweigh the less than substantial harm the Scheme would have on heritage assets during construction and operational phases. It also concludes that the landscape and other environmental impacts have been reduced by mitigation embedded into the design and that the scheme benefits outweigh its impacts. The Scheme will also deliver environmental benefits, including a substantial biodiversity net gain. Most significantly, the Scheme will contribute to the urgent requirement to move to a low carbon economy.
Paragraph 158	When determining planning applications for renewable and low carbon development, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.	The Applicant has demonstrated the urgent need for the Scheme in its Statement of Need [EN010106/APP/7.1]. This explains why large scale solar, and the Scheme is needed. Chapter 4 Alternatives and Design Evolution of the ES [EN010106/APP/6.1] and Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] explain and justify the reasons for the selection of the Site. The ES [EN010106/APP/6.1] sets out mitigation that is incorporated into the Scheme to make its effects acceptable. The Planning Statement considers residual effects of the Scheme that are outlined in the ES [EN010106/APP/6.1] and considers these against relevant policy. It identifies that the Scheme is policy compliant and the planning balance is in favour of consent being granted. This means that the effects of the Scheme are acceptable and consent should be granted.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV6: Renewable Energy Development	Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to: · The local environment and visual landscape impact. · Impact on the character and appearance of the streetscape/buildings. · Key views, in particular those of Ely Cathedral. · Protected species. · Residential amenity. · Safeguarding areas for nearby airfields; and · Heritage assets	An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES prepared to report the findings [EN010106/APP/6.1]. This identifies the impacts of the Scheme, including on landscape, views, protected species, residential amenity, airfields and heritage assets, as applicable. The substantial environmental, social and economic benefits of the scheme are considered to not be outweighed by its impacts, and it therefore accords with this policy.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM8: Low and Zero Carbon Energy Generation	All proposals for generation or recovery of low carbon or renewable energy, such as wind turbines, biomass, and combined heat and power, will be encouraged subject to the following criteria: - proposals will be required to demonstrate the new carbon saving benefit that they will create, taking into account both carbon dioxide savings from renewable energy generation and any additional carbon dioxide generation that results from the proposal; - proposals will be required to include a landscape and visual assessment which should, where appropriate: - show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact; - include mitigation measures to address the visual impact of the scheme; - include an appraisal of the impact on the environment of the	Chapter 6 Climate change of the ES [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296 MWh of electricity with an average operational greenhouse gas intensity of 2.9 grams of carbon dioxide equivalent per kWh (gCO₂e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate. Furthermore, Chapter 6 Climate change of the ES [EN010106/APP/6.1] acknowledges that it is likely that the land use change associated with the conversion of arable land to grassland during its 40 year operation would have a beneficial greenhouse

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	proposal either in isolation or cumulatively with any other similar developments; c. where appropriate the proposal includes provision for mitigation and compensation measures, such as habitat enhancement or relocation.	gas impact of around 100,000 tonnes carbon dioxide equivalent (tCO ₂ e), as grassland has a higher carbon sequestration value than cropland. The Scheme has therefore demonstrated a substantial carbon saving, in accordance with part a of this policy. An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES prepared to report the findings [EN010106/APP/6.1]. This includes a landscape and visual assessment and identifies the impacts of the Scheme, including on landscape, views, the environment, and habitats.
Draft NPS EN-1*		
Paragraph 2.1.2	To produce enough energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness. Part 3 provides further details on the need for and importance of energy to economic prosperity and social well-being	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand.
Paragraph 2.2.1	The UK has continually demonstrated its global leadership on climate change mitigation through robust and ambitious targets to reduce carbon emissions. Through the Climate Change Act 2008 (CCA), the UK became the first country to set a legally binding emissions reduction target for 2050 and carbon budgets which limit the amount of Greenhouse Gas (GHG) the UK emits over successive five-year periods. These carbon budgets are set to ensure the UK keeps to a trajectory consistent with meeting its 2050 target.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. Chapter 6 Climate change of the ES [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		MWh of electricity with an average operational greenhouse gas intensity of 2.9 grams of carbon dioxide equivalent per kWh (gCO ₂ e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 2.2.4	In June 2019, the UK became the first major economy to legislate for a 2050 net zero GHG emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK set out its NDC to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the Government announced the sixth carbon budget (CB6) and as a result will legislate to reduce GHG emissions by ~78% by 2035 compared to 1990 levels.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. Chapter 6 Climate change of the ES [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296 MWh of electricity with an average operational greenhouse gas intensity of 2.9 grams of carbon dioxide equivalent per kWh (gCO ₂ e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 2.3.2	Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and NDC. This will require a step change in the decarbonisation of our energy system.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 2.3.3	Meeting these objectives necessitates a significant amount of energy infrastructure, both large and small-scale. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport them into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 2.3.4	The sources of energy we use will also need to change. Today, our energy system is dominated by fossil fuels. Although representing a record low, fossil fuels still accounted for just over 79 per cent of energy supply in 2019 ¹² . We will need to dramatically increase the volume of energy supplied from low carbon sources and reduce the amount provided by fossil fuels.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 2.3.6	Decarbonisation also means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity ¹⁴ . Low carbon hydrogen is also likely to play an increasingly significant role.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 3.1.1	This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives. However, as noted in Section 1.7, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES prepared to report the findings [EN010106/APP/6.1] . Overall, with appropriate mitigation implemented, this identifies the residual significant adverse effects of the Scheme during its 40 year operation. When considered relative to the large scale nature of the Scheme these effects are considered to be outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation.
Paragraph 3.1.2	This Part also shows why the government considers that the need for such infrastructure will often be urgent. The Secretary of State should give substantial weight to considerations of need. The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 3.2.5	The Secretary of State should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the government has demonstrated that there is a need for those types of infrastructure, as described for each of them in this Part.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 3.2.6	In this Part, the Secretary of State identifies the level of need for new energy infrastructure. In relation to the weight to be given to that identified need, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per this policy, the established urgent need for the Scheme should be given substantial weight in the decision.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives.
Paragraph 3.3.8	Given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system in 2050 for a wide range of demand, decarbonisation, and technology scenarios.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives.
Paragraph 3.3.9	The government has considered alternatives to the need for new large-scale electricity infrastructure ²² and concluded that these would be limited to reducing total demand for electricity through efficiency measures or through greater use of low carbon hydrogen in decarbonising the economy; reducing maximum demand through demand side response; and, increasing the contribution of decentralised and smaller-scale electricity infrastructure.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.11	The precise level of electricity demand in 2050 as the energy system transitions is uncertain and could be affected by alternative means of decarbonising these sectors, such as the use of low carbon hydrogen. However, it is prudent to plan on a	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	conservative basis to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios, including where the use of hydrogen is limited.	generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.13	Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives.	As also explained in the Statement of Need [EN010106/APP/7.1] , this paragraph sets out why large scale electricity generation facilities are needed. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.14	This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	As also explained in the Statement of Need [EN010106/APP/7.1] , this paragraph sets out why large scale electricity generation facilities are needed. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.20	There is an urgent need for new electricity generating capacity to meet our energy objectives.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand.
Paragraph 3.3.21	Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 3.3.24	Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. There is currently around 4GW of electricity storage operational in GB, around 3GW of which is pumped hydro storage and around 1GW is battery storage.	This paragraph explains the need for energy storage systems to compliment generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.25	Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.	This paragraph explains the need for energy storage systems to compliment generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.43	All the generating technologies mentioned above are urgently needed to meet the Government's energy objectives by: • providing security of supply (by avoiding concentration risk and not relying on one fuel or generation type) • providing an affordable, reliable system (through the deployment of technologies with complementary characteristics) • ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.44	Known technologies that are included within the scope of this NPS are: Offshore Wind (including floating wind), Solar PV, Wave, Tidal Range, Tidal Stream, Pumped Hydro,	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Energy from Waste (including ACTs) with or without CCS, Biomass with or without CCS, Natural Gas with or without CCS, low carbon hydrogen, large-scale nuclear, Small Modular Reactors, Advanced Modular Reactors, and fusion power plants. The need for all these types of infrastructure is established by this NPS and is urgent. New coal or large-scale oil-fired electricity generation are not consistent with the transition to net zero due to their high specific emissions and so are not included within the need case of this NPS and we are taking active steps to phase them out of the energy system.	which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.59	Paragraphs 3.3.1-3.3.15 set out the need for additional electricity required over the coming decades with 3.3.15 to 3.3.19 setting out the electricity infrastructure needed to support this.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand.
Paragraph 3.3.61	Given this need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. This paragraph further emphasises that the need for the Scheme should be taken as being urgent.
Paragraph 3.3.62	It is not the Government's intention in presenting any of the figures or targets in this NPS to propose limits on any new electricity infrastructure that can be consented in accordance with the energy NPSs. It is not the role of the planning system to deliver specific amounts or limit any form of electricity infrastructure covered by this NPS. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types.	As explained in the Statement of Need [EN010106/APP/7.1] , the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward.	This paragraph further emphasises the scale of the urgent need and establishes that the fact there may be other similar schemes in the planning system is not a reason to limit the number of approvals and a large number of approved schemes is beneficial in terms of enabling the market to efficiently deliver the infrastructure that is needed.
Paragraph 3.3.63	The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. This paragraph emphasises that a range of generation technologies are needed and the delivery of the overall balance of technology in the generation system should respond to market forces and is not something for the planning system to seek to control.
Paragraph 3.3.65	Within the strategic framework established by the government it is for industry to propose the specific types of developments that they assess to be viable. This is the nature of a market-based energy system. The Secretary of State should act in accordance with the policy set out in Section 3.2 when assessing proposals for new electricity NSIPs.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. This paragraph emphasises that a range of generation technologies are needed and the delivery of the overall balance of technology in the generation system should respond to market forces and is not something for the planning system to seek to control.
Draft NPS EN-3		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 2.47.1	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation worldwide. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels ⁴¹ , large-scale solar is now viable in some cases to deploy subsidy-free and at little to no extra cost to the consumer. The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.	As explained in the Statement of Need [EN010106/APP/7.1], the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivery of these objectives. This paragraph further emphasises that large scale solar development, in particular, is needed to meet the government's objectives. The Scheme directly accords with this.

*NB – all of sections 2 and 3 of NPS EN-1 are considered relevant, and all of sections 2 and 3 of Draft NPS EN-1, except for some paragraphs relating to technologies that are not applicable, are considered relevant. This table extracts the primary policy references.

Table 2 Planning policy relevant to good design and climate change adaptation

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 4.5.1	The visual appearance of a building is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object — be it a building or other type of infrastructure — including fitness for purpose and sustainability, is equally important. Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to place and in compliance with this part of the policy. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design. The construction of the Scheme has also considered the impacts of the resource use and climate change. The Scheme demonstrates efficient use of natural resources and energy and is therefore in compliance with this aspect of the policy.
Paragraph 4.5.3	In the light of the above, and given the importance which the Planning Act 2008 places on good design and sustainability, the IPC needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the IPC should satisfy itself that the applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible. Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design. The construction of the Scheme has also considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]). The Scheme therefore

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	substations will assist in ensuring that such development contributes to the quality of the area.	demonstrates sustainability and sensitive use of materials in compliance with this policy.
Paragraph 4.5.4	For the IPC to consider the proposal for a project, applicants should be able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. In considering applications the IPC should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy.	The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design and how the design process was conducted, including an explanation of rationale behind design decisions. The Scheme therefore demonstrates full compliance with this policy.
Paragraph 4.5.5	Applicants and the IPC should consider taking independent professional advice on the design aspects of a proposal. In particular, Design Council CABE can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service.	The Applicant has engaged extensively with officers of the local planning authorities in the development of the design through workshops held during the various stages of consultation. This is explained in the Consultation Report [EN010106/APP/5.1] and the Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application. Although Design Council CABE was not consulted by the Applicant, relevant officers have inputted into design discussions and the Scheme has therefore taken independent and professional design advice, in compliance with this policy.
Paragraph 4.8.3	To support planning decisions, the Government produces a set of UK Climate Projections and is developing a statutory National Adaptation Programme. In addition, the Government's Adaptation Reporting Power will ensure that reporting authorities (a defined list of public bodies and statutory undertakers, including energy utilities) assess the risks to their organisation presented by climate change. The IPC may take into account energy utilities' reports to the Secretary of State when considering adaptation measures proposed by an applicant for new energy infrastructure.	UKCP18 climate projections have been used to identify potential future climate change impacts on the Scheme. The potential impacts of climate change on the Scheme, and associated mitigation measures, are outlined in Sections 6.7, 6.8 and 6.9 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1] .
Paragraph 4.8.4	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional	No additional impacts have been identified as a result of the climate change mitigation measures presented in Chapter 6: Climate Change of the ES [EN010106/APP/6.1] .

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change	
Paragraph 4.8.5	New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change. While not required by the EIA Directive, this information will be needed by the IPC.	As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1] of the ES, various GHG mitigation measures are embedded within the Scheme and are included within the Framework Construction Environmental Management Plan (CEMP; outlined in Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). This embedded mitigation has been implemented to reduce the GHG impact of the Scheme. The Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]) also includes various climate change resilience measures embedded within the Scheme. The ES [EN010106/APP/6.1] therefore provides the relevant information required to comply with this policy. A Framework DEMP is provided at provided at Appendix 16E of the ES [EN010106/APP/6.2]. This sets out that similar measures to the framework CEMP will be developed prior to the decommissioning phase to encourage the use of lower-carbon and more climate change resilient methods.
Paragraph 4.8.6	The IPC should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of the ES, the IPC should consider whether they need to request further information from the applicant.	As stated in Chapter 6: Climate Change of the ES [EN010106/APP/6.1] of the ES, UK Climate Projections 2018 (UKCP18) data were obtained to determine the historic and future baseline conditions. Future climate change impacts are reviewed based on the UKCP18 projections. The Scheme is therefore in full compliance with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 4.8.8	The IPC should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	As stated in Chapter 6: Climate Change of the ES [EN010106/APP/6.1] of the ES, UK Climate Projections 2018 (UKCP18) data were obtained to determine the historic and future baseline conditions. Future climate change impacts are reviewed based on the UKCP18 projections.
Paragraph 4.8.9	Where energy infrastructure has safety critical elements (for example parts of new fossil fuel power stations or some electricity sub-stations), the applicant should apply the high emissions scenario (high impact, low likelihood) to those elements. Although the likelihood of this scenario is thought to be low, it is appropriate to take a more risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	The RCP8.5 scenario has been used to generate the UKCP18 climate projections used. As per the UKCP18 user guidance, this is the closest available model to the 'high emissions scenario' available within UKCP09, which were the latest available projections at the time of publication of the NPS EN-1. The UKCP18 climate projections are presented in Section 6.6 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1]. The ES methodology therefore demonstrates compliance with this policy.
Paragraph 4.8.10	If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the IPC should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	No consequential impacts have been identified as a result of climate change adaptation measures.
Paragraph 4.8.11	Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA.	Chapter 6: Climate Change of the ES [EN010106/APP/6.1] utilises the latest UK climate projections (UKCP18) to determine the historic and future baseline conditions. As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1], various GHG mitigation measures are embedded within the Scheme and are included within the Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). This embedded mitigation has been implemented to reduce the GHG impact of the Scheme. The Framework CEMP (Appendix 16D: Framework

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Construction Environmental Management Plan of the ES [EN010106/APP/6.2]) also includes various climate change resilience measures embedded within the Scheme. The EA has been consulted by the Applicant both as part of its Statutory Consultation and outside of the Statutory Consultation, including in a meeting between the Applicant and the Environment Agency on 16th April 2021. Relevant details of consultation and engagement are set out in Chapter 9: Flood Risk, Drainage and Water Resources of the ES [EN010106/APP/6.1] and the Consultation Report [EN010106/APP/5.1].
Paragraph 4.8.12	Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the IPC may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	No consequential adverse impacts on other aspects of the project and/or surrounding environment have been identified as a result of climate change adaptation measures.
NPS EN-3		
Paragraph 2.4.2	Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		and how the design process was conducted, including an explanation of rationale behind design decisions.
NPS EN-5		
Paragraph 2.3.4	If the IPC believes it needs to probe further then factors it may wish to consider include whether the project would make a significant contribution to the promotion of renewable energy, the achievement of climate change objectives, the maintenance of an appropriate level of security of electricity supply or whether it helps achieve other energy policy objectives.	Large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 2.4.1	Part 2 of EN-1 provides information regarding the Government's energy and climate change strategy including policies for mitigating climate change. Section 4.8 of EN-1 sets out the generic considerations that applicants and the IPC should take into account to help ensure that electricity networks infrastructure is resilient to climate change. As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: ▪ flooding, particularly for substations that are vital for the electricity transmission and distribution network; ▪ effects of wind and storms on overhead lines; ▪ higher average temperatures leading to increased transmission losses; and ▪ earth movement or subsidence caused by flooding or drought (for underground cables).	Relevant UKCP18 climate projections are presented in Section 6.6 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1]. Associated mitigation measures are outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1]. As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1], various climate change resilience measures are embedded within the Scheme and are included within the Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). The Scheme therefore shows resilience to the effects of climate change including higher average temperatures, and is therefore in compliance with this aspect of the policy. A Flood Risk Assessment (FRA) is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. The Scheme therefore demonstrates resilience to flooding and complies with this part of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
National Planning Policy Framework (NPPF)		
Paragraph 130	Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. As a result of this process a Scheme has been developed that is sensitive to local character and compliant with parts a), b), c) and d) of the policy. Chapter 15: Human Health of the ES [EN010106/APP/6.1] contains a Human Health and Wellbeing Assessment. This states that during construction and decommissioning, disruption some to NMU facilities is likely to lead to some severance between communities within the study area as NMUs are required to travel further to move between these communities. Due to the nature of the Scheme it does not include spaces which encourage social interaction. The Scheme is assessed to have a negative health impact on NMU in the construction period. However, the existence of alternative routes will however continue to allow movement between communities and disruption will be limited to periods of closure In addition, during the operational phase, the Scheme will provide additional facilities for pedestrians and other non motorised users (NMU) which will improve safety and reduce journey times for some of these. The Scheme is therefore expected to lead to a positive health and wellbeing impact during the operational phase. The Scheme therefore is considered to comply with part f) of the policy throughout the operational lifetime of the development. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The construction of the Scheme has also considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2])
Paragraph 131	Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.	The High Level Tree Constraints Report in Appendix 10B of the ES [EN010106/APP/6.2] and Figure 10-3 of the ES [EN010106/APP/6.3] identifies no ancient woodland or veteran trees within the Order limits. Prior to construction a detailed tree survey will be undertaken to confirm the status of trees affected by the Scheme. The CEMP, to be secured through a requirement of the DCO, will include specific tree protection measures to be implemented, including fencing and construction exclusion zones. The Scheme therefore shows full accordance with this policy.
Paragraph 132	Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot	In accordance with this policy, as outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Design and Access Statement [EN010106/APP/7.3] and the Consultation Report [EN010106/APP/5.1] accompanying the DCO application explain the design development process and the input that stakeholders had into this in detail, demonstrating compliance with the objectives of this policy.
Paragraph 134	Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.	integrated and responsive design which has been informed by stakeholder engagement. As demonstrated in the local policy section of this Accordance Table below, the Scheme has taken into account local design policy during the development of the design. The Scheme is therefore in compliance with this part of the policy. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design.
Paragraph 152	The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.	Large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved. The Scheme is therefore fully supported by this policy. As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1] , various GHG mitigation measures are embedded within the Scheme and are included within the Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). This embedded mitigation has been implemented to reduce the GHG impact of the Scheme. The Framework CEMP (see Appendix 16C) also includes various climate change resilience measures embedded within the Scheme. Flood risk resilience is also discussed in Chapter 9 of the ES and the site-specific FRA (Appendix 9C of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates resilience to flood risk and climate change and accords with this part of the policy.
Paragraph 154	New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising	As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1] , various GHG mitigation measures are embedded

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	within the Scheme and are included within the Framework Construction Environmental Management Plan CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). This embedded mitigation has been implemented to reduce the GHG impact of the Scheme. The Scheme therefore demonstrates resilience to GHG emissions and complies with part b) of the policy. The Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]) also includes various climate change resilience measures embedded within the Scheme. The Scheme therefore demonstrates resilience to impacts arising from climate change and complies with part a) of the policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV2: Design	All development will be designed to a high quality, enhancing and complementing local distinctiveness and public amenity by relating well to existing features and introducing appropriate new designs. Design which fails to have regard to local context including architectural traditions and does not take advantage of opportunities to preserve, enhance or enrich the character, appearance and quality of an area will not be acceptable and planning applications will be refused.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to local context and in compliance with the policy. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design.
Policy ENV4: Energy and Water Efficiency and Renewable Energy in Construction	All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable.	The construction of the Scheme has considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the Framework CEMP (see

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Appendix 16C of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates compliance with this aspect of the policy. In addition, large scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. The Scheme therefore represents a significant contribution to the zero carbon hierarchy on a national scale.
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS4: Reduce Emissions, Mitigate and Adapt to future Climate Change	The Council will promote and encourage all development proposals to deliver high levels of building sustainability in order to avoid expansion of the districts ecological footprint and to mitigate against and adapt to climate change. All new development proposals will be required to demonstrate how it minimises resource consumption, minimises energy consumption compared to the current national and regional minimum requirements and how it is located and designed to withstand the longer term impacts of climate change..... Development must also seek to adapt to the negative impacts from climate change including change upon biodiversity by protecting the rural districts natural capital and applying an ecological network approach – re-enforcing and creating links between core areas of biodiversity. The Council will support the development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.....	The construction of the Scheme has considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates compliance with this aspect of the policy. A site-specific FRA has been prepared for the DCO site. This can be found in Appendix 9C of the ES EN010106/APP/6.2]. This demonstrates how the sequential test and exception test have been met, as well as outlining proposals for Sustainable Urban Drainage Systems (SuDS). The Scheme therefore complies with this part of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	The council will seek the implementation of Sustainable Urban Drainage Systems into all new developments where technically feasible.	
Policy CS5: Design Quality and Local Distinctiveness	All new development should be designed to a high quality and reinforce local distinctiveness. Design that does not demonstrate it has regard to local context and fails to enhance the character, appearance and environmental quality of an area will not be acceptable. Innovative design addressing sustainable design principles will be encouraged, if not detrimental to the character of the area. Regard should be taken of current good practice concerning design, and any local design guidance adopted by the Council.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to local context and in broad compliance with the policy to the extent that this is feasible, noting the acknowledgement in NPS EN-1 paragraph 5.9.8 that energy NSIP's are likely to have effects on the landscape. As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM2: Creating Places – Development Principles and Local Distinctiveness	Proposals for all development (including changes of use, shopfronts, and the display of advertisements) should, as appropriate: a. recognise and address the key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape/townscape character appraisal to demonstrate this;	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to local context and in compliance with this part a) of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	b. maintain or create a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded; c. preserve or enhance the setting of, or views into and out of, a Conservation Area; d. not involve the loss of gardens and important open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement; e. provide in line with national and detailed local policies (including policies in this Plan), open space, recreation, play and leisure facilities as appropriate; f. incorporate sustainable design and construction measures and energy efficiency measures as required by Policy DM7 of this Plan; g. taking mitigation measures into account, not affect adversely: i. the distinctive historic character and architectural or archaeological value of the area and/or building; ii. the urban form, including significant street patterns, individual or groups of buildings and open spaces; iii. important landscape characteristics and prominent topographical features; iv. sites, habitats, species and features of ecological interest; v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or vi. residential amenity; h. not site sensitive development where its users would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented; i. produce designs and layouts which are safe and take account of crime prevention, community safety and public health; j. produce designs that respect the character, scale, density and massing of the locality;	The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design, including identifying the key design constraints that have influenced the this evolution.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	k. produce designs that provide access for all, and that encourage the use of sustainable forms of transport through the provision of pedestrian and cycle links, including access to shops and community facilities; and l. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network; and m. where necessary, incorporate appropriate refuse and recycling facilities, compost bins, water butts and litter and dog waste bins.	
Policy DM7: Sustainable Design and Construction	All proposals for new development including the re-use or conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques.	The construction of the Scheme has considered the impacts of the resource use and climate change. Mitigation includes the use of lower carbon construction methods and the preparation of a Construction Resource Management Plan to ensure recycling and reuse of materials is maximised. Measures are detailed in the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates compliance with the sustainable design aspect of the policy.
Policy DM8: Low and Zero Carbon Energy Generation	All proposals for generation or recovery of low carbon or renewable energy, such as wind turbines, biomass, and combined heat and power, will be encouraged subject to the following criteria: a. proposals will be required to demonstrate the new carbon saving benefit that they will create, taking into account both carbon dioxide savings from renewable energy generation and any additional carbon dioxide generation that results from the proposal; b. proposals will be required to include a landscape and visual assessment which should, where appropriate: i. show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact; ii. include mitigation measures to address the visual impact of the scheme;	Chapter 6: Climate change of the ES [EN010106/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes that over its 40 year operational lifetime the Scheme will produce 23,157,296 MWh of electricity with an average operational greenhouse gas intensity of 2.9 grams of carbon dioxide equivalent per kWh (gCO₂e/kWh). This demonstrates its very low carbon attributes compared to other non renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate. The Scheme therefore accords with part a) of the policy. Furthermore, Chapter 6: Climate change of the ES [EN010106/APP/6.1] acknowledges that it is likely that the land use change associated with the conversion of arable land to grassland

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	iii. include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments; c. where appropriate the proposal includes provision for mitigation and compensation measures, such as habitat enhancement or relocation.	during its 40 year operation would have a beneficial greenhouse gas impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), as grassland has a higher carbon sequestration value than cropland. Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] includes a landscape and visual impact assessment which complies with part b) of the policy. Embedded design mitigation measures in relation to nature conservation are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], and described in further detail within the OLEMP (Appendix 10I: Outline Landscape and Ecology Management Plan of the ES [EN010106/APP/6.2], Framework CEMP (Appendix 16C: Framework Construction Environmental Management Plan of the Environmental Statement [EN010106/APP/6.2]), Framework OEMP (Appendix 16F: Framework Operational Environment Management Plan of the Environmental Statement [EN010106/APP/6.2]) and Framework DEMP (Appendix 16F: Framework Decommissioning Management Plan of the Environmental Statement [EN010106/APP/6.2]),. These include habitat avoidance, creation and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. The Scheme therefore accords with part c) of the policy.
Draft NPS EN-1		
Paragraph 4.9.5	In preparing measures to support climate change adaptation applicants should consider whether nature-based solutions could provide a basis for such adaptation. In addition to avoiding further GHG emissions when compared with some more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere.	Consideration has been given to incorporating nature-based climate change adaption into the Scheme, and proposals for SuDS have been included.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 4.9.8	Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time. Applicants should be able to demonstrate that proposals have a high level of climate resilience built-in from the outset. They should also be able to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	As stated in Chapter 6: Climate Change of the ES [EN010106/APP/6.1] of the ES, UK Climate Projections 2018 (UKCP18) data was obtained to determine the historic and future baseline conditions. Future climate change impacts are reviewed based on the UKCP18 projections. The Scheme therefore demonstrates compliance with this aspect of the policy. As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1], various climate change resilience measures are embedded within the Scheme and are included within the Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates a high level of climate resilience built-in from the outset, in line with this part of the policy.
Paragraph 5.3.4	All proposals for energy infrastructure projects should include a carbon assessment as part of their ES (See Section 4.2). This should include: - A whole life carbon assessment showing construction, operational and decommissioning carbon impacts - An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages - Measurement of embodied carbon impact from the construction stage - How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures - How operational emissions have been reduced as much as possible through the application of best available technology for that type of technology - Calculation of operational energy consumption and associated carbon emissions - Whether and how any residual carbon emissions will be (voluntarily) offset or removed using a recognised framework	In line with part a), b) and c) of the policy, whole-life carbon assessment of the Scheme, covering construction (including embodied carbon), operation (including GHG emissions associated with energy use) and decommissioning impacts, is presented in Section 6.8 of Chapter 6: Climate Change of the Environmental Statement [EN010106/APP/6.1], with a description of the methodology and approach taken provided in Section 6.4. As outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1] of the ES, various GHG mitigation measures are embedded within the Scheme and are included within the Framework Construction Environmental Management Plan (CEMP; outlined in Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). This embedded mitigation would reduce the GHG impact of the Scheme. The Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]) also includes various climate change resilience measures embedded within the Scheme. The Scheme therefore demonstrates compliance with parts d) and e) of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	h. Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	The operational impact of the Scheme is relatively small, and considered to be far outweighed by the overarching benefit of the Scheme to reduce energy production from fossil fuel sources. The Scheme therefore complies with parts e) and f) of the policy. Construction and operational GHG emissions have been compared to the relevant UK national carbon budgets in Section 6.8 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1]. As the assessment methodology uses the relevant UK national carbon budgets as a proxy for the global climate, the wider, cumulative perspective is considered to be covered by default. Undertaking an assessment of cumulative effects with other schemes is therefore not considered relevant or appropriate as the GHG emissions from the cumulative schemes also fall within the UK carbon budgets. It is therefore considered that the approach undertaken in the ES [EN010106/APP/6.1] accords with parts g) and h) of the policy.

Table 3 Planning policy relevant to landscape and visual effects

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 5.9.5	The applicant should carry out a landscape and visual assessment and report it in the ES. (See Section 4.2) A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1]. Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] outlines the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10D of the ES [EN010106/APP/6.2] sets out the relevant matters of these published assessments in detail. As demonstrated in the local policy sections of this Accordance Table below, the landscape and visual impact assessment has taken account of relevant policies in local development documents. The Scheme therefore demonstrates full compliance with the policy.
Paragraph 5.9.6	The applicant's assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1]. The Scheme therefore demonstrates full compliance with the policy.
Paragraph 5.9.7	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1]. This assessment includes light pollution effects on local amenity and nature conservation. The Scheme therefore demonstrates full compliance with the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.9.8	Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	These factors are presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] with section 10.6 explaining the landscape baseline. Tables 10.3 to Table 10.5 identify the sensitivity of the published landscape character types at national, county and neighbourhood levels as well as identifying the sensitivity of the 44 local landscape character areas (LLCA) and then the four Site level character areas defined by the Applicant following desk and field work. Further information is also provided in the figures [EN010106/APP/6.3] and appendices [EN010106/APP/6.2] supporting this chapter. The majority of the landscape character types identified have been considered to have medium to high sensitivity. The Scheme is therefore compliant with this part of the policy. As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme has therefore been designed to be sensitive to the local landscape, in compliance with this part of the policy.
Paragraph 5.9.9	National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decision. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.	As outlined in Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1], neither the study area, nor the DCO Site, is covered by any statutory landscape designations (e.g. National Parks or Areas of Outstanding Natural Beauty).

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Paragraph 5.9.12	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland.	As stipulated by this policy, Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] shows regard for nationally designated areas.
Paragraph 5.9.13	The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.	Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] states that the Scheme is not visible from any nationally designated landscape areas.
Paragraph 5.9.14	Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England or a local development plan in Wales has policies based on landscape character assessment, these should be paid particular attention. However, local landscape designations should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	In line with this policy, section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] outlines the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10D of the ES [EN010106/APP/6.2] sets out the relevant matters of these published assessments in detail. As outlined in Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1], neither the study area, nor the DCO Site, is covered by any statutory landscape designations. Relevant landscape planning designations, including locally important landscapes, have been reviewed as part of the baseline and the respective landscape character areas and characteristics have been assessed in the landscape assessment for all phases of the Scheme.
Paragraph 5.9.15	The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The IPC should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	The assessment presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] concludes that the Scheme would have temporary significant adverse effects on the landscape as a result of construction and decommissioning. Effects would be minimised where possible through measures set out in the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]) and Framework DEMP (see Appendix 16F

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		of the ES [EN010106/APP/6.2]) including hoardings for the protection of retained vegetation and offsetting construction in relation to tree protection areas. In terms of operational effects, the assessment concludes that the Scheme would introduce new land uses across the Sites and the introduction of an infrastructure character which would alter the 'open' character of the existing landscape. At year 1 there are no likely significant adverse effects on the national and county level landscape character types due to there being barely noticeable alterations to the key characteristics of these types with the exception of County landscape type 'Rolling Estate Chalklands'. This would experience partial loss to key characteristics as a result of the infrastructure introduced to all the Sites resulting in a moderate adverse effect, which would be significant. This would however be reduced at year 15 with the establishment of the landscape mitigation and the effect would not be significant. At the neighbourhood level, Freckenham rural 2 and Freckenham rural 3 landscape character types would experience moderate adverse effects which would be significant at year 1 and year 15 of operation due to the partial alteration to the character areas. This is as a result of the introduction of the Scheme at Sunnica East Site A and Sunnica East Site B. The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised and would be reversed following the 40 year operation period. The landscape character during operation would also benefit from the changes to the land cover via new planting and grassland in comparison to the current agricultural land use. In response to the Secretary of State's need to consider landscape harm versus benefits (including need) of energy NSIPs as required by this policy, the local landscape harm which is likely to occur

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		during the various phases of the Scheme is considered to be offset by the significant national benefits of the Scheme over its 40 year operational period, as outlined in detail in the Statement of Need [EN010106/APP/7.1] .
Paragraph 5.9.16	In reaching a judgment, the IPC should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the IPC considers reasonable.	The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised and would be reversed following the 40 year operation period. The landscape character during operation would also benefit from the changes to the land cover via new planting and grassland in comparison to the current agricultural land use. It is therefore considered that any adverse impact on the landscape will be capable of being reverse in a reasonable timescale. In response to the Secretary of State's need to consider landscape harm versus benefits (including need) of energy NSIPs , the local landscape harm which is likely to occur during the various phases of the Scheme is considered to be offset by the significant national benefits of the Scheme over its 40 year operational period, as outlined in detail in the Statement of Need [EN010106/APP/7.1].
Paragraph 5.9.17	The IPC should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation.	The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised and would be reversed following the 40 year operation period. The landscape character during operation would also benefit from the changes to the land cover via new planting and grassland in comparison to the current agricultural land use. The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included careful siting of the Scheme in the landscape by the structures being offset from pine lines, vegetation patterns and road networks. The Scheme is therefore considered to be designed

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		carefully and sensitively with regards to effects on the landscape and siting.
Paragraph 5.9.18	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.	The assessment of visual effects presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] concludes that the Scheme would have temporary significant adverse visual effects as a result of construction and decommissioning experienced by motorists, residents and users of PROWs with close views into the Sites and the Grid Connection Routes. Similar to landscape effects these would be minimised where possible through measures set out in the CEMP and DEMP including hoardings around construction works and keeping tidy and neat working areas. At year 1 of operation, 25 of the views would experience significant adverse effects. Two of these views would experience major adverse effects. These are Viewpoint 12: residents at Lee Farm who would experience extensive change in their view as a result of the introduction of Sunnica East Site A and Viewpoint 41: recreational users PROW (bridleway) 204/5, south-east of Snailwell who would experience extensive change in their view as a result of the introduction of Sunnica West Site A. The Scheme has incorporated a design strategy which has sought to minimise harm on the landscape and reduce adverse visual effects where possible. The assessment concludes that the effectiveness of this strategy means that, at year 15, only one representative view which is the recreational users and users of the training grounds at the Limekilns (Viewpoint 38) (see Figure 10-100 of the Environmental Statement [EN010106/APP/6.3]) would likely experience a moderate adverse effect which is considered to be significant. This is due to partial change to the composition of the

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		existing view. The view is an elevated position and the open character of the intervening foreground, which forms a part of the wider Gallops, means additional mitigation measures such as off-site planting is not considered to be practicable in retaining the equestrian land use across the Gallops. The view would also still retain views across to Sunnica West Site A due to its elevation. Additional mitigation for this effect is therefore not possible. It is not therefore considered that the limited and localised visual effects predicted would outweigh the national benefits of the Scheme, outlined in detail in the Statement of Need [EN010106/APP/7.1] . The Scheme therefore shows compliance with this policy.
Paragraph 5.9.21	Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.	The scale of the Scheme and its components is necessary to deliver the electricity generation output that it will produce. Having developed the design of the Scheme through an iterative design development process, as outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2] , and assessed the impacts of the Scheme in an EIA that is reported in the ES [EN010106/APP/6.1] , the Applicant considers that any further reduction in environmental impact resulting reduction in its scale would not warrant the loss of electricity generation output and the contribution that would make to the achievement of the Government's objectives and commitments to the energy system and combating climate change.
Paragraph 5.9.22	Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration.	The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area: a. Careful siting of the Scheme in the landscape by the structures being setback from residential receptors and offset from pine lines, vegetation patterns and road networks;

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		b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the landscape structure and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington. The Scheme is therefore considered to be designed carefully and sensitively with regards to effects on the landscape and siting.
Paragraph 5.9.23	Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.	No offsite landscaping is required or proposed.
NPS EN-5		
Paragraph 2.2.5	There will usually be some flexibility around the location of the associated substations and applicants will give consideration to how they are placed in the local landscape taking account of such things as local topography and the possibility of screening. See Section 2.8 below and Section 5.9 in EN-1.	The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area: a. Careful siting of the Scheme in the landscape by the structures being setback from residential receptors and offset from pine lines, vegetation patterns and road networks; b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland,

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		hedgerows and native grassland to improve the landscape structure and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington. d. External appearance of buildings have been designed to be in keeping with the local area. This has been secured through the Outline LEMP at Appendix 10I of the ES [EN010106/APP/6.2] and detailed design approval as outlined in the Draft DCO [EN010106/APP/3.1]. The Scheme is considered to be designed carefully and sensitively with regards to siting, ensuring that landscape impacts are minimised. Chapter 4: Alternatives of the ES [EN010106/APP/6.1] outlines the alternative locations considered for the Burwell substation.
Paragraph 2.8.9	The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider: the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads);	Both Grid Connection Route A and Grid Connection Route B are proposed to be below ground. No new overhead lines are proposed. The ES [EN010106/APP/6.1] takes account of proposed cables and connections in its assessments.

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	- the additional cost of any undergrounding or sub-sea cabling (which experience shows is generally significantly more expensive than overhead lines, but varies considerably from project to project depending on a range of factors, including whether the line is buried directly in open agricultural land or whether more complex tunnelling and civil engineering through conurbations and major cities is required. Repair impacts are also significantly higher than for overhead lines as are the costs associated with any later uprating.); and - the environmental and archaeological consequences (undergrounding a 400kV line may mean disturbing a swathe of ground up to 40 metres across, which can disturb sensitive habitats, have an impact on soils and geology, and damage heritage assets, in many cases more than an overhead line would).	
National Planning Policy Framework (NPPF)		
Paragraph 130	Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport	The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area: a. Careful siting of the Scheme in the landscape by the structures being setback from residential receptors and offset from pine lines, vegetation patterns and road networks; b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the

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	networks; and f) create places that are safe, inclusive and accessible and which promote health well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	landscape structure and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington. d. External appearance of buildings have been designed to be in keeping with the local area. This has been secured through the Outline LEMP at Appendix 101 of the ES [EN010106/APP/6.2] and detailed design approval as outlined in the Draft DCO [EN010106/APP/3.1]. It is therefore considered that the Scheme has been designed using appropriate and effective landscaping that is sympathetic to local character and minimises potential landscape impacts.
Paragraph 174	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; 	The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area: a. Careful siting of the Scheme in the landscape by the structures being offset from pine lines, vegetation patterns and road networks; b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the landscape structure and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington. d. External appearance of buildings have been designed to be in keeping with the local area. This has been

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		secured through the Outline LEMP at Appendix 10I of the ES [EN010106/APP/6.2] and detailed design approval as outlined in the Draft DCO [EN010106/APP/3.1]. Section 8.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] confirms that no sites of biodiversity or geological value and soils are affected by the Scheme. Section 10.7 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] explains further the specific design and mitigation measures integral to the Scheme. The mitigation design would be secured through an OEMP and the LEMP to be approved and implemented through requirements of the DCO prior to construction. A Framework OEMP is provided at Appendix 16F of the ES [EN010106/APP/6.2] and an OLEMP is provided at Appendix 10I of the ES [EN010106/APP/6.2]. Appendix 12B: Soils and Agriculture Baseline Report of the ES [EN010106/APP/6.2] identifies the various grades of agricultural land across the Sites as a result of soil surveys undertaken. It explains that 96% of the land within the Sites falls within grade 3b, 4 and 5 with some non-agricultural land uses also present. The Scheme's location maximises the use of poorer quality agricultural land and will not result in the permanent loss of BMV land due to the Scheme being decommissioned following 40 years of operation. Agricultural use of the land will continue, with sheep grazing proposed. Leaving the land fallow for 40 years will also provide benefits in terms of improving soil quality which the ES identifies is a significant beneficial effect of the Scheme. None of the sites for the BESS or compounds will fall within BMV land. The land resource that is to house the solar infrastructure will

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		not be lost or degraded, because the soil resource will remain in an undisturbed state below and between solar panels, with a forage crop. The Scheme is therefore considered to be designed carefully and sensitively with regards to siting, ensuring that landscape impacts and impacts on best and most versatile agricultural land are minimised where possible and protecting the local landscape in accordance with this policy.
Paragraph 176	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	As outlined in Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1], neither the study area, nor the DCO Site, is covered by any statutory landscape designations (e.g. National Parks or Areas of Outstanding Natural Beauty).
East Cambridgeshire District Council Local Plan Adopted April 2015.		
Policy ENV1: Landscape and Settlement Character	Proposals for development should be informed by, be sympathetic to, and respect the capacity of the distinctive character areas defined in the Cambridgeshire Landscape Guidelines. Development proposals should demonstrate that their location, scale, form, design, materials, colour, edge treatment and structural landscaping will create positive, complementary relationships with existing development and will protect, conserve, and where possible enhance: The pattern of distinctive historic and traditional landscape features, such as watercourses, characteristic vegetation, individual and woodland trees, field patterns, hedgerows and	Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] outlines the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10D of the ES [EN010106/APP/6.2] sets out the relevant matters of these published assessments in detail, including the character areas defined in the Cambridgeshire Landscape Guidelines. The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character. Mitigation has been provided, to

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	walls, and their function as ecological corridors for wildlife dispersal. · The settlement edge, space between settlements, and their wider landscape setting. · Visually sensitive natural and man-made skylines, hillsides and geological features. · Key views into and out of settlements; this includes quintessential views of Ely Cathedral and the setting of the City as a historic 'isle' settlement close to the fen edge and the valley of the River Great Ouse. · The unspoilt nature and tranquillity of the area. · Public amenity and access; and · Nocturnal character of rural areas free from light pollution. Suitable compensatory provision must be made in the event of significant harm where necessary.	ensure that landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area. Hedgerows have been retained and are enhanced where practicable and where temporary removal is required to facilitate construction of the Grid Connection Routes, these will be reinstated. Chapter 8, Ecology, of the ES [EN010106/APP/6.1], assesses the impact of the Scheme on wildlife. Key views into and out of settlements, as detailed in the policy, will not be affected. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRowS during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. The Scheme therefore will minimise disruption in terms of public amenity and access.
Policy ENV2: Design	All development will be designed to a high quality, enhancing and complementing local distinctiveness and public amenity by relating well to existing features and introducing appropriate new designs. Design which fails to have regard to local context including architectural traditions and does not take advantage of opportunities to preserve, enhance or enrich the character, appearance and quality of an area will not be acceptable and planning applications will be refused. The Council will prepare and adopt development frameworks to guide the development of key sites. Developers will be required to prepare detailed Masterplans for these sites, and for other large-scale developments and developments in sensitive areas, and submit these alongside an outline or initial application. In	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2], the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to local context and in compliance with the policy. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design.

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	addition to key design principles, masterplans should include details on infrastructure delivery and phasing. Design codes will be required for certain proposals and should be submitted for approval between outline and reserved matters application stages.	
Policy ENV6: Renewable Energy Development	Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to: · The local environment and visual landscape impact. · Impact on the character and appearance of the streetscape/buildings. · Key views, in particular those of Ely Cathedral. · Residential amenity.	The Scheme has incorporated a design strategy which has sought to minimise harm on the landscape and reduce adverse visual effects where possible. The assessment concludes that the effectiveness of this strategy means that, at year 15, only one representative view which is the recreational users and users of the training grounds at the Limekilns (Viewpoint 38) (see Figure 10-100 of the Environmental Statement [EN010106/APP/6.3]) would likely experience a moderate adverse effect which is considered to be significant. This is due to partial change to the composition of the existing view. The view is an elevated position and the open character of the intervening foreground, which forms a part of the wider Gallops, means additional mitigation measures such as off-site planting is not considered to be practicable in retaining the equestrian land use across the Gallops. The view would also still retain views across to Sunnica West Site A due to its elevation. Additional mitigation for this effect is therefore not possible. As concluded by Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1], none of the residential receptors assessed within the LVIA are predicted to experience a significant adverse effect at year 15. It is not therefore considered that the limited and localised visual effects predicted would outweigh the national benefits of the Scheme, and it is considered therefore that the Scheme complies with the policy.

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Policy ENV11: Conservation Areas	Development proposals, within, or affecting a Conservation Area should: · Be of a particularly high standard of design and materials in order to preserve or enhance the character or appearance of the area.	Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms. As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2] , the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Scheme is therefore sensitive to local context and is not assessed to have a significant adverse effect on any Conservation Areas.
Policy COM5: Strategic Green Infrastructure	Proposals which would cause loss of or harm to existing strategic green infrastructure will not be permitted, unless the need for and benefits of the development demonstrably and substantially outweigh any adverse impacts on the green infrastructure.	The Scheme is not anticipated to cause loss of or harm to existing strategic green infrastructure.
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS2: Natural Environment	Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures. Links between such areas will also be sought. Measures will include: ▪promotion of Green Infrastructure enhancement and/or provision on all new developments;	The likely significant effects of the Scheme on landscape, biodiversity and geodiversity have been assessed by the ES [EN010106/APP/6.2] , including in Chapter 10: Landscape and Visual Amenity and Chapter 8: Ecology . These identify that the Scheme includes the provision and enhancement of green infrastructure, including substantial of new and infilled hedgerow, and woodland planting, in accordance with the first bullet-point of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	•using Landscape Character Assessment (LCA) to inform development decisions within the District; •promotion of green corridor enhancement, such as improvement projects along the River Lark and Icknield Way; and promotion of agri-environment schemes which increase the landscape, historic and wildlife value of farmland, increase appropriate public access and reduce diffuse pollution... Where mitigation measures are employed they will result in a net gain of biodiversity for the District. Proposals should also seek to incorporate: •adequate and appropriate landscaping and natural areas informed by Landscape Character Assessment; and •increased public access to the countryside through green corridors, these should create convenient and attractive links and networks between development and the surrounding area...	In accordance with the second and fifth bullet-points, Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] outlines the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10D of the ES [EN010106/APP/6.2] sets out the relevant matters of these published assessments, which have informed the development of the Scheme including its embedded mitigation, in detail. In accordance with the third bullet-point, hedgerow and woodland planting are included as part of the Scheme. These will contribute to the creation of green corridors. In addition, native grassland and native wetland planting will increase the wildlife value of the land within Order Limits. Permissive paths are also included within the Scheme, allowing appropriate public access in line with bullet points three and six of the policy. As per the fourth bullet-point, the Scheme will deliver a substantial biodiversity net gain; and the mitigation proposed has been informed by the assessments undertaken.
Policy CS3: Landscape Character and the Historic Environment	The quality, character, diversity and local distinctiveness of the District's landscape and historic environment shall be protected, conserved and, where possible, enhanced. Proposals for development will take into account the local distinctiveness and sensitivity to change of distinctive landscape character types, and historic assets and their settings. Landscape types are described in the Forest Heath Landscape Character Assessment (LCA). The Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall landscape character, taking account of the key characteristics and distinctiveness of the landscape and the landscape setting of settlements.	Section 10.6 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] outlines the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10D of the ES [EN010106/APP/6.2] sets out the relevant matters of these published assessments in detail. Note that the Forest Heath LCA has been replaced by the Suffolk LCA, which has been taken into account in the assessment contained in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1].

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy CS5: Design Quality and Local Distinctiveness	All new development should be designed to a high quality and reinforce local distinctiveness. Design that does not demonstrate it has regard to local context and fails to enhance the character, appearance and environmental quality of an area will not be acceptable. Innovative design addressing sustainable design principles will be encouraged, if not detrimental to the character of the area. Regard should be taken of current good practice concerning design, and any local design guidance adopted by the Council.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2] , the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design and the design principles which will underpin its development.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM2: Creating Places – Development Principles and Local Distinctiveness	Proposals for all development (including changes of use, shopfronts, and the display of advertisements) should, as appropriate: a. recognise and address the key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape/townscape character appraisal to demonstrate this; b. maintain or create a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded; c. preserve or enhance the setting of, or views into and out of, a Conservation Area; d. not involve the loss of gardens and important open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement; e. provide in line with national and detailed local policies (including policies in this Plan), open space, recreation, play and leisure facilities as appropriate;	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2] , the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	f. incorporate sustainable design and construction measures and energy efficiency measures as required by Policy DM7 of this Plan; g. taking mitigation measures into account, not affect adversely: i. the distinctive historic character and architectural or archaeological value of the area and/or building; ii. the urban form, including significant street patterns, individual or groups of buildings and open spaces; iii. important landscape characteristics and prominent topographical features; iv. sites, habitats, species and features of ecological interest; v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or vi. residential amenity; h. not site sensitive development where its users would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented; i. produce designs and layouts which are safe and take account of crime prevention, community safety and public health; j. produce designs that respect the character, scale, density and massing of the locality; k. produce designs that provide access for all, and that encourage the use of sustainable forms of transport through the provision of pedestrian and cycle links, including access to shops and community facilities; and l. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network; and m. where necessary, incorporate appropriate refuse and recycling facilities, compost bins, water butts and litter and dog waste bins.	

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy DM5: Development in the Countryside	Areas designated as countryside will be protected from unsustainable development. Proposals for economic growth and expansion of all types of business and enterprise that recognises the intrinsic character and beauty of the countryside will be permitted where: • it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a); • there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests; and • there will be no significant adverse impact on the local highway network	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. Appendix 12B: Soils and Agriculture Baseline Report of the ES [EN010106/APP/6.2] identifies the various grades of agricultural land across the Sites as a result of soil surveys undertaken. It explains that 96% of the land within the Sites falls within grade 3b, 4 and 5 with some non agricultural land uses also present. The Scheme's location maximises the use of poorer quality agricultural land and will not result in the permanent loss of BMV land due to the Scheme being decommissioned following 40 years of operation. Agricultural use of the land will continue, with sheep grazing proposed. Leaving the land fallow for 40 years will also provide benefits in terms of improving soil quality which the ES identifies is a significant beneficial effect of the Scheme. Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. The assessment in Chapter 8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] of the likely significant impacts of the Scheme on designated ecological sites concludes that there are no potential

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		significant adverse effects as a result of the construction or operation of the Scheme on these sites. Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme.
Policy DM8: Low and Zero Carbon Energy Generation	All proposals for generation or recovery of low carbon or renewable energy, such as wind turbines, biomass, and combined heat and power, will be encouraged subject to the following criteria: b. proposals will be required to include a landscape and visual assessment which should, where appropriate: i. show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact; ii. include mitigation measures to address the visual impact of the scheme; iii. include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments; c. where appropriate the proposal includes provision for mitigation and compensation measures, such as habitat enhancement or relocation.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out in accordance with the requirements of this policy and is presented in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1]. This includes mitigation measures that address the visual impact of the Scheme.
Policy DM13: Landscape Features	Development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value. All proposals for development should be informed by, and be sympathetic to, the character of the landscape. Landscape Character Types are identified in the Suffolk Landscape Character Assessment. However, the 'Type' boundaries are only indicative, being	The Scheme has incorporated a design strategy which has sought to minimise harm on the landscape and reduce adverse visual effects where possible. The assessment concludes that the effectiveness of this strategy means that, at year 15, only one representative view which is the recreational users and users of the training grounds at the Limekilns (Viewpoint 38) (see Figure 10-100 of the Environmental Statement [EN010106/APP/6.3]) would likely experience a moderate adverse effect which is considered to be

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	mapped for the whole county at a scale of 1:50,000. Therefore, the character of the site and setting of a proposal should be individually assessed. All development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape. Developers/applicants will be required to submit, where appropriate, landscaping schemes with applications for planning permission and for the approval of reserved matters. Where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations. However, it is essential that commensurate provision must be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features. Where this is not possible development will not be permitted.	significant. This is due to partial change to the composition of the existing view. The view is an elevated position and the open character of the intervening foreground, which forms a part of the wider Gallops, means additional mitigation measures such as off-site planting is not considered to be practicable in retaining the equestrian land use across the Gallops. The view would also still retain views across to Sunnica West Site A due to its elevation. Additional mitigation for this effect is therefore not possible. It is not therefore considered that the limited and localised visual effects predicted would outweigh the national benefits of the Scheme, and therefore the landscape impacts of the Scheme are not considered to be unacceptable. Chapter 10: Landscape and Visual Impact has considered the Landscape Character Types identified by the Suffolk Landscape Character Assessment as well as local landscape character areas (including at the site level) identified by the Applicant following desk study and site visits. Section 10.7 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] explains further the specific design and mitigation measures integral to the Scheme. The mitigation design would be secured through an OEMP and the LEMP to be approved and implemented through requirements of the DCO prior to construction. A Framework OEMP is provided at Appendix 16F of the ES [EN010106/APP/6.2] and an OLEMP is provided at Appendix 10I of the ES [EN010106/APP/6.2].
Policy DM44: Rights of Way	Development which would adversely affect the character of, or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist, or horse rider use.	Three PRoWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. there is PRoW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west and an unclassified road (U6006), which is a publicly

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Improvements to such rights of way will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate and to achieve the objectives of the Suffolk Rights of Way Improvement Plan.	accessible route, including for equestrians, extends northwards from Elms Road to Worlington. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRoWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. The Scheme also proposes enhancement measures which include three permissive routes which are identified in Appendix 13B: Transport Assessment of this Environmental Statement [EN010106/APP/6.2] which will result in minor benefits to NMUs in the long term. The Scheme therefore does not lead to significant adverse effect to PRoWs during the construction, operation or decommissioning of the Scheme and as such is considered to be compliant with this policy.
Fordham Neighbourhood Plan (made December 2018)		
Policy 2: Character and Design	Development proposals must deliver high quality design through: a. Delivering a quantum of development that is appropriate for the site, taking into account the site size and shape, making the best use of the site given its context; b. Responding to key features on the site such as trees, topography, and buildings and retaining them as part of the scheme wherever possible; c. Responding to important characteristics of the surrounding area including views, buildings and their materials and design features, building heights, space between buildings, heritage assets, and trees;	The Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The Design and Access Statement [EN010106/APP/7.3] accompanying the DCO application explains the evolution of the design. The relevance of this policy relates to the fact that Grid Connection Route B crosses the southern extent of Fordham Parish, as such there are no visual impacts arising once the cable corridor has been installed. Furthermore, restoration of hedgerows along Grid Connection Route B is supported by this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	d. Introducing visual interest from the surrounding area through the overall design, orientation and position of buildings, architectural details, landscaping and materials, particularly when viewed from publicly accessible areas; e. Providing a mix of dwelling styles and sizes where appropriate; f. Ensure the height of new development is reflective of the low (two storeys or fewer) character of present development in the village; g. Including a robust green landscaping scheme that is appropriate for the site and links well with surrounding green infrastructure; h. Providing adequate amenity space for future occupiers of the proposals; i. Not resulting in unacceptable impacts on the amenity of occupants of neighbouring or nearby properties; j. Providing buildings and spaces that are accessible, inclusive and safe; and k. Using high quality materials throughout the scheme. Proposals that exhibit substandard design quality, particularly when considered against these requirements, will not be supported. Plans and supporting statements submitted with planning applications should make clear how decisions on the design of the proposal were arrived at and why they are appropriate for the context of the site. Development that exhibits outstanding or innovative design will be supported in principle, where this is appropriate for the context of the site.	
Policy 6: Locally Important Views defined in the Plan	The following views are designated as Locally Important Views: • FV01 – View of St Peter and Mary Magdalene Church south-west from Mildenhall Road • FV02 – View south along Mill Lane from outside number 2 Mill Lane	The Scheme is not anticipated to affect any of the views designated as Locally Important Views in this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	• FV03 – View north to Poet’s Cottage including the River Snail from the bridge on Carter Street • FV04 – View north on Mill Lane of Brook House • FV05 – Views of St Peter and Mary Magdalene Church from public rights of way on Fordham Moor • FV06 – View west along Carter Street to The Chequers and the Pound • FV07 – View northwest to water tower from public right of way • FV08 – View west along Carter Street/Church Street to 1 Carter Street, Victoria Hall and neighbouring buildings Development proposals should not obstruct or detract from a Locally Important View. Any proposals that has potential to impact on these views should be accompanied by supporting information to demonstrate why the proposal will not have a negative impact on the view	
Newmarket Neighbourhood Plan (made 2019)		
Policy NKT2: Key Views	a. Development proposals in the Conservation Area should take account of and where possible complement the views and glimpses identified in the Newmarket Conservation Area Appraisal (2009), which contribute to the appreciation of the visual qualities of the Conservation Area and its valued surrounding landscape. b. As appropriate to their nature and location, development proposals should take account of the following Key Views as identified on Policies Map 4. In particular, development proposals should be designed in such a fashion that their height, scale, mass and location within the site concerned respects and safeguards the identified Key Views. Proposals which would complement an identified Key View will be particularly supported.	The Scheme is not anticipated to affect any of the views designated as Key Views in this policy.
Draft NPS EN-1		
Paragraph 5.10.8	The assessment should also demonstrate how noise and light pollution from construction and operational activities on	Mitigation measures are set out in section 10.7 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1].

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	residential amenity and on sensitive locations, receptors and views, will be minimised.	Whilst no offsite planting is proposed; localised onsite planting has been suggested where this will help to mitigate effects to receptors. Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2]. During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers.
Paragraph 5.10.10	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	The Applicant's approach to this in developing the embedded mitigation and enhancement within the scheme design is set out in section 10.7 of Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1]. LEMPs will be produced in detailed design, which must be in compliance with the submitted OLEMP at Appendix 10I of the ES.

Table 4 Planning policy relevant to cultural heritage

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 5.8.2	The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora. Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called "heritage assets". A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.	Heritage assets as defined in this policy have been considered and where relevant assessed in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the significance of these assets. The ES [EN010106/APP/6.1] has therefore identified a suitable baseline from which to assess the Scheme in relation to this policy.
Paragraph 5.8.3	Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: a World Heritage Site; Scheduled Monument; Protected Wreck Site; Protected Military Remains, Listed Building; Registered Park and Garden; Registered Battlefield; Conservation Area; and Registered Historic Landscape (Wales only)	Designated heritage assets are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the significance of these assets. Designated heritage assets that are affected by the Scheme include Scheduled Monuments, Listed Buildings, a Registered Park and Garden and Conservation Areas. There are no World Heritage Sites; Protected Wreck Sites; Protected Military Remains, Registered Battlefields within or close to the Order limits and so the Scheme does not affect these types of designated assets. The ES [EN010106/APP/6.1] has therefore identified a suitable baseline from which to assess the Scheme in relation to this policy.
Paragraph 5.8.4	There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include: • those that have yet to be formally assessed for designation;	Non designated heritage assets with archaeological interest are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes these assets and their significance. The assessment concludes

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	- those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and - those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.	that no non designated heritage assets of schedulable quality will be harmed by the Scheme.
Paragraph 5.8.5	The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the IPC indicates to it that a nondesignated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets.	Non designated heritage assets with archaeological interest are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes these assets and their significance. The assessment concludes that no non designated heritage assets of schedulable quality will be harmed by the Scheme.
Paragraph 5.8.6	The IPC should also consider the impacts on other non-designated heritage assets, as identified either through the development plan making process (local listing) or through the IPC's decision making process on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions, even though those assets are of lesser value than designated heritage assets.	Non designated heritage assets are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes these assets and their significance. Impacts on non designated heritage assets are presented in Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. The ES [EN010106/APP/6.1] therefore considers impacts on non-designated heritage assets as required by this policy.
Paragraph 5.8.8	As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes these assets (having considered the HER and through the Applicant's own assessment) and their significance, and the contribution of their setting to that significance. The ES [EN010106/APP/6.1] is therefore in full compliance with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.8.9	Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.	The Applicant has undertaken desk based assessment and extensive field evaluation in the form of geophysical surveys and trial trenching. Visualisations have been prepared to also assess impacts on setting. These are shown in Figures 10-90 to 10-102 provided at Volume 3 of the ES [EN010106/APP/6.3]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the fieldwork undertaken and desk based assessments are provided at Appendix 7C to 7E of the ES [EN010106/APP/6.2]. It is concluded that there are no heritage assets with an archaeological interest within the study area. The ES [EN010106/APP/6.1] is therefore in full compliance with this policy.
Paragraph 5.8.10	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.	Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the heritage assets within the study area for the Scheme and their significance. and the contribution of their setting to that significance. Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage. The ES [EN010106/APP/6.1] is therefore in full compliance with this policy.
Paragraph 5.8.12	In considering the impact of a proposed development on any heritage assets, the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets, including their value. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The very low and low harm arising from the Scheme is considered to be outweighed by the detailed compelling case for why the Scheme is urgently required and at the scale proposed as presented in the Statement of Need [EN010106/APP/7.1].
Paragraph 5.8.13	The IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution to their settings and the positive contribution they can make to sustainable communities and economic vitality. The IPC should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use. The IPC should have regard to any relevant local authority development plans or local impact report on the proposed development in respect of the factors set out in footnote 122.	The Scheme design includes a number of cultural heritage enhancement measures which can be found in Section 7.6 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. These include: a. Sensitive screening to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. The proposed mitigation planting has also taken into consideration the surrounding landscape character and focuses on the enhancement of existing vegetation. b. Significant setbacks and buffer zones from settlements are proposed to ensure that settlements remain isolated within the landscape. c. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure. In addition to the proposed mitigation strategy, the Scheme is proposed to be operational for 40 years with its decommissioning secured through a DCO requirement. There will therefore be no permanent loss of the significance of designated assets as a result of the Scheme allowing future generations to retain an understanding of their settings. A benefit of the Scheme will also be to take one of the Scheduled Monuments out of agricultural use thereby reducing plough damage to this asset during the operation of the Scheme. It is therefore considered that a number of cultural heritage assets have been enhanced by the Scheme and this should be considered in the planning balance as stipulated in this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.8.14	There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. The Scheme therefore does not lead to substantial harm to any designated heritage asset or have any direct adverse effects to designated heritage assets, meaning the Scheme is in accordance with this policy.
Paragraph 5.8.15	Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. The Scheme therefore does not lead to substantial harm to or loss of significance of any designated heritage asset, according with this part of the policy. Mitigation and enhancement incorporated into the Scheme design minimises the harm to the setting of all designated assets as far as possible. This includes: Sensitive screening to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. The proposed

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		mitigation planting has also taken into consideration the surrounding landscape character and focuses on the enhancement of existing vegetation. b. Significant setbacks and buffer zones from settlements are proposed to ensure that settlements remain isolated within the landscape. c. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure. In addition to the proposed mitigation strategy, the Scheme is proposed to be operational for 40 years with its decommissioning secured through a DCO requirement. There will therefore be no permanent loss of the significance of designated assets as a result of the Scheme allowing future generations to retain an understanding of their settings. A benefit of the Scheme will also be to take one of the Scheduled Monuments out of agricultural use thereby reducing plough damage to this asset during the operation of the Scheme. The Statement of Need [EN010106/APP/7.1] explains in detail the compelling case for the Scheme in relation to urgently delivering low carbon renewable energy to meet the aim of decarbonising the UK's electricity supplies by 2050; providing security of supply as well as affordability for end consumers. It is considered that any less than substantial harm caused to a designated heritage asset is outweighed by this urgent national need.
Paragraph 5.8.16	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The policies set out in paragraphs 5.8.11 to 5.8.15 above apply to those elements that do contribute to the significance. When considering proposals the IPC should take into account the relative significance of the element affected and its contribution to the	There are no World Heritage Sites affected by the Scheme. Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	significance of the World Heritage Site or Conservation Area as a whole.	Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms. The Scheme therefore does not lead to significant adverse effects to a World Heritage Site of Conservation Area and complies with this policy.
Paragraph 5.8.17	Where loss of significance of any heritage asset is justified on the merits of the new development, the IPC should consider imposing a condition on the consent or requiring the applicant to enter into an obligation that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. The Scheme therefore does not lead to substantial harm to or loss of significance of any designated heritage asset, as such no such condition is necessary for this Scheme.
Paragraph 5.8.18	When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to these designated assets or their setting. With regard to the Four bowl barrows north of the A11/A14 junction Scheduled Monument, as this asset is within the Order limits but outside the area in which any panels, substation, BESS, compound, cable or other infrastructure is to be constructed or installed (i.e. the developable area) it is considered that the operation of the Scheme will bring protection to the barrows from the potential for further plough damage as the land within which they are located is currently in agricultural use.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		This represents a positive contribution to this designated heritage asset and it is considered that this should be taken into account in the planning balance.
Paragraph 5.8.19	A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to these designated assets.
Paragraph 5.8.20	Where the loss of the whole or a material part of a heritage asset's significance is justified, the IPC should require the developer to record and advance understanding of the significance of the heritage asset before it is lost. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Developers should be required to publish this evidence and deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it.	The Scheme will not result in physical impacts on any designated heritage asset. As set out in Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1], a programme of archaeological investigation will be undertaken and appropriate mitigation and recording applied to archaeological resource identified as part of a Detailed Archaeological Mitigation Strategy to be agreed with stakeholders.
Paragraph 5.8.21	Where appropriate, the IPC should impose requirements on a consent that such work is carried out in a timely manner in accordance with a written scheme of investigation that meets the requirements of this Section and has been agreed in writing with the relevant Local Authority (where the development is in English waters, the Marine Management Organisation and English Heritage, or where it is in Welsh waters, the MMO and Cadw)) and that the completion of the exercise is properly secured.	Trial trench evaluation works have taken place and are being finalised at the time of the DCO Application. Mitigation measures are proposed in Chapter 7: Cultural Heritage of this Environmental Statement [EN010106/APP/6.2]. Having consulted the Local Authority on the findings of the pre-application evaluation, further appraisal is proposed after the DCO is made, as set out by Requirement 13 of the draft DCO [EN010106/APP/3.1].
Paragraph 5.8.22	Where the IPC considers there to be a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the IPC should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	Design mitigation is proposed to minimise the direct physical impact upon the non designated assets already identified and any yet undiscovered remains during construction. This includes: a. avoiding areas of significant archaeological potential. Whilst as a result of the extensive field work to date these areas have been avoided, flexibility is built into the Scheme design

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		as shown on the Works Plans [EN010106/APP/2.1]. There are therefore options for alterations to construction methodology or placement of panels and infrastructure if through any remaining field evaluation significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of these assets. b. minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains; and c. installing buffer zones, where practical, around any sensitive areas during construction. Where the above design mitigation cannot be applied to the management of the archaeological resource, it is proposed that: a. A programme of archaeological fieldwork and recording will be implemented for archaeological remains within the footprint of the Scheme. Any excavation work will be targeted upon those assets that would maximise knowledge gain in order to answer Scheme and site-specific research questions. Some sites may only warrant further investigation, rather than full-scale excavation. b. Where non-intrusive trenching methods are required for cable routes, a strategy will be developed which will detail the monitoring of this, and it will include an action plan detailing the required mitigation in the event that there is any breakout in the vicinity of known archaeological remains. Where non-intrusive methods are not possible, archaeological strip, map and record excavation will be carried out. c. Archaeological mitigation fieldwork will be undertaken prior to construction works, pursuant to a DCO Requirement. The mitigation requirements are set out in the Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2] submitted as part of the DCO application and this will be secured with

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		a detailed CEMP being a requirement of the DCO prior to construction commencing. d. There will be consultation and agreement of the archaeological mitigation strategy with SCC and CCC archaeologists. A specific requirement relating to the agreement and implementation of these is provided for in the draft Development Consent Order [EN010106/APP/3.1]. It is therefore considered that appropriate procedures are in place for the identification and treatment of undiscovered heritage assets discovered during construction, in compliance with the policy.
National Planning Policy Framework (NPPF)		
Paragraph 194	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	Designated and non-designated heritage assets within the study area are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the significance of these assets. The ES [EN010106/APP/6.1] is therefore in accordance with this part of the policy. The assessment contained within Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] draws upon historic environment desk-based assessments produced for the Scheme in 2018 and updated in 2021 (Appendices 7C, 7D and 7E of the ES [EN010106/APP/6.2]). Historic Landscape Characterisation (HLC) data is not available from the Cambridgeshire Historic Environment Record (HER). In its absence, an analysis of historic mapping and other available data has identified three distinct character areas across the Order limits, and an assessment of this has been included within Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. It is therefore considered that the ES methodology has complied with this aspect of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage.
Paragraph 199	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to these designated assets. Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage and sets out the impact of the Scheme on heritage assets. With regard to the Four bowl barrows north of the A11/A14 junction Scheduled Monument, as this asset is within the Order limits but outside the developable area it is considered that the operation of the Scheme will bring protection to the barrows from the potential for further plough damage as the land within which they are located is currently in agricultural use. This represents a positive contribution to this designated heritage asset and it is considered that this should be taken into account in the planning balance.
Paragraph 200	Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to these designated assets. The Scheme therefore does not lead to substantial harm to or loss of significance of any designated heritage asset.
Paragraph 201	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be	The Heritage Harm Assessment presented in Appendix D of the Planning Statement [EN010106/APP/7.2] states the Scheme will not result in

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.	substantial harm (or total loss of significance of) to designated heritage assets.
Paragraph 202	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	Designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. Mitigation and enhancement incorporated into the Scheme design minimises the harm to the setting of all designated assets as far as possible. This includes: a. Sensitive screening to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. The proposed mitigation planting has also taken into consideration the surrounding landscape character and focuses on the enhancement of existing vegetation. b. Significant setbacks and buffer zones from settlements are proposed to ensure that settlements remain isolated within the landscape. c. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure. In addition to the proposed mitigation strategy, the Scheme is proposed to be operational for 40 years with its decommissioning secured through a DCO requirement. There will therefore be no permanent loss of the significance of designated assets as a result of the Scheme allowing future generations to retain an understanding of their settings. A benefit of the Scheme will also be to take one of the Scheduled Monuments out of agricultural use thereby reducing plough damage to this asset during the operation of the Scheme. The Statement of Need [EN010106/APP/7.1] explains in detail the compelling case for the Scheme in relation to urgently delivering low carbon renewable energy to meet the aim of decarbonising the UK's electricity supplies by 2050; providing security of supply as well as affordability for end consumers. It is therefore considered that the urgent national need for the Scheme outweighs the less than substantial harm potentially caused to some heritage assets.
Paragraph 203	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The assessment of the effects of the Scheme on non-designated heritage assets is reported in Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. The assessment identifies that there will be effects upon non-designated archaeological assets (both recorded within the Historic Environment Record and identified through the fieldwork undertaken) within the Sites and the land for Grid Connection Routes A and B. This is due to the potential for physical impact upon these assets from the solar PV and associated infrastructure as well as the cable route groundworks in relation to the Grid Connection Routes A and B. The Statement of Need [EN010106/APP/7.1] explains in detail the compelling case for the Scheme in relation to urgently delivering low carbon renewable energy to meet the aim of decarbonising the UK's

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		electricity supplies by 2050; providing security of supply as well as affordability for end consumers. It is therefore considered that the urgent national need for the Scheme outweighs the effects on any non-designated heritage assets.
Paragraph 205	Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.	Design mitigation is proposed to minimise the direct physical impact upon the non designated assets already identified and any yet undiscovered remains during construction. This includes: a. avoiding areas of significant archaeological potential. Whilst as a result of the extensive field work to date these areas have been avoided, flexibility is built into the Scheme design as shown on the Works Plans [EN010106/APP/2.1]. There are therefore options for alterations to construction methodology or placement of panels and infrastructure if through any remaining field evaluation significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of these assets. b. minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains; and c. installing buffer zones, where practical, around any sensitive areas during construction. Where the above design mitigation cannot be applied to the management of the archaeological resource, it is proposed that: a. A programme of archaeological fieldwork and recording will be implemented for archaeological remains within the footprint of the Scheme. Any excavation work will be targeted upon those assets that would maximise knowledge gain in order to answer Scheme and site-specific research questions. Some sites may only warrant further investigation, rather than full-scale excavation. b. Where non-intrusive trenching methods are required for cable routes, a strategy will be developed which will detail

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		the monitoring of this, and it will include an action plan detailing the required mitigation in the event that there is any breakout in the vicinity of known archaeological remains. Where non-intrusive methods are not possible, archaeological strip, map and record excavation will be carried out. c. Archaeological mitigation fieldwork will be undertaken prior to construction works, pursuant to a DCO Requirement. The mitigation requirements are set out in the Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2] submitted as part of the DCO application and this will be secured with a detailed CEMP being a requirement of the DCO prior to construction commencing. d. There will be consultation and agreement of the archaeological mitigation strategy and plans and Written Schemes of Investigation with SCC and CCC archaeologists. A specific requirement relating to the agreement and implementation of these is provided for in the draft Development Consent Order [EN010106/APP/3.1]. It is therefore considered that the Scheme complies with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV11: Conservation Areas	Development proposals, within, or affecting a Conservation Area should: · Be of a particularly high standard of design and materials in order to preserve or enhance the character or appearance of the area. · Seek to retain attractive traditional materials and features such as original doors, windows, chimneys and boundary walls; and · Only involve the demolition of buildings where:.....	Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms due to the landscape mitigation embedded into the Scheme design. It is considered that the character and appearance of these Conservation Areas are not significantly impacted; therefore the Scheme demonstrates compliance with this part of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The Scheme does not include proposals to demolish buildings within Conservation Areas therefore this part of the policy does not apply.
Policy ENV 12: Listed Buildings	Proposals that affect a Listed Building will not be permitted where it would have a detrimental impact on the visual, architectural or historic significance of the asset. Proposals to extend, alter or change the use of a Listed Building will only be permitted where they would....:	The Scheme does not include proposals to extend, alter or change the use of a Listed Building so this part of the policy does not apply.
Policy ENV13: Local Register of Buildings and Structures	Proposals that affect a building or structure on the Local Register will not be permitted where it would have a detrimental impact on the visual, architectural or historic significance of the asset.	As stated in Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] , Local Lists have been considered in scoping the heritage assets affected by the Scheme. No locally listed buildings are considered to be affected by the Scheme.
Policy ENV14: Sites of archaeological interest	Development proposals at or affecting all sites of known or potential archaeological interest will: · Have regard to their impacts upon the historic environment and protect, enhance and where appropriate, conserve nationally designated and undesignated archaeological remains, heritage assets and their settings. · Require the submission of an appropriate archaeological evaluation/assessment of significance by a suitably qualified person. This initial work may be required prior to the submission of a planning application; and · Not be permitted where the proposals would cause substantial harm to new or known nationally important sites, including Scheduled Ancient Monuments and their settings.	Design mitigation is proposed to minimise the direct physical impact upon the non designated archaeological assets already identified and any yet undiscovered remains during construction. This includes: a. avoiding areas of significant archaeological potential. Whilst as a result of the extensive field work to date these areas have been avoided, flexibility is built into the Scheme design as shown on the Works Plans [EN010106/APP/2.1] . There are therefore options for alterations to construction methodology or placement of panels and infrastructure if through any remaining field evaluation significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of these assets. b. minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains; and c. installing buffer zones, where practical, round any sensitive areas during construction.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Where the above design mitigation cannot be applied to the management of the archaeological resource, it is proposed that: a. A programme of archaeological fieldwork and recording will be implemented for archaeological remains within the footprint of the Scheme. Any excavation work will be targeted upon those assets that would maximise knowledge gain in order to answer Scheme and site-specific research questions. Some sites may only warrant further investigation, rather than full-scale excavation. b. Where non-intrusive trenching methods are required for cable routes, a strategy will be developed which will detail the monitoring of this, and it will include an action plan detailing the required mitigation in the event that there is any breakout in the vicinity of known archaeological remains. Where non-intrusive methods are not possible, archaeological strip, map and record excavation will be carried out. c. Archaeological mitigation fieldwork will be undertaken prior to construction works, pursuant to a DC requirement. The mitigation requirements are set out in the Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2] submitted as part of the DCO application and this will be secured with a detailed CEMP being a requirement of the DCO prior to construction commencing. d. There will be consultation and agreement of the archaeological mitigation strategy and plans and Written Schemes of Investigation with SCC and CCC archaeologists. A specific requirement relating to the agreement and implementation of these is provided for in the draft Development Consent Order [EN010106/APP/3.1].

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy ENV15: Historic parks and gardens	Proposals that affect the significance of a Historic Park or Garden will not be permitted where they would have a detrimental impact on its character, amenity or setting. As part of any permission, the Council may seek the agreement of a management plan to secure the long-term preservation of the asset, promote good land management and encourage best use of resources.	Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] identifies impacts on the Grade II Registered Park and Garden (RPG) at Chippenham Hall. Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to the Grade II RPG at Chippenham Hall. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure It is also recognised that the harm to this asset will be reversible, lasting for the 40 year duration of the Scheme. The Scheme is therefore not considered to affect the significance of any Historic Parks or Gardens and as such is in compliance with this policy.
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS3: Landscape character and the Historic environment	The quality, character, diversity and local distinctiveness of the District's landscape and historic environment shall be protected, conserved and, where possible, enhanced. Proposals for development will take into account the local distinctiveness and sensitivity to change of distinctive landscape character types, and historic assets and their settings. Landscape types are described in the Forest Heath Landscape Character Assessment (LCA). The Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall landscape character, taking account of the key characteristics and distinctiveness of the landscape	The Scheme is the result of an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located, including its landscape character and historic assets and their settings. The mitigation strategy has therefore included the following principles to ensure the landscape impacts are minimised and significant adverse effects for landscape and visual amenity are avoided where possible to the wider area: a. Careful siting of the Scheme in the landscape by the structures being offset from pine lines, vegetation patterns and road networks; b. Conserving existing landscape, ecology and archaeological features (including below ground) across the Order limits, including the pine lines; and

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	and the landscape setting of settlements.	c. Creating new Green Infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the landscape structure and creating permissive routes to provide linkages between the villages of Freckenham and Isleham and Red Lodge and Worlington.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM17: Conservation Areas	Proposals for development within, adjacent to or visible from a Conservation Area should: a. preserve or enhance the character or appearance of the Conservation Area or its setting, and views into, through, and out of the area; b. be of an appropriate scale, form, height, massing, alignment and detailed design which respect the area's character and its setting; c. retain important natural features such as open spaces, plot divisions, boundary treatments, and trees and hedges, which contribute to the special character of the area; g. demonstrate a clear understanding of the significance of the Conservation Area and/or its setting, alongside an assessment of the potential impact of the proposal on that significance. The proposal should demonstrate how the key characteristics of the character area have been addressed. Proposals to demolish buildings or structures that make a positive contribution to the special architectural or historic interest of a Conservation Area will only be permitted in very exceptional circumstances. Applicants must demonstrate that they have addressed the considerations set out in national legislation and guidance for such proposals. All development proposals should provide a clear justification for the works, especially if these works would harm the significance of a Conservation Area or its setting, so that the harm can be weighed against any public	Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms due to the landscape mitigation embedded into the Scheme design. It is considered that the character and appearance of these Conservation Areas or their settings are not significantly impacted; therefore the Scheme demonstrates compliance with this part of the policy. The Scheme does not include proposals to demolish buildings within Conservation Areas therefore this part of the policy does not apply.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	benefits. The level of detail of any supporting information should be proportionate to the importance of the area, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.	
Policy DM19: Development Affecting Parks and Gardens of Special Historic or Design Interest	Proposals for development which affect the character, setting, or views into and/or out of parks and gardens of special historic or design interest and their settings must not have a detrimental impact upon: a. the overall design and layout; b. features, both built and natural, which form an integral part of the design and layout; and c. views into, through, or out of the park or garden, particularly those which are an integral part of the design.	Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] identifies impacts on the Grade II Registered Park and Garden (RPG) at Chippenham Hall. Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in less than substantial harm to the Grade II RPG at Chippenham Hall. No development is proposed adjacent to the Chippenham RPG formal park boundary and a landscaping buffer is provided either side of the Avenue. New planting is also proposed along the Avenue of the RPG to reinstate a linear row of trees and recreate its physical structure It is also recognised that the harm to this asset will be reversible, lasting for the 40 year duration of the Scheme. The Scheme is therefore not considered to affect the character, setting, or views into and/or out of parks and gardens of special historic or design interest and as such is in compliance with this policy.
Policy DM20: Archaeology	Development will not be acceptable if it would have a material adverse effect on Scheduled Ancient Monuments or other sites of archaeological importance, or their settings. On sites of archaeological interest, or of potential archaeological importance, provided there is no overriding case against development, planning permission will be granted subject to satisfactory prior arrangements being agreed. This will include one or a combination of the following: a. an appropriate desk based assessment and/or field evaluation	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that the Scheme would not result in substantial harm to these designated assets. With regard to the Four bowl barrows north of the A11/A14 junction Scheduled Monument, as this asset is within the Order limits but outside the developable area it is considered that the operation of the Scheme will bring protection to the barrows from the potential for further plough damage as the land within which they are located is currently in agricultural use.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	of the archaeological interest or significance prior to determination. b. the preservation of archaeological remains in situ; c. the adequate recording of the heritage asset by archaeological investigation before development commences (preservation by record)	Design mitigation is proposed to minimise the direct physical impact upon the non designated archaeological assets already identified and any yet undiscovered remains during construction. This includes: a. avoiding areas of significant archaeological potential. Whilst as a result of the extensive field work to date these areas have been avoided, flexibility is built into the Scheme design as shown on the Works Plans [EN010106/APP/2.1]. There are therefore options for alterations to construction methodology or placement of panels and infrastructure if through any remaining field evaluation significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of these assets. b. minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains; and c. installing buffer zones, where practical, around any sensitive areas during construction. Where the above design mitigation cannot be applied to the management of the archaeological resource, it is proposed that: a. A programme of archaeological fieldwork and recording will be implemented for archaeological remains within the footprint of the Scheme. Any excavation work will be targeted upon those assets that would maximise knowledge gain in order to answer Scheme and site-specific research questions. Some sites may only warrant further investigation, rather than full-scale excavation. b. Where non-intrusive trenching methods are required for cable routes, a strategy will be developed which will detail the monitoring of this, and it will include an action plan detailing the required mitigation in the event that there is any breakout in the vicinity of known archaeological remains. Where non-intrusive methods are not possible, archaeological strip, map and record excavation will be carried out.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		c. Archaeological mitigation fieldwork will be undertaken prior to construction works, pursuant to a DCO Requirement. The mitigation requirements are set out in the Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2] submitted as part of the DCO application and this will be secured with a detailed CEMP being a requirement of the DCO prior to construction commencing. d. There will be consultation and agreement of the archaeological mitigation strategy and plans and Written Schemes of Investigation with SCC and CCC archaeologists. A specific requirement relating to the agreement and implementation of these is provided for in the draft Development Consent Order [EN010106/APP/3.1]. It is therefore considered that the Scheme accords with this policy.
Fordham Neighbourhood Plan (made December 2018)		
Policy 7: Locally Important Buildings & Structures	The following properties and structures are designated as Locally Important Buildings: · FLIB01 – Fire Station and Pump, Carter Street · FLIB02 – Pelham House and Ashleydale, nos 92 and 94 Carter Street · FLIB03 – The former Wesleyan Chapel, Sharmans Road · FLIB04 – 46 Market Street, formerly known as Shrublands House · FLIB05 – 12-18 Grove Park · FLIB06 – The Ironbridge, Ironbridge Path · FLIB07 – 4 Mill Lane · FLIB08 – Victoria Hall, Carter Street · FLIB09 – Pump on the south side of Carter Street · FLIB10 – Seeley House, 32 Church Street · FLIB11 – 83 and 85 Mill Lane · FLIB12 – Trinity Hall, Collin's Hill	The Scheme does not affect the significance of a Locally Important Building identified in this plan.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	· FLIB13 – The Old Lodge, 9 Newmarket Road Development proposals requiring planning permission that have the potential to affect the significance of a Locally Important Building, including the contribution made by its appearance and setting, should be accompanied by a heritage statement. Proposals that would enhance or better reveal the significance of these locally important heritage assets will be supported. Proposals that would harm the significance of a locally important building directly, or through development in its setting, must be clearly justified.	
Draft NPS EN-1		
Paragraph 5.9.7	Non-designated heritage assets that have been recognised by the Secretary of State as being of equivalent significance to Scheduled Monuments or Protected Wreck Sites, or that have yet to be formally assessed but have archaeological interest and have potential to demonstrate equivalent significance to Scheduled Monuments or Protected Wreck Sites, should be considered subject to the same policy considerations as those that apply to designated heritage assets.	Non designated heritage assets with archaeological interest are identified in Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes these assets and their significance. The assessment concludes that no non designated heritage assets of schedulable quality will be harmed by the Scheme.
Paragraph 5.9.10	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these in the ES (see Section 4.2). This should include consideration of heritage assets above, at, and below the surface of the ground.	Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear and detailed assessment of likely impacts and effects of the Scheme on cultural heritage.
Paragraph 5.9.13	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the	Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the heritage assets within the study area for the Scheme and their significance. and the contribution of their setting to that significance.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage. The ES [EN010106/APP/6.1] is therefore in full compliance with this policy.
Paragraph 5.9.14	The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: a. enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected b. considering measures that address those heritage assets which are at risk or which may become at risk, as a result of the scheme c. considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme.	Section 7.5 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] describes the heritage assets within the study area for the Scheme and their significance. and the contribution of their setting to that significance. Paragraph 4.7.4 of the Planning Statement [EN010106/APP/7.2] explains that, in compliance with this policy, the Applicant has taken care to limit harm to heritage assets through design. Through this process, the Applicant has taken the opportunity to enhance ten areas of high value significant archaeological activity (totalling approximately 97 ha) by removing them from the developable area, but retaining them within Order Limits. This will preserve them in situ and protect them from plough damage for the duration of the Scheme by taking the land out of agriculture.
Paragraph 5.9.15	Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent.	Section 7.8 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage, including whether such effects are likely to be direct or indirect, temporary or permanent.
Paragraph 5.9.16	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] includes an assessment of the Scheme upon Conservation Areas within the vicinity of the Order limits. This concludes that there are anticipated to be minor adverse effects on the Freckenham Conservation Area the Isleham Conservation Area and the Snailwell Conservation Area as a result of the Scheme, which is considered not significant in EIA terms due to the landscape mitigation embedded into the Scheme design. It is considered that the character and appearance of

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		these Conservation Areas or their settings are not significantly impacted by the Scheme. There are no World Heritage Sites affected by the Scheme.
Paragraph 5.9.21	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets. Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage and sets out the impact of the Scheme on heritage assets. This represents a positive contribution to this designated heritage asset and it is considered that this should be taken into account in the planning balance.
Paragraph 5.9.22	Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of significance of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets or their significance, in line with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.9.23	The Secretary of State should give considerable importance and weight to the desirability of preserving all designated heritage assets. Any harmful impact on the significance of a designated heritage asset should be given significant weight when weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets or their significance, in line with this policy.
Paragraph 5.9.24	Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a. the nature of the heritage asset prevents all reasonable uses of the site b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible d. the harm or loss is outweighed by the benefit of bringing the site back into use	Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme. Two Scheduled Monuments, which are of national importance, and one Grade II registered park and garden which is of lesser importance will experience less than substantial harm to their settings. The Scheme will not have any direct adverse impacts to designated heritage assets or their significance, in line with this policy.
Paragraph 5.9.26	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The assessment of the effects of the Scheme on non-designated heritage assets is reported in Section 7.7 of Chapter 7: Cultural Heritage of the ES [EN010106/APP/6.1]. The assessment identifies that there will be effects upon non-designated archaeological assets (both recorded within the Historic Environment Record and identified through the fieldwork undertaken) within the Sites and the land for Grid Connection Routes A and B. This is due to the potential for physical impact upon these assets

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		from the solar PV and associated infrastructure as well as the cable route groundworks in relation to the Grid Connection Routes A and B. The Statement of Need [EN010106/APP/7.1] explains in detail the compelling case for the Scheme in relation to urgently delivering low carbon renewable energy to meet the aim of decarbonising the UK's electricity supplies by 2050; providing security of supply as well as affordability for end consumers. It is therefore considered that the urgent national need for the Scheme outweighs the limited effects on any non-designated heritage assets.
Paragraph 5.9.28	Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the Secretary of State should not take its deteriorated state into account in any decision.	There are no heritage assets identified in the study area where evidence was found of deliberate neglect of, or damage to, the asset.

Table 5 Relevant policy requirements relating to biodiversity

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 4.3.1	Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations, (which implement the relevant parts of the Habitats Directive and the Birds Directive in England and Wales) consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.	In accordance with this policy, the Applicant has consulted Natural England with regard to the scope of the Appropriate Assessment. Information that will enable the Secretary of State to carry out the Appropriate Assessment to be undertaken by the Secretary of State can be found in Appendix 8M of the ES [EN010106/APP/6.2] .
Paragraph 5.3.3	Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the IPC consider thoroughly the potential effects of a proposed project.	Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] sets out all the designated sites of ecological or geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for the Scheme. Sections 8.9 and 8.10 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] clearly set out the expected effects on the above receptors during the construction, operation and decommissioning phases of the Scheme. This concludes that there are anticipated to be no significant adverse effects on any internationally, nationally or locally designated sites as a result of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		It is therefore considered that the scope of the ES [EN010106/APP/6.1] accords with this policy.
Paragraph 5.3.4	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. This is in reference to measures set out in the OELMP Appendix 10I of the ES and the parameters shown on the Works Plans. Whilst the majority of habitat lost is of low ecological value and of no more than local importance, e.g. arable farmland, any important ecological features (such as natural/semi-natural grasslands) have been taken forward for further assessment and embedded design measures described in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] ensure no net loss in these important habitat types. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 5.3.6	In having regard to the aim of the Government's biodiversity strategy the IPC should take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity. The policy set out in the following sections recognises the need to protect the most important biodiversity and geological conservation interests. The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The IPC may take account of any such net benefit in cases where it can be demonstrated.	As explained in the Statement of Need [EN010106/APP/7.1], the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved. A BNG assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The urgent and national need for the Scheme as outlined in the Statement of Need [EN010106/APP/7.1] , combined with the overall net gain for biodiversity achieved as a result of the Scheme, should be considered in the planning balance.
Paragraph 5.3.7	As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought.	As outlined in Section 8.9 and 8.10 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], there are anticipated to be no potential for significant adverse effects on any designated ecological sites, habitats or protected species. Embedded design mitigation measures are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], and described in further detail within the OLEMP (Appendix 10I: Outline Landscape and Ecology Management Plan of the ES [EN010106/APP/6.2], Framework CEMP (Appendix 16C: Framework Construction Environmental Management Plan of the Environmental Statement [EN010106/APP/6.2]), Framework OEMP (Appendix 16F: Framework Operational Environment Management Plan of the Environmental Statement [EN010106/APP/6.2]), Framework DEMP (Appendix 16F: Framework Outline Decommissioning Management Plan of the Environmental Statement [EN010106/APP/6.2]), and illustrative parameter plans (Figures 3-1 and 3-2 of the ES [EN010106/APP/6.3]). These include habitat avoidance, creation and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation.
Paragraph 5.3.8	In taking decisions, the IPC should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] sets out all the designated sites of ecological or geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity. Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] clearly sets out the expected effects on the above receptors during the

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		construction, operation and decommissioning phases of the Scheme. This concludes that there are anticipated to be no significant adverse effects on any internationally, nationally or locally designated sites as a result of the Scheme. The Scheme is therefore considered to be in accordance with this policy.
Paragraph 5.3.9	The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for these sites but do not provide statutory protection for potential Special Protection Areas (pSPAs) before they have been classified as a Special Protection Area. For the purposes of considering development proposals affecting them, as a matter of policy the Government wishes pSPAs to be considered in the same way as if they had already been classified. Listed Ramsar sites should, also as a matter of policy, receive the same protection.	No such sites are present within the study area.
Paragraph 5.3.10	Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. All National Nature Reserves are notified as SSSIs.	There are no statutory national nature conservation sites within the Order Limits. Table 8-4 in Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies eight SSSIs within 2km of the Order Limits, namely: Chippenham Fen and Snailwell Poor's Fen SSSI; Snailwell Meadows SSSI; Brackland Rough SSSI; Red Lodge Heath SSSI; Cherry Hill and The Gallops, Barton Mills SSSI; Newmarket Heath SSSI; Devil's Dyke SSSI; and Breckland Forest SSSI. Table 8-4 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] also sets out a description of these SSSI. The assessment in Chapter 8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] of the likely significant impacts of the Scheme on these sites, and concludes that there are no potential significant adverse effects as a result of the construction or operation of the Scheme on these sites.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.3.11	Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The IPC should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on any SSSIs. The policy therefore does not apply to this Scheme.
Paragraph 5.3.13	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. The IPC should give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.	Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies one site of regional and local biodiversity interest within 2km of the Scheme, namely Barton Mills Local Nature Reserve (LNR). Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] also identifies 26 County Wildlife Sites (CWS) within 2km of the Scheme. Two Local Geological Sites (Carter's Pit and The Spring) are located in Burwell, approximately 1km from the Order Limits. Section 8.7 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on these sites. The Scheme is therefore anticipated to lead to no harmful effects on sites of regional and local biodiversity and geological interest, in accordance with this policy.
Paragraph 5.3.14	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland	As stated in Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], no sites ancient woodland or veteran trees were identified within the study area As outlined in Chapter 8: Ecology of the ES [EN010106/APP/6.1], all woodland present within the Order limits will be retained and measures

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.	embedded within the Scheme design to protect retained habitats during construction, such as that security fencing will be established at an early stage to protect retained habitats from incursion during construction. In direct accordance with this policy, there will be no direct loss of woodland habitat. There will also be no fragmentation of habitats, or of populations of species using woodland habitats, during construction. Boundary vegetation, such as hedgerows connecting woodland sites will be retained, which will allow for connectivity across the Order limits.
Paragraph 5.3.15	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the IPC should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate.	A BNG assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme therefore provides a net gain for biodiversity in accordance with this policy.
Paragraph 5.3.18	The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: ▪ during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; ▪ during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; ▪ habitats will, where practicable, be restored after construction works have finished; and ▪ opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals	Embedded design mitigation measures of the kind set out in this policy are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], and described in further detail within the OLEMP (Appendix 10I of the ES [EN010106/APP/6.2]), Framework CEMP (Appendix 16C of the ES [EN010106/APP/6.2]), Framework OEMP (Appendix 16F of the ES [EN010106/APP/6.2]), Framework DEMP (Appendix 16E of the ES [EN010106/APP/6.2]), and the parameters shown on the Works Plans. The Framework CEMP (Appendix 16C of the ES [EN010106/APP/6.2]) includes best practice measures to ensure that activities will be confined to the minimum areas required for the works during construction, in accordance with this part of the policy. Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] outlines mitigation measures pertaining to habitat avoidance, creation and replacement measures that comply with this part of the policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Whilst the majority of habitat lost is of low ecological value and of no more than local importance, e.g. arable farmland, any important ecological features (such as natural/semi-natural grasslands) have been taken forward for further assessment and embedded design measures described in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] ensure no net loss in these important habitat types. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme therefore makes use of opportunities to enhance habitats and achieve BNG in line with this part of the policy.
Paragraph 5.3.20	The IPC will need to take account of what mitigation measures may have been agreed between the applicant and Natural England (or the Countryside Council for Wales) or the Marine Management Organisation (MMO), and whether Natural England (or the Countryside Council for Wales) or the MMO has granted or refused or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	Section 8.8 of Chapter 8: Ecology and Nature Conservation of the ES [EN010106/APP/6.1] sets out the mitigation measures embedded within the Scheme design. Consultation with NE has informed these mitigation measures. No protected species mitigation licenses are required for the principal sites, however a license for closure of a Badger sett at the Burwell National Grid substation extension will be required. The mitigation strategy to support a license application for sett closure is provided in Annex B of Appendix 8K of this Environmental Statement [EN010106/APP/6.2].
National Planning Policy Framework (NPPF)		
Paragraph 174	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;	Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on internationally, nationally or locally designated ecological sites. The Scheme therefore complies with part a) of the policy. The Tree Constraints Report in Appendix 10B of the ES [EN010106/APP/6.2] and Figure 10-3 of the ES [EN010106/APP/6.3] identifies no ancient woodland or veteran trees within the Order limits. Prior to construction a detailed tree survey will be undertaken to confirm the status of trees affected by the Scheme. The CEMP, to be secured through a requirement of the DCO, will include specific tree protection measures to be implemented, including fencing and construction

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; ...	exclusion zones. The Scheme therefore demonstrates compliance with part b) of the policy. There are no proposals to build on the coast as part of the Scheme; therefore part c) of the policy is not applicable. A BNG assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme therefore provides a net gain for biodiversity in accordance with part d) of the policy.
Paragraph 180	When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be	Table 8-4 in Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies eight SSSIs within 2km of the Order Limits, namely: Chippenham Fen and Snailwell Poor's Fen SSSI; Snailwell Meadows SSSI; Brackland Rough SSSI; Red Lodge Heath SSSI; Cherry Hill and The Gallops, Barton Mills SSSI; Newmarket Heath SSSI; Devil's Dyke SSSI; and Breckland Forest SSSI. Table 8-4 in Chapter 8: Ecology of the ES [EN010106/APP/6.1] also sets out a description of these SSSI. Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on any SSSIs. Parts a) and b) of the policy are therefore not applicable to the Scheme. As outlined in Chapter 8: Ecology of the ES [EN010106/APP/6.1], all woodland present within the Order limits will be retained and measures embedded within the Scheme design to protect retained habitats during construction, such as that security fencing will be established at an early stage to protect retained habitats from incursion during construction. There will be no direct loss of woodland habitat, in accordance with part c) of the policy. A BNG assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG,

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	encouraged, especially where this can secure measurable net gains for biodiversity	the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme therefore provides a net gain for biodiversity and is strongly supported by part d) of the policy.
Paragraph 181	The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.	No such sites are present within the study area.
Paragraph 185	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	As outlined in Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] , there are anticipated to be no noise and visual disturbances from the construction nor operation of the Scheme that will impact on the integrity or the functioning of a designated international, national or local ecological site. The Scheme therefore demonstrates that it is appropriate for its location with regards to the likely effects of noise pollution, in accordance with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV7: Biodiversity and Geology	All development proposals will be required to: ▪ Protect the biodiversity and geological value of land and buildings and minimise harm to or loss of environmental features, such as trees, hedgerows, woodland, wetland and ponds.	A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2] . For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	▪ Provide appropriate mitigation measures, reinstatement or replacement of features and/or compensatory work that will enhance or recreate habitats on or off site where harm to environmental features and habitat is unavoidable; and ▪ Maximise opportunities for creation, restoration, enhancement and connection of natural habitats as an integral part of development proposals. Development proposals where the main aim is to conserve biodiversity will be permitted; and opportunities to incorporate biodiversity into new development will be supported. All applications for development that may affect biodiversity and geology interests must be accompanied by sufficient information to be determined by the Local Planning Authority, including an ecological report, to allow potential impacts and possible mitigation measures to be assessed fully. Where there is reason to suspect the presence of protected species, trees and woodland, applications must be accompanied by a survey carried out by a qualified individual assessing their presence and, if present, the proposal must be sensitive to, and make provision for, their needs, in accordance with the relevant protecting legislation. Where appropriate, there will be a requirement for the effective management of designated sites and other features, controlled through the imposition of conditions or Section 106 agreements. ▪ Proposals which have an adverse impact on a site of international importance will not normally be permitted unless there are exceptional overriding reasons of public interest (human health, public safety or environmental benefit). ▪ Proposals which have an adverse impact on a site of national importance will not normally be permitted unless the benefits of development at the site significantly outweigh the impacts. Proposals which would cause harm to County Wildlife Sites, Ancient Woodland, aged and veteran trees, Local Nature Reserves, Protected Roadside Verges, any other irreplaceable habitats, and green corridors or important species will not be	units and approximately 1.98% of river units for biodiversity. The Scheme therefore promotes habitat creation and is supported by this part of the policy. Embedded design mitigation measures of the kind set out in this policy are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], and described in further detail within the OLEMP (Appendix 10I of the ES [EN010106/APP/6.2]), Framework CEMP (Appendix 16C of the ES [EN010106/APP/6.2]), Framework OEMP (Appendix 16F of the ES [EN010106/APP/6.2]), Framework DEMP (Appendix 16E of the ES [EN010106/APP/6.2]). The Tree Constraints Report in Appendix 10B of the ES [EN010106/APP/6.2] and Figure 10-3 of the ES [EN010106/APP/6.3] identifies no ancient woodland or veteran trees within the Order limits. Prior to construction a detailed tree survey will be undertaken to confirm the status of trees affected by the Scheme. The CEMP, to be secured through a requirement of the DCO, will include specific tree protection measures to be implemented, including fencing and construction exclusion zones. As outlined in Chapter 8: Ecology of the ES [EN010106/APP/6.1], all woodland present within the Order limits will be retained and measures embedded within the Scheme design to protect retained habitats during construction, such as that security fencing will be established at an early stage to protect retained habitats from incursion during construction. There will be no direct loss of woodland habitat. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies six internationally designated ecological sites within 10km of the Scheme, namely: Fenland Special Area of Conservation (SAC); Breckland Special Protection Area (SPA); Wicken Fen Ramsar and Wicken Fen NNR; Rex Graham Reserve SAC; Breckland SAC; and Devil's Dyke SAC.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	permitted unless the need for, and benefits of development in that location outweigh the potential harm to nature conservation interests.	There are no statutory national nature conservation sites within the Order Limits. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies eight SSSIs within 2km of the Order Limits, namely: Chippenham Fen and Snailwell Poor's Fen SSSI; Snailwell Meadows SSSI; Brackland Rough SSSI; Red Lodge Heath SSSI; Cherry Hill and The Gallops, Barton Mills SSSI; Newmarket Heath SSSI; Devil's Dyke SSSI; and Breckland Forest SSSI. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies one site of regional and local biodiversity and geological interest within 2km of the Scheme, namely Barton Mills Local Nature Reserve (LNR). Section 8.7 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on the above designated sites, thus complying with this policy.
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS2: Natural Environment	Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures. Links between such areas will also be sought. Measures will include: - the designation of Local Nature Reserves (LNR), County Wildlife Sites (CWS) and Regionally Important Geological/Geomorphological Sites (RIGS); - appropriate management of valuable areas (such as County Wildlife Sites); ... - minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network; - promotion of Green Infrastructure enhancement and/or provision on all new developments;	The principles of biodiversity net gain (BNG) have been incorporated in the Scheme design. For the purposes of BNG the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The results of the BNG assessment are summarised in OLEMP in Appendix 10I of the Environmental Statement [EN010106/APP/6.2]. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies one site of regional and local biodiversity and geological interest within 2km of the Scheme, namely Barton Mills Local Nature Reserve (LNR). Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies two county wildlife sites within the Order limits. No Regionally Important Geological/Geomorphological Sites were identified within 2km of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	... Particular attention will also be paid to initiatives which will improve the natural environment where it is poor or lacking in diversity, this could include brownfield sites or non-BAP habitats. The protection and management of these sites will be sought accordingly as they are identified and their importance established. Where mitigation measures are employed they will result in a net gain of biodiversity for the District. Proposals should also seek to incorporate: - adequate and appropriate landscaping and natural areas informed by Landscape Character Assessment; and - increased public access to the countryside through green corridors, these should create convenient and attractive links and networks between development and the surrounding area. New built development will be restricted within 1,500m of components of the Breckland SPA designated for Stone Curlew. Proposals for development in these areas will require a project level Habitat Regulations Assessment (HRA) (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed. Where new development is proposed within 400m of components of the Breckland SPA designated for Woodlark or Nightjar a project level Habitats Regulation Assessment (HRA) will be required (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed. New development will also be restricted within 1,500m of any 1km grid squares which has supported 5 or more nesting attempts by stone curlew since 1995. Proposals for development within these areas will require a project level HRA (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.	Section 8.7 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on the above sites. The Scheme therefore complies with the policy's aim of appropriately managing valuable areas. As outlined in Chapter 8: Ecology of the ES [EN010106/APP/6.1], all woodland present within the Order limits will be retained and measures embedded within the Scheme design to protect retained habitats during construction, such as that security fencing will be established at an early stage to protect retained habitats from incursion during construction. There will be no direct loss of woodland habitat. There will be no fragmentation of habitats, or of populations of species using woodland habitats, during construction. Boundary vegetation, such as hedgerows connecting woodland sites will be retained, which will allow for connectivity across the Order limits. There are no proposals to develop land within 1,500m of components of the Breckland SPA designated for Stone Curlew or 400m of components of the Breckland SPA designated for Woodlark or Nightjar; these parts of the policy therefore do not apply to the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance	When considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and the following criteria: a. the ecological or geological value and objectives for which the site was classified or designated; b. the integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources; c. the cumulative impact of the proposal and other developments on the wildlife or geological value of the site; d. the presence of protected species, habitat areas and wildlife corridors, or geological features, and proposed measures to safeguard and enhance them; e. the opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species; f. guidance set down within Biodiversity Action Plans (BAP), habitat management plans and other relevant sources; and g. the extent to which the imposition of conditions or planning obligation: i. would mitigate the effects of the development and/or protect the geological or nature conservation value of the locality; ii. ensure replacement habitat or features; and/or iii. ensure that resources are made available for the future enhancement and management of the replacement habitat or feature to enable it to attain the quality and attributes that have been lost Proposals for development which would adversely affect the integrity of areas of international nature conservation or geological importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species	A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies six internationally designated ecological sites within 10km of the Scheme, namely: Fenland Special Area of Conservation (SAC); Breckland Special Protection Area (SPA); Wicken Fen Ramsar and Wicken Fen NNR; Rex Graham Reserve SAC; Breckland SAC; and Devil's Dyke SAC. There are no statutory national nature conservation sites within the Order Limits. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies eight SSSIs within 2km of the Order Limits, namely: Chippenham Fen and Snailwell Poor's Fen SSSI; Snailwell Meadows SSSI; Brackland Rough SSSI; Red Lodge Heath SSSI; Cherry Hill and The Gallops, Barton Mills SSSI; Newmarket Heath SSSI; Devil's Dyke SSSI; and Breckland Forest SSSI. Section 8.6 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] identifies one site of regional and local biodiversity and geological interest within 2km of the Scheme, namely Barton Mills Local Nature Reserve (LNR). Section 8.7 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on the above designated sites. As outlined in Chapter 8: Ecology of the ES [EN010106/APP/6.1], all woodland present within the Order limits will be retained and measures

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Regulations 2010 (as amended). Proposed development likely to result in adverse effects to a SSSI will not be permitted unless the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. Proposals which would result in significant harm to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not be permitted. Note: With respect to criterion g) the provision of replacement habitat or features is viewed as a last resort, rather than a regular development tool. Where compensation has been established as an acceptable approach, it will be necessary to provide replacement areas of at least equivalent value to the lost habitats. The local planning authority will normally expect new habitats to be in place to a satisfactory standard before the original habitats are lost.	embedded within the Scheme design to protect retained habitats during construction, such as that security fencing will be established at an early stage to protect retained habitats from incursion during construction. There will be no direct loss of woodland habitat. There will be no fragmentation of habitats, or of populations of species using woodland habitats, during construction. Boundary vegetation, such as hedgerows connecting woodland sites will be retained, which will allow for connectivity across the Order limits. There are no statutory national nature conservation sites within the Order Limits. However a number of national conservation sites can be found within 2km of the Order Limits and a number of internationally designated sites can be found within 10km of the Scheme. It is concluded that the Scheme will not result in significant adverse effects to these designated sites.
Policy DM11: Protected Species	Development which would have an adverse impact on species protected by the Conservation of Habitats and Species Regulations (2010) (as amended), the Wildlife and Countryside Act (1981), the Protection of Badgers Act (1992), and listed in the Suffolk Biodiversity Action Plan, or subsequent legislation, will not be permitted unless there is no alternative and the local planning authority is satisfied that suitable measures have been taken to: a. reduce disturbance to a minimum; and b. i. maintain the population identified on site; or ii. provide adequate alternative habitats to sustain at least the current levels of population. Where appropriate, the local planning authority will use planning conditions and/or planning obligations to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum. Note: Developers should take into account separate legislation, Acts, regulations, case law, planning guidance and any	As outlined in Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], there are anticipated to be no significant adverse effects on species protected by the Conservation of Habitats and Species Regulations (2010) (as amended), the Wildlife and Countryside Act (1981), the Protection of Badgers Act (1992), and listed in the Suffolk Biodiversity Action Plan as a result of the construction, operation or decommissioning of the Scheme. Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] outlines that up to ten 2ha nesting/foraging plots for Stone Curlew will be created in advance of construction and of the Stone Curlew breeding season. Details of plot creation and management of nesting plots has drawn on best practice guidance. As well as the bare ground plots, approximately 108ha of predominantly arable farmland have been embedded within the Scheme for reversion to grassland, specifically managed to create a close-cropped sward,

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	subsequent replacement Supplementary Planning Documents and laws preventing interference with protected species, and should be aware of the need to undertake relevant assessments, studies and surveys as required prior to the submission of planning and related applications.	suitable for Stone Curlew. Small areas of existing acid grassland have also been retained within the Scheme design in Sunnica East Site B and these will form the basis of reverting adjacent areas in Sunnica East Site B to semi-natural grassland, characteristic of the Breckland heaths. In time this will provide a high quality habitat, offering both nesting and foraging opportunities for Stone Curlew. The disturbed plots will be retained within these established grassland areas for the lifespan of the project. Within Sunnica East Site A the offsetting area will be sown with a chalk grassland mix and managed specifically for Stone Curlew, i.e. maintaining a close-cropped sward. The plots will be retained within these established grassland areas for the lifespan of the project. Construction will be phased so that areas within 500m of the new habitat provisions are developed outside the Stone Curlew breeding season of March to October and that the replacement provisions are ready for use by Stone Curlew by the breeding season at the start of construction. All construction staff working within Sunnica East Sites A and B will also be given a toolbox talk regarding the sensitivity of Stone Curlew. A number of embedded mitigation measures have been incorporated in to the Scheme's design to accommodate other protected species as asset out in the OLEMP and the Framework CEMP.
Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity	In addition to, or as part of the requirements of other policies in this DPD, measures should be included, as necessary and where appropriate, in the design for all developments for the protection of biodiversity and the mitigation of any adverse impacts. Additionally, enhancement for biodiversity should be included in all proposals, commensurate with the scale of the development. For example, such enhancement could include watercourse improvements to benefit biodiversity and improve water quality, habitat creation, wildlife links (including as part of green or blue infrastructure) and	A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity; further to the measures to be delivered pursuant to the OLEMP. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	building design which creates wildlife habitat (e.g. green roofs, bird and/or bat boxes).	
Fordham Neighbourhood Plan (made December 2018)		
Policy 8: Wildlife and Habitats	Development proposals that would have a significant adverse effect (including through recreational pressure) on the nationally and internationally protected sites at Fordham Wood or Chippenham Fen will not be approved. Development proposals should, wherever possible, seek to enhance connectivity of green networks through the inclusion of strong landscaping schemes that include trees, shrubs, hedgerows, green roofs and green walls, for example. Wherever possible, development proposals should avoid the loss of wildlife habitats or natural features such as trees, hedgerows, watercourses or ponds. Where the loss of a feature is unavoidable, mitigation may be acceptable through the introduction of new features that will result in at least a neutral impact on the wildlife. Overall a net gain in biodiversity should be achieved, demonstrated by appropriate evidence prepared by a suitably qualified person on behalf of the applicant.	The Scheme is adjacent to Chippenham Fen. However, as stated in Section 8.9 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], there are anticipated to be no significant adverse effects on this site as a result of the construction or operation of the Scheme. Gaps in defunct hedges along the cable route within the Fordham Neighbourhood Plan area will be planted with suitable native species to improve habitat connectivity of with, for example, broad-leaved woodland within the Sites and linked to habitat beyond the Sites. A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme's design incorporates mitigation measures to protect native species and improve habitat connectivity. It is also anticipated that there will be no adverse effects on nationally and internationally protected sites at Chippenham Fen.
Draft NPS EN-1		
Paragraph 4.5.1	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Applicants should therefore not just look to mitigate direct harms, but also consider whether there are opportunities for enhancements. Biodiversity net gain is an essential component of environmental net gain. Projects should consider and seek to incorporate improvements in natural capital, ecosystem services	A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	and the benefits they deliver when planning how to deliver biodiversity net gain.	Section 8.8 of Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] provides information on how the project has taken advantage of opportunities to enhance biodiversity. The layout of these enhancement and mitigation areas are shown in Figures 3-1 and 3-2. A Biodiversity Net Gain assessment has also been provided in Appendix 8N the Environmental Statement [EN010106/APP/6.2]
Paragraph 4.5.2	Although achieving biodiversity net gain is not an obligation for projects under the Planning Act 2008, energy NSIP proposals should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity where possible. Applicants are encouraged to use the most current version of the Defra biodiversity metric to calculate their biodiversity baseline and inform their biodiversity net gain outcomes and to present this data as part of their application. Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations.	Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] sets out how the Scheme has been designed to follow the mitigation hierarchy. A BNG assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 5.4.4	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. As set out in Section 4.6, the design process should embed opportunities for nature inclusive design. The applicant is encouraged to consider how their proposal can contribute towards Biodiversity Net Gain in line with the ambition set out in the 25 Year Environment Plan. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains. The scope of potential gains will be dependent on the type, scale, and location of each project.	Section 8.8 of Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] provides information on how the project has taken advantage of opportunities to conserve and enhance biodiversity in line with the 25 Year Environment Plan; with the variety of habitats to be planted pursuant to the OLEMP. A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2]. For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity. It is therefore considered that the Scheme has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests and accords with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.4.5	The government's 25 Year Environment Plan marked a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's 25 Year Environment Plan and any relevant measures and targets. In doing so, the Secretary of State should also take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity. The policy set out in the following sections recognises the need to protect and enhance biodiversity and geological conservation interests. The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated."	Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] has been produced with regard to the aims and goals of the 25 Year Environment Plan, as evidenced by the extensive habitat to be provided pursuant to the OLEMP. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.6	As a general principle, and subject to the specific policies below, development should at the very least aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.2 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought. If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	Embedded design mitigation measures are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], and described in further detail within the OLEMP (see Appendix 10I of the Environmental Statement [EN010106/APP/6.2], Framework CEMP (see Appendix 16C of the Environmental Statement [EN010106/APP/6.2]), Framework OEMP (see Appendix 16F of the Environmental Statement [EN010106/APP/6.2]), Framework DEMP (see Appendix 16E of the Environmental Statement [EN010106/APP/6.2]), the parameters shown on the Works Plans . These include habitat avoidance, creation and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. No significant effects are expected to arise to biodiversity receptors as a result of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.8	Important sites for biodiversity are those identified through international conventions and the Habitats Regulations. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas. As a matter of policy,	Both Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] and Appendix 8M: Report to Inform Appropriate Assessment of this Environmental Statement [EN010106/APP/6.2] consider pSPAs, pSACs, Ramsar sites (listed or proposed) and sites identified, or required, as compensatory

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	the following should be given the same protection as sites covered by the Habitat's Regulations: (a) potential Special Protection Areas and possible Special Areas of Conservation; (b) listed or proposed Ramsar sites; and (c) sites identified, or required, as compensatory measures for adverse effects on other HRA sites.	measures for adverse effects on other HRA sites, where relevant therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.4.10	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	Section 8.9 of Chapter 8: Ecology and Nature Conservation of the ES [EN010106/APP/6.1] sets out the effects on designated sites of ecological importance, including SSSIs. This concludes that with careful Scheme design and embedded mitigation, there will be no adverse effects on SSSIs and it is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.12	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. The Secretary of State should give due consideration to such regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent. Development will still be expected to comply with the biodiversity and geological conservation requirements set out in this NPS.	Section 8.9 of Chapter 8: Ecology and Nature Conservation of the ES [EN010106/APP/6.1] sets out the effects on designated sites of ecological importance, including sites of regional and local biodiversity interest. This concludes that with careful Scheme design and embedded mitigation, there will be no adverse effects on these sites and therefore the Scheme is compliant with this policy. No Regionally Important Geological/Geomorphological Sites were identified within 2km of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.4.14	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain. Wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures.	Section 8.8 of Chapter 8: Ecology and Nature Conservation of this Environmental Statement [EN010106/APP/6.1] provides information on how the project has taken advantage of opportunities to enhance biodiversity. A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 3.0, has been provided in Appendix 8N of the ES [EN010106/APP/6.2] . For the purposes of BNG, the Scheme will result in an overall net gain of approximately 83.51% habitat units, approximately 16.87% hedgerow units and approximately 1.98% of river units for biodiversity, pursuant to the proposals set out in the OLEMP. It is therefore considered that the Scheme has taken advantage of opportunities to conserve and enhance biodiversity and geological features and accords with this policy.
Paragraph 5.4.18	The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works • the timing of construction has been planned to avoid or limit disturbance to birds during the breeding season • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements • habitats will, where practicable, be restored after construction works have finished • mitigation measures should take into account existing habitats and should generally seek opportunities to enhance them, rather than replace them. Where practicable, mitigation measures should seek to create new habitats of value within the site landscaping proposals	Embedded design mitigation measures are outlined in Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] , and described in further detail within the OLEMP (see Appendix 10I of the Environmental Statement [EN010106/APP/6.2] , Framework CEMP (see Appendix 16C of the Environmental Statement [EN010106/APP/6.2]), Framework OEMP (see Appendix 16F of the Environmental Statement [EN010106/APP/6.2]), Framework DEMP (see Appendix 16E of the Environmental Statement [EN010106/APP/6.2]), and the parameters shown on the Works Plans. These include habitat avoidance, creation and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.19	Applicants should consider producing and implementing a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary	The management of Biodiversity throughout the life of the Scheme is covered by the following documents: the OLEMP (see Appendix 10I of the ES [EN010106/APP/6.2]);

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	adverse impacts on biodiversity during the construction and operation stages.	the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]); The Framework OEMP (see Appendix 16F of the ES [EN010106/APP/6.2]); Framework DEMP (see Appendix 16E of the ES [EN010106/APP/6.2]). It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.22	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered for biodiversity net gain should generally be maintained for a minimum period of 30 years.	The management of Biodiversity throughout the life of the Scheme is covered by the following documents: the OLEMP (see Appendix 10I of the ES [EN010106/APP/6.2]); the Framework CEMP (see Appendix 16C of the ES [EN010106/APP/6.2]); The Framework OEMP (see Appendix 16F of the ES [EN010106/APP/6.2]); Framework DEMP (see Appendix 16E of the ES [EN010106/APP/6.2]), all of which are secured via DCO Requirements. It is therefore considered that the Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.

Table 6 Relevant policy requirements relating to flood risk, drainage, water quality and resources

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 5.7.4	Applications for energy projects of 1 hectare or greater in Flood Zone 1 in England or Zone A in Wales and all proposals for energy projects located in Flood Zones 2 and 3 in England or Zones B and C in Wales should be accompanied by a flood risk assessment (FRA). An FRA will also be required where an energy project less than 1 hectare may be subject to sources of flooding other than rivers and the sea (for example surface water), or where the EA, Internal Drainage Board or other body have indicated that there may be drainage problems. This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. Given this and the fact that the land area exceeds 1ha an FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.7.5	The minimum requirements for FRAs are that they should: ▪ be proportionate to the risk and appropriate to the scale, nature and location of the project; ▪ consider the risk of flooding arising from the project in addition to the risk of flooding to the project; ▪ take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; ▪ be undertaken by competent people, as early as possible in the process of preparing the proposal; ▪ consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure; ▪ consider the vulnerability of those using the site, including arrangements for safe access; ▪ consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. Section 2.2 of the FRA outlines the objectives of the FRA as stipulated by the NPS, and these requirements are addressed throughout the FRA. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	the purpose of the decisions being made; ▪ consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; ▪ include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; ▪ consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems; ▪ consider if there is a need to be safe and remain operational during a worst case flood event over the development's lifetime; and ▪ be supported by appropriate data	
Paragraph 5.7.7	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the IPC to reach a decision on the application when it is submitted. The IPC should advise applicants to undertake these steps where they appear necessary, but have not yet been addressed.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The preparation of the FRA, and the ES has included discussions with the EA, LLFAs and IDB. Discussions have been held with the Environment Agency and agreement has been reached regarding methodology, assumptions and data presentation. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.7.9	In determining an application for development consent, the IPC should be satisfied that where relevant: ▪ the application is supported by an appropriate FRA; ▪ the Sequential Test has been applied as part of site selection; ▪ a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level and the Exception Test.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	- the proposal is in line with any relevant national and local flood risk management strategy; - priority has been given to the use of sustainable drainage systems (SuDs) (as required in the next paragraph on National Standards); and - in flood risk areas the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed over the lifetime of the development.	Flood risk has been a consideration as part of the site selection process and this is explained in Appendix 4A: Alternative Sites Assessment of the ES [EN010106/APP/6.2]. Flood risk to the Order limits has been a design consideration, with the design aiming to locate vulnerable Scheme components in the lowest flood risk zones. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones 2 and 3 and only very small areas of solar PV are to be located within flood risk zone 3a with appropriate mitigation. Appropriate flood risk mitigation is also in place for the parts of the Scheme that would be sited in higher risk flood zones. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.7.10	For construction work which has drainage implications, approval for the project's drainage system will form part of the development consent issued by the IPC. The IPC will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any SuDS, including any necessary access rights to property. The IPC should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body, such as an Internal Drainage Board.	As stated in the FRA (Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]) subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. The Drainage Strategy appended to the FRA in Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. These are to be constructed by the Applicant and maintained as part of the operation of the Scheme. Discussions have taken place with the LLFA and IDB regarding drainage provisions and the substations with no concerns raised. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.7.12	The IPC should not consent development in Flood Zone 2 in England or Zone B in Wales unless it is satisfied that the sequential test requirements have been met. It should not consent development in Flood Zone 3 or Zone C unless it is satisfied that the Sequential and Exception Test requirements have been met. The technology-	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. A FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test and the Exception Test.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	specific NPSs set out some exceptions to the application of the sequential test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, but should apply the sequential approach to locating development within the site	Therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.7.13	Preference should be given to locating projects in Flood Zone 1 in England or Zone A in Wales. If there is no reasonably available site in Flood Zone 1 or Zone A, then projects can be located in Flood Zone 2 or Zone B. If there is no reasonably available site in Flood Zones 1 or 2 or Zones A & B, then nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.4 above	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test and all elements of the Exception Test. Therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.7.14	If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3 or Zone C, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes a) and part b) of the Exception Test.
Paragraph 5.7.16	All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed: ▪ it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; ▪ the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and ▪ a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test and all elements of the Exception Test.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.7.18	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This considers the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes. The Drainage Strategy appended to the FRA includes the provision of above ground SuDS in the drainage design. Therefore it is considered that the Scheme is compliant with this policy.
Paragraph 5.7.19	In this NPS, the term Sustainable Drainage Systems (SuDS) refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: ▪ source control measures including rainwater recycling and drainage; ▪ infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities; ▪ filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; ▪ filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed; ▪ basins ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding; and ▪ flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The Drainage Strategy appended to the FRA includes the provision of above ground SuDS in the drainage design. The preparation of the Environmental Statement [EN010106/APP/6.2] has included discussion with the LLFA, EA and IDB on drainage provisions. Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. Currently, it is understood that rainfall within the Order limits will mostly permeate into the ground where it falls with little or no runoff occurring throughout the Order limits. To prevent ponding occurring around the solar PV panels, swales will be constructed to convey surface water to infiltrate in swales or runoff to infiltration ponds to be located throughout the Sites. The Drainage Strategy appended to the FRA in Appendix 9C of the Environmental Statement [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. It is therefore considered that the Scheme is in accordance with this policy.
Paragraph 5.7.21	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The Drainage Strategy appended to the FRA includes the provision of above ground SuDS in the drainage design. The preparation of the Environmental Statement [EN010106/APP/6.2] has included discussion with the LLFA, EA and IDB on drainage provisions.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Currently, it is understood that rainfall within the Order limits will mostly permeate into the ground where it falls with little or no runoff occurring throughout the Order limits. To prevent ponding occurring around the solar PV panels, a series of 0.6m deep swales will be constructed to convey surface water to infiltrate in swales or runoff to infiltration ponds to be located throughout the Sites. The Drainage Strategy appended to the FRA in Appendix 9C of the Environmental Statement [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design.
Paragraph 5.7.22	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The Drainage Strategy appended to the FRA includes the provision of above ground SuDS in the drainage design. The preparation of the ES [EN010106/APP/6.2] has included discussion with the LLFA, EA and IDB on drainage provisions. Currently, it is understood that rainfall within the Order limits will mostly permeate into the ground where it falls with little or no runoff occurring throughout the Order limits. To prevent ponding occurring around the solar PV panels, a series of 0.6m deep swales will be constructed to convey surface water to infiltrate in swales or runoff to infiltration ponds to be located throughout the Sites.
Paragraph 5.7.23	The sequential approach should be applied to the layout and design of the project. More vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS.	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. Infrastructure shown to be at flood risk is to be mitigated through a variety of measures including implementing shallow infiltration SuDS, raising foundations and plinths thus increasing the floor level above a predicted flood, flood storage attenuation and land-management based measures and the application of approved proprietary flood protection systems. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.7.24	Essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur. In addition, any energy projects proposed in Flood Zone 3b the Functional Floodplain (where water has to flow or be stored in times of flood), or Zone C2 in Wales, should only be permitted if the development will not result in a net loss of floodplain storage, and will not impede water flows.	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. A FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. The substation is designed and constructed to remain operational and safe in times of flood. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.7.25	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding. The applicant should take advice from the emergency services when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	As outlined in Chapter 9: Water Environment of the ES [EN010106/APP/6.1], the appointed Contractor would be required to produce an Emergency Response Plan which would provide details of the response to an impending flood, including details of the evacuation and site closedown procedures. This is secured in the Framework CEMP at Appendix 16C of the ES [EN010106/APP/6.2]. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.15.2	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES or equivalent. (See Section 4.2.)	Section 9.6 of Chapter 9: Water Environment of the ES [EN010106/APP/6.1] presents the existing status of the water environment including water quality, water resources and physical characteristics of the water environment. Section 9.8 of Chapter 9: Water Environment of the ES [EN010106/APP/6.1] provides an assessment of the effects on the water environment during the construction, operation and decommissioning stages of the Scheme. This outlines that there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.15.3	The ES should in particular describe: the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and	Section 9.6 of Chapter 9: Water Environment of the ES [EN010106/APP/6.1] describes the baseline conditions of the Order limits and surrounding areas with regards to water quality, including the

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	proposed changes to discharges; - existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment Abstraction Management Strategies); - existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics; and - any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions.	existing quality and physical characteristics of waters nearby and potentially affected by the Scheme. Appendix 9D: Water Framework Directive Assessment of the ES [EN010106/APP/6.2] includes a Water Framework Directive (WFD) Assessment, which assesses impacts on water bodies or protected areas under the WFD and SPZs. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.15.5	The IPC will generally need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework Directive	Appendix 9D: Water Framework Directive Assessment [EN010106/APP/6.2] of the ES provides a WFD Assessment, which confirms that the Scheme is not expected to have an adverse effect on the achievement of the environmental objectives of the WFD. Therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.15.6	The IPC should satisfy itself that a proposal has regard to the River Basin Management Plans and meets the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. The IPC should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline/Estuary management Plans.	Appendix 9D: Water Framework Directive Assessment [EN010106/APP/6.2] of the ES provides a WFD Assessment, which has had regard to the Anglian District River Basin Management Plan. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.15.8	The IPC should consider whether mitigation measures are needed over and above any which may form part of the project application. (See Sections 4.2 and 5.1.) A construction management plan may help codify mitigation at that stage.	Appendix 9D: Water Framework Directive Assessment of the ES [EN010106/APP/6.2] provides a WFD Assessment which discusses the mitigation measures proposed in line with the objectives of the WFD.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2] . Therefore it is considered that the Scheme is compliant with this policy.
NPS EN-5		
Paragraph 2.4.1	Part 2 of EN-1 provides information regarding the Government's energy and climate change strategy including policies for mitigating climate change. Section 4.8 of EN-1 sets out the generic considerations that applicants and the IPC should take into account to help ensure that electricity networks infrastructure is resilient to climate change. As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: ▪ flooding, particularly for substations that are vital for the electricity transmission and distribution network; ▪ effects of wind and storms on overhead lines; ▪ higher average temperatures leading to increased transmission losses; and ▪ earth movement or subsidence caused by flooding or drought (for underground cables).	Section 5.3 of Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] takes into account the effects of climate change, with specific reference to the Burwell substation; including mitigation measures for this risk. The substation site will have no structures that would be occupied; with staff generally attending only at times of inspection and maintenance. Any building compounds will be located within Flood Zone 1, taking into account the current climate change mapping extents. Substations will not be manned unless for maintenance / carrying out works. During a flood event, affected infrastructure will not be accessed until flood waters recede. The flood risk to structures and the risk to people is considered low when incorporating climate change effects. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 2.4.2	Section 4.8 of EN-1 advises that the resilience of the project to climate change should be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Section 5.7 in EN-1).	Section 5 of Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] takes into account the effects of climate change. The flood risk to structures and the risk to people is considered low when incorporating climate change effects and therefore it is considered that the Scheme is compliant with this policy. Furthermore, as outlined in Section 6.7 of Chapter 6: Climate Change of the ES [EN010106/APP/6.1], various climate change resilience

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		measures are embedded within the Scheme and are included within the Framework CEMP (Appendix 16D: Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2]). The Scheme therefore demonstrates a high level of climate resilience built-in from the outset, in line with this part of the policy.
National Planning Policy Framework (NPPF)		
Paragraph 159	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. Infrastructure shown to be at flood risk is to be mitigated through a variety of measures including implementing shallow infiltration SuDS, raising foundations and plinths thus increasing the floor level above a predicted flood, flood storage attenuation and land-management based measures and the application of approved proprietary flood protection systems The substation is designed and constructed to remain operational and safe in times of flood. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 163	If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.	Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes parts a) and b) of the Exception Test. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 164	The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and	Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes parts a) and b) of the Exception Test and it is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	
Paragraph 167	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.	Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes parts a) and b) of the Exception Test. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. Infrastructure shown to be at flood risk is to be mitigated through a variety of measures including implementing shallow infiltration SuDS, raising foundations and plinths thus increasing the floor level above a predicted flood, flood storage attenuation and land-management based measures and the application of approved proprietary flood protection systems. The substation is designed and constructed to remain operational and safe in times of flood. Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. As outlined in Chapter 9: Water Environment of the ES [EN010106/APP/6.1], the appointed Contractor would be required to produce an Emergency Response Plan which would provide details of the response to an impending flood, including details of the evacuation and site closedown procedures. It is therefore considered that the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 169	Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.	Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. Currently, it is understood that rainfall within the Order limits will mostly permeate into the ground where it falls with little or no runoff occurring throughout the Order limits. To prevent ponding occurring around the solar PV panels, a series of 0.6m deep swales will be constructed to convey surface water to infiltrate in swales or runoff to infiltration ponds to be located throughout the Sites. The Drainage Strategy appended to Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. The preparation of the ES [EN010106/APP/6.1] has included discussion with the LLFA, EA and IDB on drainage provisions. Therefore it is considered that the Scheme is compliant with this policy.
Paragraph 174	Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	Chapter 9: Water Environment of the ES [EN010106/APP/6.1] presents the potential for effects on the water environment during the construction, operation and decommissioning of the Scheme. This outlines that there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV8: Flood Risk	All developments and re-developments should contribute to an overall flood risk reduction. The sequential test and exception test will be strictly applied across the district, and new development should normally be located in Flood Risk Zone 1. The modelled flood risk zones as identified in the SFRA and the Environment Agency Flood Maps will inform the	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. Given this and the fact that the land area exceeds 1ha a FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development passes parts a) and b) of the Exception Test. The FRA provides a detailed assessment of the risk of flooding to the Scheme and

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	application of the sequential test. Development will not be permitted where: ▪ It would intensify the risk of flooding during the lifetime of the development taking into account climate change allowances, unless suitable flood management and mitigation measures can be agreed and implemented. ▪ It would increase the risk of flooding of properties elsewhere during the lifetime of the development, taking into account climate change allowances, by additional surface water run-off or by impeding the flow or storage of flood water. ▪ It would have a detrimental effect on existing flood defences or inhibit flood control and maintenance work. ▪ The risk of flooding would cause an unacceptable risk to safety; or ▪ Safe access is not achievable from/to the development during times of flooding, taking into account climate change allowance. A site-specific Flood Risk Assessment, endorsed by the Environment Agency, appropriate to the scale and nature of the development and the risks involved, and which takes account of future climate change, will be required for: ▪ Major and non-minor development proposals in Flood Zones 2 and 3 and 'Modelled Zone 3'; and ▪ Major and non-minor development proposals in Flood Zone 1, on sites of 1 hectare or greater, or where there is evidence of historic flooding set out in the SFRA and/or a Surface Water Management Plan. All applications for new development must demonstrate that appropriate surface water drainage arrangements for dealing with surface water run-off can be accommodated within the site, and that issues of ownership and maintenance are addressed. The use of Sustainable Drainage Systems will be required for new developments in accordance with the Cambridgeshire SuDs Design and Adoption Handbook (or successor document) unless, following an assessment of character and context, soil conditions and/or	concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. Infrastructure shown to be at flood risk is to be mitigated through a variety of measures including implementing shallow infiltration SuDS, raising foundations and plinths thus increasing the floor level above a predicted flood, flood storage attenuation and land-management based measures and the application of approved proprietary flood protection systems. The substation is designed and constructed to remain operational and safe in times of flood. Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. The Drainage Strategy appended to Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. As outlined in Chapter 9: Water Environment of the ES [EN010106/APP/6.1], the appointed Contractor would be required to produce an Emergency Response Plan which would provide details of the response to an impending flood, including details of the evacuation and site closedown procedures. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	engineering feasibility dictate otherwise. SuDS may be incorporated within the Flood Risk Assessment.	
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS4: Reduce Emissions, Mitigate and Adapt to future Climate Change	The Council will support the development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals. Land will not be allocated in Flood Zones 2 and 3 with the exception of allocations for water compatible use. In the towns, where no reasonable site within flood zone 1 is available, allocations in flood zones 2 and 3 will be considered in accordance with PPS25 and the Strategic Flood Risk Assessment (SFRA) and only when the development meets the following criteria: ▪appropriate land at a lower risk is not available ▪there are exceptional and sustainable circumstances for locating the development within such areas ▪the risk can be fully mitigated by engineering and design measures. The council will seek the implementation of Sustainable Urban Drainage Systems into all new developments where technically feasible.	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. Given this and the fact that the land area exceeds 1ha a FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. This demonstrates how the development meets the requirements of the Exception Test. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones. Infrastructure shown to be at flood risk is to be mitigated through a variety of measures including implementing shallow infiltration SuDS, raising foundations and plinths thus increasing the floor level above a predicted flood, flood storage attenuation and land-management based measures and the application of approved proprietary flood protection systems. The substation is designed and constructed to remain operational and safe in times of flood. Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. The Drainage Strategy appended to Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. It is therefore considered that the Scheme is compliant with this policy.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy DM6: Flooding and Sustainable Drainage	Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere. Examples include: rainwater harvesting and greywater recycling, and run-off and water management such as Sustainable Urban Drainage Systems (SUDS) or other natural drainage systems.	Subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. Currently, it is understood that rainfall within the Order limits will mostly permeate into the ground where it falls with little or no runoff occurring throughout the Order limits. To prevent ponding occurring around the solar PV panels, a series of 0.6m deep swales will be constructed to convey surface water to infiltrate in swales or runoff to infiltration ponds to be located throughout the Sites. The Drainage Strategy appended to Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. It is therefore considered that the Scheme is compliant with this policy.
Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively, there are likely to be unacceptable impacts arising from the development on: • surface and groundwater quality;	Chapter 9: Water Environment of the ES [EN010106/APP/6.1] presents the potential for effects on the water environment during the construction, operation and decommissioning of the Scheme. This outlines that there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment. Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] concludes that there will be no permanent significant adverse noise effects from construction and decommissioning works noise on local receptors. Cumulative effects from the operational noise affecting the nearest receptors at Burwell are considered to be limited to minor adverse. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		It is therefore considered that the Scheme is compliant with this policy.
Draft NPS EN-1		
Paragraph 5.8.6	A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • sites of 1 hectare or more • land which has been identified by the EA or NRW as having critical drainage problems • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future • land that may be subject to other sources of flooding (for example surface water) • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems. This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. Given this and the fact that the land area exceeds 1ha an FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.8.7	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project • consider the risk of flooding arising from the project in addition to the risk of flooding to the project • take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow	An FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. Section 2.2 of the FRA outlines the objectives of the FRA as stipulated by the NPS, and these requirements are addressed throughout the FRA. The Drainage Strategy appended to the FRA includes the provision of above ground SuDS in the drainage design as per the requirements of the NPS. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance • consider the vulnerability of those using the site, including arrangements for safe access and escape • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate iv. Demonstrate how the hierarchy of drainage options (refer to PPG Sustainable Drainage Systems section) has been followed. Explain	

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	and justify why the types of Sustainable Drainage Systems and method of discharge have been selected and why they are considered appropriate. Where cost is a reason for not including Sustainable Drainage Systems, provide information to enable comparison with the lifetime costs of a conventional public sewer connection v. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site vi. Describe the multifunctional benefits the sustainable drainage system will provide vii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system viii. Explain how run-off from the completed development will be prevented from causing an impact elsewhere ix. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development • detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere • be supported by appropriate data and information, including historical information on previous events.	
Paragraph 5.8.15	Preference should be given to locating projects in areas of lowest flood risk. The Secretary of State should not consent development in flood risk areas (Flood Zone 2 in England or Zone B in Wales), accounting for all sources of flooding and the predicted impacts of climate change unless they are satisfied that the sequential test requirements have been met. The Secretary of State should not consent development in Flood Zone 3 or Zone C unless they are satisfied that the Sequential and Exception Test requirements have	The Order limits fall within flood zone 1 with small areas included in flood zones 2 and 3. Given this and the fact that the land area exceeds 1ha an FRA is provided at Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]. The FRA provides a detailed assessment of the risk of flooding to the Scheme and concludes that the risk of flooding will not be increased elsewhere as a result of the construction or operation of the Scheme. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	been met. The technology specific NPSs set out some exceptions to the application of the sequential test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.2 above. All projects should apply the sequential approach to locating development within the site.	The FRA also demonstrates how the development passes the Sequential Test including its application at the site level and the Exception Test. Flood risk has been a consideration as part of the site selection process and this is explained in Appendix 4A: Alternative Sites Assessment of the ES [EN010106/APP/6.2].
Paragraph 5.8.16	If, following application of the sequential test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied, as required by table 3 of the Planning Practice Guidance. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	An FRA is included in Appendix 9C of the Environmental Statement [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test and all elements of the Exception Test. Flood risk has been a consideration as part of the site selection process and this is explained in Appendix 4A: Alternative Sites Assessment of the ES [EN010106/APP/6.2]. It is therefore considered that the Scheme is compliant with tis policy.
Paragraph 5.8.17	The Exception Test is only appropriate for use where the sequential test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the sequential test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.	A FRA is included in Appendix 9C of the Environmental Statement [EN010106/APP/6.2] This demonstrates how the development passes the Sequential Test and all elements of the Exception Test. Flood risk has been a consideration as part of the site selection process and this is explained in Appendix 4A: Alternative Sites Assessment of the ES [EN010106/APP/6.2]. It is therefore considered that the Scheme is compliant with tis policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.8.18	Both elements of the test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: - the project provides wider sustainability benefits to the community that outweigh flood risk - the project reduces flood risk overall, where possible	A FRA is included in Appendix 9C of the Environmental Statement [EN010106/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level and the Exception Test. Flood risk to the Order limits has been a design consideration, with the design aiming to locate vulnerable Scheme components in the lowest flood risk zones. Through the sequential process and design iterations, all operational compounds and battery storage units have been located out of flood zones 2 and 3 and only very small areas of solar PV are to be located within flood risk zone 3a with appropriate mitigation. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.16.3	Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation.	As stated in the FRA (Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2]) subject to a geotechnical investigation, in which groundwater monitoring and infiltration testing is conducted, it is proposed to remove any surface water runoff generated within the Order limits via infiltration techniques. The Drainage Strategy appended to the FRA in Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes further details of the provision of above ground SuDS in the drainage design. These are to be constructed by the Applicant and maintained as part of the operation of the Scheme. Therefore it is considered that the Scheme is compliant with this policy.
Paragraph 5.16.4	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in Water Resource Management Plans - this could include, for example, the use of protective barriers.	An FRA is included in Appendix 9C of the Environmental Statement [EN010106/APP/6.2]. The construction of the Scheme would take place under a CEMP. The CEMP details the measures that would be undertaken during construction to mitigate the temporary effects on the water environment. A Framework CEMP is provided in Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. The CEMP will comprise good practice methods which would also focus on managing

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		the risk of pollution to surface waters and the groundwater environment. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.16.5	The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment Abstraction Management Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions	The ES section 9.6 of Chapter 9: Water Environment [EN010106/APP/6.1] sets out the baseline conditions of water receptors for all the sites and surrounding areas with regards to water quality, including the existing quality and physical characteristics of waters nearby and potentially affected by the Scheme. Section 9.8 of Chapter 9: Water Environment of the ES [EN010106/APP/6.1] outlines the assessment of likely impacts and effects to water bodies within the area of the DCO sites. Appendix 9D: Water Framework Directive Assessment of the ES [EN010106/APP/6.2] includes a Water Framework Directive (WFD) Assessment, which assesses impacts on water bodies or protected areas under the WFD and SPZs. It is therefore considered that the Scheme is compliant with this policy.
Draft NPS EN-3		
Paragraph 2.50.7	The applicants assessment may be accompanied by a Flood Risk Assessment. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not in general be significant. Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches,	An FRA is included in Appendix 9C of the Environmental Statement [EN010106/APP/6.2]. The FRA is accompanied by a Drainage Strategy appended to Appendix 9C: Flood Risk Assessment of the ES [EN010106/APP/6.2] includes details of the provision of above ground SuDS in the drainage design. The Scheme design has sought

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	should be used to control any run-off where recommended. Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses. Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, it should be demonstrated that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	to minimise the requirement for culverting for access. It is therefore considered that the Scheme is compliant with this policy.

Table 7 Relevant policy relevant to noise and vibration

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 5.11.1	Excessive noise can have wide-ranging impacts on the quality of human life, health (for example owing to annoyance or sleep disturbance) and use and enjoyment of areas of value such as quiet places and areas with high landscape quality. The Government's policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to "noise" below apply equally to assessment of impacts of vibration.	Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] recognises and assesses the impacts of noise and vibration of the Scheme on health and quality of life. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.2	Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed by the IPC in accordance with the Biodiversity and Geological Conservation section of this NPS	Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] Includes an assessment of the likely impacts and effects of noise on relevant ecological features. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.3	Factors that will determine the likely noise impact include: ▪ the inherent operational noise from the proposed development, and its characteristics; ▪ the proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces); ▪ the proximity of the proposed development to quiet places and other areas that are particularly valued for their acoustic environment or landscape quality; and ▪ the proximity of the proposed development to designated sites where noise may have an adverse impact on protected species or other wildlife.	Section 11.4 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] and its supporting appendices explain the noise and vibration assessment methodology which has considered the factors identified by this policy. Table 11-5 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] describes the noise sensitive premises and areas that have been identified. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Noise from the construction, operation and decommissioning of the Scheme is considered throughout Chapter 11: Noise & Vibration and therefore it is considered that the Scheme is compliant with this policy. Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] Includes an assessment of the likely impacts and effects of noise on designated ecological sites. Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] considers the impact of the Scheme on tranquillity in its assessments.
Paragraph 5.11.4	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: ▪ a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise; ▪ identification of noise sensitive premises and noise sensitive areas that may be affected; ▪ the characteristics of the existing noise environment; ▪ a prediction of how the noise environment will change with the proposed development; ▪ in the shorter term such as during the construction period; ▪ in the longer term during the operating life of the infrastructure; ▪ at particular times of the day, evening and night as appropriate. ▪ an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas; and ▪ measures to be employed in mitigating noise. The nature and extent of the noise assessment should be proportionate to the likely noise impact.	Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] presents a noise assessment in accordance with this policy. Table 11-5 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] describes the noise sensitive premises and areas that may be affected. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] states that plant associated with the solar stations and BESS will be selected and designed to minimise any tonal, impulsive or intermittent characteristics. Section 11.6 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] outlines the characteristics of the existing noise environment for the Scheme and surrounding areas. Section 11.8 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		(including tonality), including at particular times of the day and at night, on the noise sensitive premises and areas outlined in Table 11-5 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1]]. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2]. The draft DCO [EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features.
Paragraph 5.11.5	The noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should also be considered.	The construction noise assessments presented in Section 11.8 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] include the assessment of noise resulting from road traffic movements (with there being no rail movements assumed) generated during construction. Traffic movements during operation are not assessed due to there being only 17 staff carrying out operational activities. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.6	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology-specific NPSS. In particular, for renewables (EN-3) and electricity networks (EN-5) there	Section 11.8 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] assesses operational noise with respect to human receptors.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.	As outlined in Section 11.4 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] , operational noise from fixed plant associated with the Scheme has been assessed following British Standards 4142 guidance, whereby the rating level of noise emissions from activities are compared against the background level of the pre-development noise climate. Assessment of construction and decommissioning noise has been assessed in line with Annex E of British Standards 5228-1. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.7	The applicant should consult EA and Natural England (NE), or the Countryside Council for Wales (CCW), as necessary and in particular with regard to assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	The EA and Natural England have been consulted throughout the preparation of the ES [EN010106/APP/6.1] . It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.8	The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.	As outlined in Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] , no specific noise mitigation measures have been included for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features. In addition, operational plant is generally not located near to receptors. Therefore it is considered that the Scheme is compliant with this policy.
Paragraph 5.11.9	The IPC should not grant development consent unless it is satisfied that the proposals will meet the following aims: ▪ avoid significant adverse impacts on health and quality of life from noise; ▪ mitigate and minimise other adverse impacts on health and quality of life from noise; and ▪ where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	Table 11-17 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] and [CROSS REF] of Chapter XX: Health concludes there are no anticipated significant adverse effects on health and quality of life arising from the noise or vibration impacts from the construction, decommissioning or operation of the Scheme, including effects on health and quality of life from noise. The Scheme therefore accords with the first part of the policy aims. In response to the second part of the policy aims, Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2]. The draft DCO[EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features which responds positively to the third policy aim. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.11.11	The IPC should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the IPC may wish to impose requirements. Any such requirements should take account of the guidance set out in Circular 11/95 (see Section 4.1) or any successor to it.	Given the outcome of the noise and vibration assessment for the Scheme and the proposed mitigation it is not anticipated that the Secretary of State will need to consider additional mitigation measures and therefore it is considered that the Scheme is compliant with this policy.
Paragraph 5.11.12	Mitigation measures may include one or more of the following: ▪ engineering: reduction of noise at point of generation and containment of noise generated; ▪ lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings; and ▪ administrative: restricting activities allowed on the site; specifying acceptable noise limits; and taking into account seasonality of wildlife in nearby designated sites.	Given the outcome of the noise and vibration assessment for the Scheme and the proposed mitigation it is not anticipated that the Secretary of State will need to consider additional mitigation measures and therefore it is considered that the Scheme is compliant with this policy.
NPS EN-3		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 2.4.2	Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.	The detailed design of the Scheme will be undertaken post consent however the operational noise assessment has considered the potential siting of plant in accordance with the parameters set by the Works Plans [EN010106/APP/2.2]. Given the results of the operational noise assessment no specific noise mitigation measures are required for operational plant which therefore illustrates the good design principles the Applicant is proposing with regard to mitigating noise impacts. Based on the proposed plant installations the Applicant is however committed to going further and designing and selecting plant which will have no tonal, impulsive or intermittent features. It is therefore considered that the Scheme is compliant with this policy.
NPS EN-5		
Paragraph 2.9.7	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] has assessed the impacts of all aspects of the Scheme including substations in accordance with this policy.
National Planning Policy Framework (NPPF)		
Paragraph 174	Planning policies and decisions should contribute to and enhance the natural and local environment by:.....e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	Table 11-17 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] explains there are no anticipated unacceptable impacts arising from the noise or vibration impacts of the construction, decommissioning or operation of the Scheme as no significant adverse effects are predicted. To manage adverse effects during construction Section 11.7 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures will be included within a Decommissioning Environmental Management Plan which will be implemented prior to the decommissioning phase. A Framework DEMP is provided at provided at Appendix 16E of the ES [EN010106/APP/6.2]. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 185	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and 	Table 11-17 of Chapter 11: Noise & Vibration and Table 15-6 of Chapter 15: Health of the ES [EN010106/APP/6.1] concludes there are no anticipated significant adverse effects arising from the noise or vibration impacts from the construction, decommissioning or operation of the Scheme, including effects on health and quality of life from noise. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2]. The draft DCO[EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] considers the impact of the Scheme on tranquillity in its assessments. Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features. It is therefore considered that the Scheme is compliant with this policy.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV9: Pollution	All development proposals should minimise, and where possible, reduce all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in air and water quality. All applications for development where pollution is suspected must contain sufficient information to enable the Council to make a full assessment of potential hazards and impacts. Proposals will be refused where, individually or cumulatively, there are unacceptable impacts arising from the development on: ▪The natural environment, general amenity and the tranquillity of the wider rural area, including noise and light pollution.. In exceptional cases, development proposals may be permitted where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development substantially outweigh any adverse impact in terms of pollution. In such cases, where pollution is unavoidable, mitigation measures to reduce pollution levels will be required in order to meet acceptable standards.	Table 11-17 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] explains there are no anticipated unacceptable impacts arising from the noise or vibration impacts of the construction, decommissioning or operation of the Scheme as no significant adverse effects are predicted. There are potentially significant cumulative adverse effects from construction noise during the construction phase. To minimise the potential for cumulative effects the Scheme will have a designated Site Manager during construction who will liaise with these other developments to identify measures that can be undertaken to minimise disruptions and noise effects. Cumulative effects from the operational noise affecting the nearest receptors at Burwell are considered to be limited to minor adverse. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2]. The draft DCO[EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		of the Scheme; therefore the Scheme is unlikely to lead to a breach of any statutory air quality limits. Mitigation measures pertaining to air quality are incorporated into the CEMP for the Scheme and are summarised in Table 14-12 and Table 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM2:Creating Places - Development Principles and Local Distinctiveness	Proposals for all development (including changes of use, shopfronts, and the display of advertisements) should, as appropriate: g. taking mitigation measures into account, not affect adversely: iv. sites, habitats, species and features of ecological interest; v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or vi. residential amenity;	Table 11-17 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] explains there are no anticipated unacceptable impacts arising from the noise or vibration impacts of the construction, decommissioning or operation of the Scheme as no significant adverse effects are predicted. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2] The draft DCO[EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Section 8.8 of Chapter 8: Ecology of the ES [EN010106/APP/6.1] Includes an assessment of the likely impacts and effects of noise on relevant ecological features. This concludes that there are no impact pathways, either directly or indirectly, that would impact upon the integrity or functioning of any statutory designated sites.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant. However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features. It is therefore considered that the Scheme is compliant with this policy.
Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively, there are likely to be unacceptable impacts arising from the development on: • the natural environment, general amenity and the tranquillity of the wider rural area;.....	Chapter 9: Water Environment of the ES [EN010106/APP/6.1] presents the potential for effects on the water environment during the construction, operation and decommissioning of the Scheme. This outlines that there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment. Table 11-17 of Chapter 11: Noise & Vibration of the ES [EN010106/APP/6.1] explains there are no anticipated unacceptable impacts arising from the noise or vibration impacts of the construction, decommissioning or operation of the Scheme as no significant adverse effects are predicted. Cumulative effects from the operational noise affecting the nearest receptors at Burwell are considered to be limited to minor adverse. Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] sets out that noise mitigation measures during the construction of the Scheme will be according to Best Practical Means that are included within the Framework CEMP provided at Appendix 16C of the ES [EN010106/APP/6.2]. Mitigation measures to be implemented during the decommissioning phase are set out in the Framework DEMP which is provided at Appendix 16E of the ES [EN010106/APP/6.2]. The draft DCO [EN010106/APP/3.1] proposes requirements to provide a detailed CEMP and DEMP post consent. Given the results of the operational noise assessment no specific noise mitigation measures are proposed for operational plant.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		However, based on the proposed plant installations the Applicant is committed to designing and selecting plant which will have no tonal, impulsive or intermittent features. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Draft NPS EN-1		
Paragraph 5.12.4	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive, low frequency or temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction of how the noise environment will change with the proposed development • in the shorter term, such as during the construction period o in the longer term, during the operating life of the infrastructure • at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year • an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and well-being where appropriate, and noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise	Sensitive receptors are described in Table 11-1 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] . The existing noise environment has been established by baseline surveys, presented in section 11.6 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] . Section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] states that plant associated with the solar stations and BESS will be selected and designed to minimise any tonal, impulsive or intermittent characteristics. The impacts and effects associated with the construction/decommissioning and operational phases of the Scheme are presented in section 11.8 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1]. Mitigation measures are described in sections 11.7 and 11.9 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1]. Section 11.7 sets out the embedded design mitigation measures for both the construction/decommissioning and operational phases of

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	measures to be employed in mitigating the effects of noise - applicants should consider using best available techniques to reduce noise impacts	the Scheme. Section 11.9 considers the requirements of the NPSE and Planning Practice Guidance (PPG). Underwater or subterranean noise is not applicable to the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.12.8	Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult EA and/or the SNCB, as necessary, and in particular with regard to assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	Chapter 8: Ecology of the ES [EN010106/APP/6.1] assesses the likely significant effects of the Scheme on protected species and other wildlife. The assessment takes account of noise impact and concludes that no significant effects arise. The Environment Agency have been consulted by the Applicant both within and outside of Statutory Consultation. The Environment Agency also provided an EIA scoping response, which the Applicant has taken into account.

Table 8 Relevant policy requirements relating to socio-economics, human health and land use

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 4.13.2	As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on human beings, the ES should assess these effects for each element of the project, identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant and the IPC should consider the cumulative impact on health.	Chapter 15: Human Health of the ES [EN010106/APP/6.1] contains a human health impact assessment that assesses the effects of the Scheme on human beings during the construction, operation and decommissioning phases of the Scheme. Section 15.10 of Chapter 15: Human Health of the ES [EN010106/APP/6.1] outlines the cumulative impacts on health.
Paragraph 4.13.3	The direct impacts on health may include increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.	Section 15.8 of Chapter 15: Human Health of the ES [EN010106/APP/6.1] assesses the impacts of a variety of health and well-being determinants listed in the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Fourth Edition 2019, which is generally considered as a best practice tool to use when undertaking health and well-being impact assessments. This includes the effects of traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.
Paragraph 4.13.4	New energy infrastructure may also affect the composition, size and proximity of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport or the use of open space for recreation and physical activity.	Three PRoWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. there is PRoW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington. These will be temporarily severed during the construction

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		phase, creating a potential moderate adverse impact on users without appropriate mitigation. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRoWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. The Scheme is not anticipated to have any indirect health impacts or include any proposals that affect access to public services. It is therefore considered that the Scheme accords with this policy.
Paragraph 4.13.5	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refused consents or require specific mitigation under the Planning Act 2008. However, the IPC will want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	Mitigation measures have been embedded within the Scheme design to reduce operational effects such as noise, air quality and landscape, in turn these measures will mitigate the effects on the local community and existing facilities from a human health perspective.
Paragraph 5.10.2	The Government's policy is to ensure there is adequate provision of high quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change.	The Scheme is not anticipated to have an effect on open space or recreational facilities. Three PRoWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. there is PRoW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington. These will be temporarily severed during the construction phase, creating a potential moderate adverse impact on users without appropriate mitigation. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRowS during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. It is therefore considered that the Scheme accords with this policy.
Paragraph 5.10.3	Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure.	This policy accepts that previously developed land may not be possible to use for many forms of infrastructure, as in the case of this Scheme.
Paragraph 5.10.5	The ES (see Section 4.2) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan.	Appendix 5A: Cumulative Schemes of Chapter 5: EIA Methodology provides a shortlist of cumulative schemes that are considered as part of the cumulative assessment, which is presented in Chapters 6 to 16 of the Environmental Statement. This assessment concludes that there are no significant cumulative effects. Section 2.6 of the Planning Statement [EN010106/APP/7.2] considers the impact on planning permissions and allocation in and near to Order Limits. Section 12.6 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] identifies the existing

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		baseline land use and socio-economic conditions for the Order limits. Section 3 of the Planning Statement [EN010106/APP/7.2] sets out the principle components of the Scheme and the key activities for its operation, construction and decommissioning.
Paragraph 5.10.6	Applicants will need to consult the local community on their proposals to build on open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.	The Scheme does not include any proposals to build on open space, sports or recreational buildings and land.
Paragraph 5.10.8	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.	As detailed in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], the Scheme will construction work at the Sites will result in the temporary suspension of agricultural management of the land. Of the 37.9ha of BMV land within the Sites, approximately 31.4ha will house solar infrastructure. The remaining approximately 6.5ha of the BMV land not built on will form part of the native grassland planting throughout the Sites. The development of farm land for solar power generation and the cable route corridor involves little disturbance of the soil and retention of the land resource for future use. Embedded design mitigations reduce the potential for adverse impacts against soils and the agricultural land resource. None of the sites for the BESS or compounds will fall within BMV land. The land resource that is to house the solar infrastructure will not be lost or degraded.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		The land resource that is to house the solar infrastructure will not however be lost or degraded, because the soil resource will remain in an undisturbed state below and between solar panels, with a forage crop. As such the Scheme would not give rise to the loss of any BMV land. During operation of the Scheme the agricultural land resource can return to supporting agricultural production, grazing sheep. The land resource will not be lost or degraded during the operation of the Scheme
Paragraph 5.10.9	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place	The Order limits lie within the Worlington Quarry and Barton Mills Chalk quarry safeguarding zones identified in the Suffolk Minerals and Waste Local Plan July 2020. As stated in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], mineral deposits within Minerals Safeguarding Areas will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning. As explained in Section 2.6 of the main text of the Planning Statement [EN010106/APP/7.2], the Section of Worlington Quarry that is within Order Limits has been identified by the Quarry owner as being either barren or contains mineral not of sufficient quality or quantity to be economically viable. The Scheme will therefore not sterilise any mineral in the Quarry that would otherwise be likely to be extracted. However, as the overlap area is still subject to the restoration conditions on the

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Worlington Quarry planning permission, there is a need to disapply those conditions in respect of the overlap area only. This is achieved through the draft DCO.
Paragraph 5.10.13	Where the project conflicts with a proposal in a development plan, the IPC should take account of the stage which the development plan document in England or local development plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document in England or local development plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.	As illustrated in Section 2.6 of the main text of the Planning Statement [EN010106/APP/7.2] , the Scheme does not conflict with any proposals in a development plan.
Paragraph 5.10.14	The IPC should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the IPC determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. The loss of playing fields should only be allowed where applicants can demonstrate that they will be replaced with facilities of equivalent or better quantity or quality in a suitable location.	The Scheme does not affect any existing open space, sports and recreational buildings or land.
Paragraph 5.10.15	The IPC should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.	As detailed in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] , construction work at the Sites will result in the temporary suspension of agricultural management of the land. Of the 37.9ha of BMV land within the Sites, approximately 31.4ha will house solar infrastructure during the operational phase. The remaining approximately 6.5ha of the BMV land not built on will form part of the native grassland planting throughout the Sites. Appendix 12B: Soils and Agriculture Baseline Report of the ES [EN010106/APP/6.2] identifies the various grades of agricultural land across the Sites

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		as a result of soil surveys undertaken. It explains that 96% of the land within the Sites falls within grade 3b, 4 and 5 with some non-agricultural land uses also present. The Scheme's location maximises the use of poorer quality agricultural land and will not result in the permanent loss of BMV land due to the Scheme being decommissioned following 40 years of operation. Agricultural use of the land will continue, with sheep grazing proposed. Leaving the land fallow for 40 years will also provide benefits in terms of improving soil quality which the ES identifies is a significant beneficial effect of the Scheme. None of the sites for the BESS or compounds will fall within BMV land. The land resource that is to house the solar infrastructure will not be lost or degraded, because the soil resource will remain in an undisturbed state below and between solar panels, with a forage crop.
Paragraph 5.10.19	Although in the case of much energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some at least of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project.	As outlined in Section 6.3 of the Planning Statement [EN010106/APP/7.2] , the Scheme has undergone an iterative design development process which addresses the key opportunities and challenges of the Scheme and the context and setting within which it is located. The design team has worked collaboratively to provide an integrated and responsive design which has been informed by stakeholder engagement. As a result of this process a Scheme has been developed that is sensitive to local character.
Paragraph 5.10.24	Rights of way, National Trails and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The IPC	As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] , the use

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other rights of way. Where this is not the case the IPC should consider what appropriate mitigation requirements might be attached to any grant of development consent.	of PRowS will be retained during operation. Appropriate measures to mitigate temporary impacts on users of PRowS during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users and therefore it is considered that the Scheme complies with this policy.
Paragraph 5.12.2	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2).	Section 12.8 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an assessment of socio-economic impacts at local and regional levels, including employment, the local economy, users of Public Rights of Way (PRow), residential properties, business properties and community facilities. It is therefore considered that the Scheme accords with this policy.
Paragraph 5.12.3	This assessment should consider all relevant socio-economic impacts, which may include: ▪ the creation of jobs and training opportunities; ▪ the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; ▪ effects on tourism; ▪ the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and ▪ cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. The impact of permanent long-term employment loss following decommissioning has been assessed as a permanent very low adverse, which is not considered significant.

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	potential shortage of construction workers to meet the needs of other industries and major projects within the region.	Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] considers cumulative effects within its assessment of the above socio-economic factors. It is therefore considered that the Scheme accords with this policy.
Paragraph 5.12.4	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	The current socio-economic baseline conditions of the study area has been described in Section 12.6 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme accords with this policy.
Paragraph 5.12.8	The IPC should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.	As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PROWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. The development of farm land for solar power generation involves little disturbance of the soil and retention of the land resource for future use. These embedded design mitigations reduce the potential for adverse impacts against soils and the agricultural land resource. Primary mitigation measures are embedded within the Scheme, these measures are set out in the respective chapters, to reduce other construction and operational effects (such as noise, air quality, transport and landscape) which in turn will mitigate the effects on the local community and existing

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		facilities from a socio-economic and land use perspective. To help maximise the positive gain for the local economy from the beneficial significant effect arising from employment generation during the construction phase, a Skills, Supply Chain and Employment Plan will be implemented. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO. An Outline Skills, Supply Chain and Employment Plan is included with this Application [EN010106/APP/7.8].
Paragraph 5.12.9	The IPC should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	Temporary significant adverse residual effects have been assessed on users of two PRowWs during both the construction and decommissioning phases of the Scheme. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRowWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. To help maximise the positive gain for the local economy from the beneficial significant effect arising from employment generation during the construction phase, a Skills, Supply Chain and Employment Plan will be implemented. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO. An Outline Skills, Supply Chain and

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		Employment Plan is included with this Application [EN010106/APP/7.8]. Primary mitigation measures are embedded within the Scheme, these measures are set out in the respective chapters, to reduce other construction and operational effects (such as noise, air quality, transport and landscape) which in turn will mitigate the effects on the local community and existing facilities from a socio-economic and land use perspective.
NPS EN-5		
Paragraph 2.3.5	The IPC should also take into account that National Grid, as the owner of the electricity transmission system in England and Wales, as well as Distribution Network Operators (DNOs), are required under section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design, taking into account current and reasonably anticipated future generation demand. National Grid is also required to facilitate competition in the supply and generation of electricity and so has a statutory duty to provide a connection whenever or wherever one is required.	Sunnica Limited has secured a connection to the National Grid at Burwell substation. Further details of this are included in the Grid Connection Statement [EN010106/APP/7.4] .
National Planning Policy Framework (NPPF)		
Paragraph 81	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.	The assessment contained in Chapter 12 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the

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		proposal. The impact of permanent long-term employment loss following decommissioning has been assessed as a permanent very low adverse, which is not considered significant. It is therefore considered that the Scheme accords with this policy.
Paragraph 84	Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	Chapter 12 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] concludes that there would be no adverse effect on residential properties, business properties or community facilities as a result of the construction, operation or decommissioning of the Scheme.
Paragraph 92	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	Chapter 15: Human Health of the ES [EN010106/APP/6.1] contains a Human Health and Wellbeing Assessment (HHA), which concludes that during the operational phase, the Scheme will provide additional NMU facilities which will improve safety and reduce journey times for some NMUs. The Scheme is therefore expected to lead to a positive health and wellbeing impact during the operational phase. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRoWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. It is therefore considered that the Scheme accords with this policy.

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Paragraph 93	To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: ...; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;...	Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] concludes that there would be no adverse effect on residential properties, business properties or community facilities as a result of the construction, operation or decommissioning of the Scheme. The HHA contained within Chapter 15: Human Health of the ES [EN010106/APP/6.1] concludes that during the operational phase, the Scheme will provide additional NMU facilities which will improve safety and reduce journey times for some NMUs. The Scheme is therefore expected to lead to a positive health and wellbeing impact during the operational phase.
Paragraph 98	Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate	The Scheme is not anticipated to have an effect on open space or recreational facilities.
Paragraph 100	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	Three PRoWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. there is PRoW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends

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		northwards from Elms Road to Worlington. These will be temporarily severed during the construction phase, creating a potential moderate adverse impact on users without appropriate mitigation. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRowS during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. It is therefore considered that the Scheme accords with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy Growth 1: Levels of housing, employment and retail growth	In the period 2011 to 2031, the District Council will: ... ▪ Maximise opportunities for jobs growth in the district, with the aim of achieving a minimum of 9,200 additional jobs in East Cambridgeshire. Part of this strategy will involve making provision for a deliverable supply of at least 179 ha of employment land for B1/B2/B8 uses, and providing for home working. In the period 2012 to 2031, the District Council will: ▪ Make provision for at least an additional 3,000m² (net) of convenience and 10,000m² (net) of comparison retail floorspace in the district.	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, spanning areas within the jurisdiction of West Suffolk Council and East Cambridgeshire District Council, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. It is therefore considered that the Scheme accords with this policy.

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Policy EMP6: Development affecting the horse racing industry	Any development which is likely to have an adverse impact on the operational use of an existing site within the horse racing industry, or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted.	Appendix 16A of the ES [EN010106/APP/6.1] presents an assessment of the effects of glint and glare arising from the Scheme which is summarised in Chapter 16: Other Environmental Topics of the ES [EN010106/APP/6.1]. This concludes that horse racing facilities in the vicinity of the Order limits will not experience any significant adverse effects due to visibility of any panels being screened from view by existing vegetation and landform as well as the proposed mitigation planting. Prior to the planting being established the assessment concludes that these facilities would experience a low impact in terms of glint and glare due to the location of the solar reflection and reflections coinciding with direct sunlight. Engagement with Godolphin Management Group has led to the Applicant proposing temporary measures to minimise disturbance to horse racing uses abutting the boundary of Sunnica West Site A. Measures embedded into the design include not undertaking construction works within fields adjacent to 'The Gallops' on Sunnica West Site A prior to 10am to limit disruption to their horse training activities. This has been secured through the Framework CEMP at Appendix 16C of the ES [EN010106/APP/6.2]. Temporary fencing is also proposed to be installed locally along the boundary of Sunnica West Site A to screen views until the establishment of the proposed planting. Therefore, it is considered that the Scheme will not have adverse impacts on the horse racing industry as a whole.
Policy ENV6: Renewable Energy Development	Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be	As outlined in Section 8.9 and 8.10 of Chapter 8: Ecology of the ES [EN010106/APP/6.1], there are

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	outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to: • The local environment and visual landscape impact. • Impact on the character and appearance of the streetscape/buildings. • Key views, in particular those of Ely Cathedral. • Protected species. • Residential amenity. • Safeguarding areas for nearby airfields; and • Heritage assets.	anticipated to be no potential for significant adverse effects on any designated ecological sites, habitats or protected species. As outlined in Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1], the Scheme is considered to be designed carefully and sensitively with regards to siting, ensuring that landscape impacts are minimised where possible and protecting the local landscape in accordance with this policy. Chapter 16: Other Environmental Effects of the ES [EN010106/APP/6.1] includes a glint and glare assessment, which concludes that no reflections are predicted for aviation receptors at RAF Mildenhall and no effects are anticipated for receptors at RAF Lakenheath due to their distance from the Scheme and orientation of the runways. Therefore, no impact is anticipated on these receptors, which is not significant. Appendix D of the Planning Statement [EN010106/APP/7.2] sets out the harm predicted upon designated heritage assets, including their value. This concludes that designated assets affected by the Scheme will experience less than substantial harm with the majority of them experiencing less than substantial harm at the lower end of the spectrum due to the very low and low impacts of the Scheme.
Forest Heath District Council Core Strategy Adopted 2010		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy CS6: Sustainable Economic and Tourism Development.	Provision will be made for development that will aim to deliver a minimum of 7,300 additional jobs in the District by 2026. Job growth will be achieved via the provision of employment land, as well as policies for tourism, leisure, retail and the rural economy. A minimum of 16 hectares of additional employment land will be allocated between 2006 and 2026 to provide business (B1), general industrial (B2), and distribution uses (B8) to achieve a mix and range of sites and a balanced economy.	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, spanning areas within the jurisdiction of West Suffolk Council and East Cambridgeshire District Council, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the Scheme. It is therefore considered that the Scheme accords with this policy.
Policy CS10: Sustainable Rural Communities	The diversification of existing rural enterprises and the development of new enterprises where a rural location is either environmentally or operationally justified will be supported, provided there are no significant detrimental environmental, landscape, conservation or highway impacts.	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. Chapter 12 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] concludes that there would be no adverse effect on business properties as a

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		result of the construction, operation or decommissioning of the Scheme.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		
Policy DM30: Appropriate Employment Uses and Protection of Employment Land and Existing Businesses	Any non-employment use proposed on sites and premises used and/or designated on the policies maps for employment purposes, and that is expected to have an adverse effect on employment generation, will only be permitted where the local planning authority is satisfied that the proposal can demonstrate that it complies with other policies in this and other adopted local plans (particularly Policies DM1 and DM2 in this Plan), and one or more of the following criteria has been met (as appropriate to the site/premises and location): a. there is a sufficient supply of alternative and suitable employment land available to meet local employment job growth requirements; b. evidence can be provided that genuine attempts have been made to sell/let the site in its current use, and that no suitable and viable alternative employment uses can be found or are likely to be found in the foreseeable future; c. the existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site; d. an alternative use or mix of uses would assist in urban regeneration and offer greater benefits to the community in meeting local business and employment needs; e. it is for an employment related support facility such as employment training/education, workplace crèche or industrial estate café; f. an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site.	During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, spanning areas within the jurisdiction of West Suffolk Council and East Cambridgeshire District Council, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. It is therefore considered that the Scheme is compliant with this policy.
Policy DM41: Community Facilities and Services	The provision and enhancement of community facilities and services will be permitted where they contribute to the quality of community life and the maintenance of sustainable communities. Proposals that will result in the loss of valued facilities or services which support a local community (or premises last used for such purposes) will only be permitted where:	There are anticipated to be no loss of community facilities as a result of the construction, operation or decommissioning of the Scheme.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	a. it can be demonstrated that the current use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months; and b. it can be demonstrated that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or c. alternative facilities and services are available or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking.	
Policy DM44: Rights of Way	Development which would adversely affect the character of, or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist, or horse rider use. Improvements to such rights of way will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate and to achieve the objectives of the Suffolk Rights of Way Improvement Plan.	Three PRoWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. there is PRoW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington. These will be temporarily severed during the construction phase, creating a potential moderate adverse impact on users without appropriate mitigation. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRoWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. It is therefore

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		considered that the Scheme is compliant with this policy.
Suffolk County Council Minerals & Waste Local Plan Adopted 2020		
Policy MP10: Mineral consultation and safeguarding areas	The County Council will safeguard: a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development; However, as the overlap area is still subject to the restoration conditions on the Worlington Quarry planning permission, there is a need to disapply those conditions in respect of the overlap area only. This is achieved through the draft DCO. b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The MPA will advise the Local Planning Authority whether any proposed development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working. District and Borough Councils should consult the County Council when a proposal falls within the Minerals Consultation Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response. Responsibility for any mitigation required falls on the development that receives planning permission last	The Order limits lie within the Worlington Quarry and Barton Mills Chalk quarry safeguarding zones identified in the Suffolk Minerals and Waste Local Plan July 2020. Mineral deposits within Minerals Safeguarding Areas will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning. As explained in Section 2.6 of the main text of the Planning Statement, the Section of Worlington Quarry that is within Order Limits has been identified by the Quarry owner as being either barren or contains mineral not of sufficient quality or quantity to be economically viable. The Scheme will therefore not sterilise any mineral in the Quarry that would otherwise be likely to be extracted.
Policy WP18: Safeguarding of waste management sites	The County Council will seek to safeguard existing sites and sites proposed for waste management use as shown on the Proposals & Safeguarding Maps and will object to development proposals that would prevent or prejudice the use of such sites for those purposes unless suitable alternative provision is made. Development proposals in close proximity to existing sites, should demonstrate that they would not prejudice or be prejudiced by a waste management facility.	The Scheme would not significantly affect existing or safeguarded waste sites. Appendix 5A: Cumulative Schemes of Chapter 5: EIA Methodology provides a shortlist of cumulative schemes that are considered as part of the

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	The safeguarding policy will also apply to any site where planning permission has already been granted. Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development. District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response.	cumulative assessment, which is presented in Chapters 6 to 16 of the Environmental Statement.
Policy MS10: Worlington	Development will be acceptable so long as the proposals, adequately address the following: a) mitigation of landscape and visual impacts including the retention where possible of the characteristic tree belts; b) a programme of archaeological investigation, which will include assessment of, and provide mitigation strategies for, near surface archaeological potential and Palaeolithic potential (at depth); c) potential impacts upon nature conservation interest including Breckland SPA, Breckland SAC, Breckland Flora CWS, European Protected Species, Other Protected Species, and Priority Habitats; d) the provision of measures to mitigate noise, and; e) the implications for the underlying groundwater, controlled waters and the local water environment, including the potential impacts on Ground Water Source Protection Zone. Proposals must also be generally in accordance with other policies of the development plan	Policy MS10 refers to land allocated for an extension to Worlington Quarry. The allocated land for the quarry extension is outside of Order Limits. Delivery of the allocated extension is therefore unlikely to be significantly impacted by the Scheme. The Impact of the Scheme on the existing quarry is discussed in Section 2.6 of the Planning Statement.
Cambridgeshire and Peterborough Minerals and Waste Local Plan Adopted 2021		
Policy 5: Mineral Safeguarding Areas	Mineral Safeguarding Areas (MSAs) are identified on the Policies Map for mineral resources of local and/or national importance. The Mineral Planning Authority must be consulted on all development proposals in these areas except: (a) development that falls within a settlement boundary*;	Part of the Scheme is located within a MSA. The impact of the Scheme on MSA has been considered by the Planning Statement [EN010106/APP/7.2] at Section 6.14, which concludes that the Scheme complies with local and national policy regarding safeguarded minerals.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	(b) development which is consistent with an allocation in the Development Plan for the area; (c) minor householder development within the immediate curtilage of an existing residential building; (d) demolition or replacement of residential buildings; (e) temporary structures; (f) advertisements; (g) listed building consent; and (h) works to trees or removal of hedgerows. Development within MSAs which is not covered by the above exceptions will only be permitted where it has been demonstrated that: (i) the mineral can be extracted where practicable prior to development taking place; or (j) the mineral concerned is demonstrated to not be of current or future value; or (k) the development will not prejudice future extraction of the mineral; or (l) there is an overriding need for the development (where prior extraction is not feasible).	
Policy 16: Consultation Areas	Consultation Areas (CAs) are identified on the Policies Map, as a buffer around Mineral Allocation Areas (MAAs), Mineral Development Areas (MDAs), Waste Management Areas (WMAs), Transport Infrastructure Areas (TIAs) and Water Recycling Areas (WRAs). The Mineral and Waste Planning Authority must be consulted on all planning applications within CAs except: (a) householder applications (minor development works relating to existing property); and (b) advertisements. Development within a CA will only be permitted where it is demonstrated that the development will: (c) not prejudice the existing or future use of the area (i.e. the MAA, MDA, WMA, TIA or WRA) for which the CA has been designated; and	Section 2.6 of the Planning Statement [EN010106/APP/7.2] also sets out the relevant planning history, development plan allocations and safeguarded areas within the Order Limits and surrounding areas of the Scheme. This review assists with the consideration of any land use conflicts and associated planning policy compliance. Consultation areas have been identified in Table 2-3 of the Planning Statement [EN010106/APP/7.2]. The Scheme Order limits fall within the 250m consultation areas for safeguarded existing minerals and waste sites and a transport infrastructure area, it is not considered that the introduction of solar PV and supporting infrastructure including substations

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	(d) not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of such new development, due to the ongoing or future use of the area for which the CA has been designated*. Within a CA which surrounds a WRA, and unless convincing evidence to the contrary is provided via an odour assessment report, there is a presumption against allowing development which would: (e) be buildings regularly occupied by people; or (f) be land which is set aside for regular community use (such as open space facilities designed to attract recreational users, but excluding, for example, habitat creation which is not designed to attract recreational users). In instances where new mineral development, waste management, transport infrastructure or water recycling facilities of significance have been approved (i.e. of such a scale that had they existed at the time of writing this Plan it could reasonably be assumed that they would have been identified as a MDA, WMA, TIA or WRA), the policy principle of a CA around such a facility is deemed to automatically apply, despite such a CA for it not being identified on the Policies Map. When considering proposals for non-mineral and non-waste management development within a CA, then the agent of change principle will be applied to ensure that the operation of the protected infrastructure (i.e. MAA, MDA, WMA, TIA or WRA) is not in any way prejudiced. Any costs for mitigating impacts on or from the existing minerals and/or waste related uses will be required to be met by the developer. It is for the developer to demonstrate that any mitigation proposed as part of the new development is practicable, and the continued use of existing sites will not be prejudiced.	and BESSs will affect the future extraction or operation of these sites. This is also concluded Chapter 12 Socio economics and land use of the ES [EN010106/APP/6.1]. Therefore, it is considered that the Scheme is compliant with this policy.
Draft NPS EN-1		
Paragraph 4.3.5	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a	This is addressed in the Assessment of Likely Impacts and Effects, Section 15.8 of Chapter 15: Human Health and Wellbeing Impact Assessment of the ES [EN010106/APP/6.2]. The assessment

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	reason to refuse consent or require specific mitigation under the Planning Act 2008. However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State will want to take account of health concerns when setting requirements relating to a range of impacts such as noise. Opportunities should also be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society i.e. those groups within society which may be differentially impacted by a development compared to wider society as a whole.	has followed the 'HUDU Rapid Health Impact Assessment Matrix' and has assessed the principal health benefits and disbenefits to residents of the local community. Primary mitigation measures are embedded within the Scheme, as set out in the respective chapters, to reduce other operational effects (such as noise, air quality and landscape) which in turn will mitigate the effects on the local community and existing facilities from a human health perspective. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.13.3	This assessment should consider all relevant socio-economic impacts, which may include: • the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero • the contribution to the development of low-carbon industries at the local and regional level as well as nationally • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities • any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains • effects on tourism • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development • cumulative effects - if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe,	The assessment contained in Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] includes an estimate of 1,685 jobs created in total during the construction and decommissioning phases, taking into account the impact of leakage effects, displacement, and multiplier effects of employment. This is estimated to lead to a total direct gross value added per annum of £57,978,126 during the construction phase. During operation of the Scheme it is estimated that a net total of 29 jobs will be directly generated by the proposal. The impact of permanent long-term employment loss following decommissioning has been assessed as a permanent very low adverse, which is not considered significant. Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] considers cumulative effects within its assessment of the above socio-economic

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region	factors. It is therefore considered that the Scheme accords with this policy.
Paragraph 5.13.5	Socio-economic impacts may be linked to other impacts, for example the visual impact of a development is considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to ensure local suppliers are considered in any supply chain.	To help maximise the positive gain for the local economy during the construction phase, a Skills, Supply Chain and Employment Plan will be implemented. An Outline Skills Supply Chain and Employment Plan is included as part of the DCO Application [EN010106/APP/7.8] . The approval of the finalised Plan by the relevant planning authority, and its implementation, is secured by a Requirement in Schedule 2 of the DCO.
Paragraph 5.13.6	Applicants should also consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include for the need to provide temporary accommodation for construction workers if required.	The Applicant considers there is likely to be adequate accommodation within a 45 minute travel study area (based on driving) to accommodate all employees. A 45 minute travel study area (based on driving) represents the principal labour market catchment area for the Scheme An accommodation strategy is not therefore considered appropriate in this case.
Paragraph 5.13.9	The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts. The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1] , appropriate measures to mitigate temporary impacts on users of PROWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. The development of farm land for solar power generation involves little disturbance of the soil and retention of the land resource for future use.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		These embedded design mitigations reduce the potential for adverse impacts against soils and the agricultural land resource. Primary mitigation measures are embedded within the Scheme, these measures are set out in the respective chapters, to reduce other construction and operational effects (such as noise, air quality, transport and landscape) which in turn will mitigate the effects on the local community and existing facilities from a socio-economic and land use perspective. To help maximise the positive gain for the local economy from the beneficial significant effect arising from employment generation during the construction phase, a Skills, Supply Chain and Employment Plan will be implemented. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO. An Outline Skills, Supply Chain and Employment Plan is included with this Application [EN010106/APP/7.8].

Table 9 Relevant policy requirements relating to other impacts of construction, operation and decommissioning - air quality, waste and ground conditions

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 4.10.7	The IPC should be satisfied that development consent can be granted taking full account of environmental impacts. Working in close cooperation with EA and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, the Countryside Council for Wales, Drainage Boards, and water and sewerage undertakers, the IPC should be satisfied, before consenting any potentially polluting developments, that: - the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and - the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.	Appendix 16B: Ground Conditions Phase 1 Preliminary Environmental Risk Assessment of the ES [EN010106/APP/6.2] includes a Ground Conditions Phase 1 Preliminary Environmental Risk Assessment (PERA). This concludes that with the implementation of appropriate mitigation measures, including: - Intrusive site investigation at the post-consent stage; - All plant (i.e. inverters, transformers and switchgear) being installed on concrete bases with suitable bunding where appropriate; - During the operational phase, on-site activity will be minimal and would be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, and monitoring to ensure the continued effective operation of the Scheme; and - A CEMP, OEMP and DEMP will be secured in the DCO, with the aim of (amongst other things) reducing nuisance impacts from dust generation, soil removal and waste generation. These effects will be minimised further as a result of these mitigation measures and are anticipated to be very low to low and not significant. The PERA has identified that the potential contaminant linkages associated with the current use or the Scheme are generally classified as very low to moderate in the absence of additional mitigation. Potential contaminated linkage classified as moderate include lateral migration of potentially contaminated groundwater and potential discharge to surface water towards ecological receptors, including SSSI, SAC and NNR. With the mitigation described above, these effects will be minimised further and are anticipated to be very low to low and not significant.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		Potential contaminant linkages assessed as moderate/low include leaching of contaminants (if present) from overlying soils to groundwater and lateral groundwater migration and discharge to surface water. With the mitigation described above, these effects will be minimised further and are anticipated to be very low to low and not significant.
Paragraph 4.10.8	The IPC should not refuse consent on the basis of pollution impacts unless it has good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.	A PERA is included in Appendix 16B: Ground Conditions Phase 1 Preliminary Environmental Risk Assessment of the ES [EN010106/APP/6.2]. This concludes that with the implementation of appropriate mitigation measures, these effects will be minimised further and are anticipated to be very low to low and not significant. It is anticipated that the permits outlined in the Consents and Agreements Position Statement [EN010106/APP/3.3] will be granted. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.10.8	Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.	The development of farm land for solar power generation and trenching along the cable route involves little disturbance of the soil and retention of the land resource for future use. Embedded design mitigations reduce the potential for adverse impacts against soils and the agricultural land resource. A PERA is included in Appendix 16B: Ground Conditions Phase 1 Preliminary Environmental Risk Assessment of the ES [EN010106/APP/6.2]. This concludes that the risk posed by land contamination is anticipated to be very low to low and not significant. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.2.6	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the Environmental Statement (ES).	The Air Quality Assessment contained in Chapter 14: Air Quality of the ES [EN010106/APP/6.1] includes a Construction Phase Road Traffic Assessment and a Dust Risk Assessment. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme. Embedded mitigation measures are secured in the Framework CEMP (Appendix 16C), Framework DEMP (Appendix

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		16E) and Framework OEMP (Appendix 16F) of the ES [EN010106/APP/6.2].
Paragraph 5.2.7	The ES should describe: ▪ any significant air emissions, their mitigation and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; ▪ the predicted absolute emission levels of the proposed project, after mitigation methods have been applied; ▪ existing air quality levels and the relative change in air quality from existing levels; and ▪ any potential eutrophication impacts.	Chapter 14: Air Quality of the ES [EN010106/APP/6.1] contains a prediction of absolute air emission levels during the construction, operation and decommissioning stages of the Scheme, and includes a Construction Phase Road Traffic Assessment. The Air Quality Assessment also includes the change in predicted NOx concentrations at relevant sensitive receptors. The chapter concludes that that there are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme. Mitigation measures to ensure that there are no off-site impacts from dust and represent good industry practice are set out in Table 14-12 and 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. These are secured in the Framework CEMP (Appendix 16C), Framework DEMP (Appendix 16E) and Framework OEMP (Appendix 16F) of the ES [EN010106/APP/6.2].
Paragraph 5.2.9	The IPC should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits.	Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.2.10	In all cases the IPC must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to non-compliance with a statutory limit the IPC should refuse consent.	Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme; therefore the Scheme is unlikely to lead to a breach of any statutory air quality limits.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.2.11	The IPC should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage.	Mitigation measures pertaining to air quality are incorporated into the Framework CEMP included in Appendix 16C of the ES [EN010106/APP/6.2] , and are summarised in Table 14-12 and Table 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1] . Production of a final CEMP is secured by way of a requirement in the draft DCO. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.6.4	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the Environmental Statement.	A Dust Risk Assessment has been carried out as part of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2]. During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers. The Scheme is not expected to result in an increased risk of insect infestation and will not emit any odour. Construction and decommissioning activities will not include burning materials (as set out in Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2]). For these reasons, smoke, odour and insect infestation risk has not been assessed in the ES.
Paragraph 5.6.5	In particular, the assessment provided by the applicant should describe: ▪ the type, quantity and timing of emissions; ▪ aspects of the development which may give rise to emissions; ▪ premises or locations that may be affected by the emissions; ▪ effects of the emission on identified premises or locations; and ▪ measures to be employed in preventing or mitigating the emissions.	A Dust Risk Assessment has been carried out as part of Chapter 14: Air Quality of the ES [EN010106/APP/6.1] in line with the requirements of this policy. Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		the recommendations set out in Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2]. During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers. The Scheme is not expected to result in an increased risk of insect infestation and will not emit any odour. Construction and decommissioning activities will not include burning materials (as set out in Appendix 16C: Framework CEMP of the ES [EN010106/APP/6.2]. For these reasons, smoke, odour and insect infestation risk has not been assessed in the ES.
Paragraph 5.14.2	Sustainable waste management is implemented through the “waste hierarchy”, which sets out the priorities that must be applied when managing waste: a) prevention; b) preparing for reuse; c) recycling; d) other recovery, including energy recovery; and e) disposal.	As outlined in Section 16.7 of Chapter 16: Other Environmental Effects of the ES [EN010106/APP/6.1], waste arisings will be prevented and designed out where possible. Opportunities to re-use material resources will be sought where practicable. Where re-use and prevention are not possible, waste arisings will be managed in line with the Waste Hierarchy. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.14.3	Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome.	As outlined in Section 16.7 of Chapter 16: Other Environmental Effects of the ES [EN010106/APP/6.1], waste arisings will be prevented and designed out where possible. Opportunities to re-use material resources will be sought where practicable. Where re-use and prevention are not possible, waste arisings will be managed in line with the Waste Hierarchy. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.14.4	All large infrastructure projects are likely to generate hazardous and non-hazardous waste. The EA’s Environmental Permitting (EP) regime incorporates operational waste management requirements for certain activities. When an applicant applies to the EA for an Environmental Permit, the EA will require the application to demonstrate that processes are in place to meet all relevant EP requirements.	The Applicant notes this, but does not anticipate that an EP will be required. Should an EP be required, the Applicant would demonstrate that processes are in place to meet all relevant EP requirements.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.14.6	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. The arrangements described and Management Plan should include information on the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	As detailed in Chapter 16: Other Environmental Effects of the ES [EN010106/APP/6.1], it is proposed that a Construction Resource Management Plan (CRMP) will be prepared to ensure recycling and reuse of materials is maximised. This forms part of the Framework CEMP included in Appendix 16C of the ES [EN010106/APP/6.2]. During construction, operation, and decommissioning, the re-use or recycling of materials will be explored before resorting to landfill options. Waste during the construction, operation and decommissioning phase will be dealt with as part of a CEMP, OEMP and the DEMP, framework versions of which are included in Appendices 16C, 16F and 16E of the Environmental Statement respectively [EN010106/APP/6.2], and of which final versions are secured through requirements in the draft DCO. A decommissioning CRMP would also be produced prior to decommissioning. Therefore, it is not anticipated that there would be a significant effect on waste from the Scheme and the Scheme is therefore considered to be compliant.
Paragraph 5.14.7	The IPC should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. It should be satisfied that: - any such waste will be properly managed, both on-site and off-site; - the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and - adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome.	During the construction, operation and decommissioning of the Scheme, the re-use or recycling of materials will be explored before resorting to landfill options. Waste during the construction, operation and decommissioning phases will be dealt with as part of the CEMP, OEMP and DEMP, framework versions of which are included in Appendices 16C, 16F and 16E of the ES respectively [EN010106/APP/6.2] (with the production of final versions being secured through requirements in the draft DCO) and in line with relevant legislation and guidance. A decommissioning Construction Waste Management Plan (CRMP) will also be produced prior to decommissioning. Therefore, it is not anticipated that there would be a significant effect on waste from the Scheme and it is considered that the Scheme is compliant with this policy.
National Planning Policy Framework (NPPF)		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 174	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	Mitigation measures regarding contaminated land are proposed for the Scheme, including: ●Intrusive site investigation at the post-consent stage; ●All plant (i.e. inverters, transformers and switchgear) being installed on concrete bases with suitable bunding where appropriate; ●During the operational phase, on-site activity will be minimal and would be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, and monitoring to ensure the continued effective operation of the Scheme; and ●A CEMP, OEMP and DEMP will be secured in the DCO, with the aim of (amongst other things) reducing nuisance impacts from dust generation, soil removal and waste generation. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 183	Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.	A PERA is included in Appendix 16B: Ground Conditions Phase 1 Preliminary Environmental Risk Assessment of the ES [EN010106/APP/6.2]. This concludes that with the implementation of appropriate mitigation measures, these effects will be minimised further and are anticipated to be very low to low and not significant. Therefore it is considered that the Scheme is compliant with this policy.
Paragraph 186	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision	Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme; therefore the Scheme is unlikely to lead to a breach of any statutory air quality limits.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	There are no Clean Air Zones or Air Quality Management Areas in the vicinity of the Scheme, therefore there have been no local air quality action plans applicable to the Scheme. Mitigation measures pertaining to air quality are incorporated into the Framework CEMP for the Scheme (with production of the final CEMP being secured through the DCO) and are summarised in Table 14-12 and Table 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV9: Pollution	All development proposals should minimise, and where possible, reduce all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in air and water quality. All applications for development where pollution is suspected must contain sufficient information to enable the Council to make a full assessment of potential hazards and impacts. Proposals will be refused where, individually or cumulatively, there are unacceptable impacts arising from the development on: ▪The natural environment, general amenity and the tranquillity of the wider rural area, including noise and light pollution; ▪ Health and safety of the public; ▪ Air quality; ▪ Surface and groundwater quality; ▪Land quality and condition; or ▪ Compliance with statutory environmental quality standards. In exceptional cases, development proposals may be permitted where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development substantially outweigh any adverse impact in terms of pollution. In such cases, where pollution is unavoidable, mitigation measures to reduce pollution levels will be required in order to meet acceptable standards. New development will not be permitted where there is a potential to	Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] concludes that there will be no permanent significant adverse noise effects from construction and decommissioning works noise on local receptors. There are potentially significant cumulative adverse effects from construction noise during the construction phase. To minimise the potential for cumulative effects the Scheme will have a designated Site Manager during construction who will liaise with these other developments to identify measures that can be undertaken to minimise disruptions and noise effects. The mitigation measures for both the construction/decommissioning and operational phases are outlined in section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1]. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme; therefore the Scheme is unlikely to lead to a breach of any statutory air quality limits. Mitigation measures pertaining to air quality are incorporated into the Framework CEMP for the Scheme (with production of the final CEMP being secured through the DCO) and are summarised in Table 14-12

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	conflict with existing developments that require particular conditions for their operation, or that are authorised or licensed under pollution control or hazardous substances legislation, where it would be likely to impose significant restrictions on the activities of the existing use in the future.	and Table 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy.
Forest Heath District Council Core Strategy Adopted 2010		
Policy CS4: Reduce Emissions, Mitigate and Adapt to future Climate Change	The Council will promote and encourage all development proposals to deliver high levels of building sustainability in order to avoid expansion of the districts ecological footprint and to mitigate against and adapt to climate change. All new development proposals will be required to demonstrate how it minimises resource consumption, minimises energy consumption compared to the current national and regional minimum requirements and how it is located and designed to withstand the longer term impacts of climate change. Sustainable construction methods will be encouraged in all new dwellings to achieve at least three star rating under the Code for Sustainable Homes. The Council will monitor changes to standards and will consider introducing a requirement for development schemes to comply with higher sustainable construction standards where there is evidence to justify doing so. These standards require consideration of issues such as: - adequate provision for separation and storage of waste for recycling; and - use of materials from a sustainable local source in new development. The Council will require development proposals to comply with Policy ENG1 of the Regional Spatial Strategy in contributing to the provision of decentralised, renewable and low carbon energy sources.	As outlined in Section 16.7 of Chapter 16: Other Environmental Effects of the ES [EN010106/APP/6.1], waste arisings will be prevented and designed out where possible. Opportunities to re-use material resources will be sought where practicable. Where re-use and prevention are not possible, waste arisings will be managed in line with the Waste Hierarchy. It is therefore considered that the Scheme is compliant with this policy.
Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015)		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively, there are likely to be unacceptable impacts arising from the development on: • the natural environment, general amenity and the tranquillity of the wider rural area; • health and safety of the public; • air quality; • surface and groundwater quality; • land quality and condition; or • compliance with statutory environmental quality standards.	Chapter 9: Water Environment of the ES [EN010106/APP/6.1] presents the potential for effects on the water environment during the construction, operation and decommissioning of the Scheme. This outlines that there are likely to be no significant adverse effects on water quality, water resources or physical characteristics of the water environment. Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] concludes that there will be no permanent significant adverse noise effects from construction and decommissioning works noise on local receptors. Cumulative effects from the operational noise affecting the nearest receptors at Burwell are considered to be limited to minor adverse. Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that there are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme. A PERA is included in Appendix 16B: Ground Conditions Phase 1 Preliminary Environmental Risk Assessment of the ES [EN010106/APP/6.2]. This concludes that the risk posed by land contamination is anticipated to be very low to low and not significant. It is therefore considered that the Scheme is compliant with this policy.
Draft NPS EN-1		
Paragraph 5.2.10	In all cases, the Secretary of State must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the applicant should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In particular, where a project is located within, or in close proximity to, a Local Air Quality Management Area or Clean Air Zone, applicants should engage with the relevant local authority to ensure the project is compatible with the local air quality	The Scheme is not located in or near to an AQMA or CAZ, and air quality limits are not in danger of being exceeded. Therefore mitigation measures are not required.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	plan. In the event that a project will lead to non-compliance with a statutory limit the Secretary of State should refuse consent.	

Table 10 Relevant policy requirements relating to major accidents and disasters

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
National Planning Policy Framework (NPPF)		
Paragraph 97	Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.	Section 16.5 of Chapter 16: Other Environmental Topics of the ES [EN010106/APP/6.1] contains an assessment of all possible major accidents or disasters that could be relevant to the Scheme. This long list was drawn from several sources, including the UK Government's Risk Register of Civil Emergencies. The Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] includes additional mitigation measures that are incorporated as part of the Scheme to reduce fire risk. Given the nature of accidents and disasters, there is the potential for significant effects if an event does occur, however, the assessment has concluded that the risk of such events occurring is low for the Scheme and significant effects on the environment are therefore not anticipated. The focus is on prevention of major accidents and disasters, and mitigation if an event does occur. Taking into account the good industry practice and additional mitigation measures discussed above, the risk of accidents and disasters is considered to be low. Therefore, it is considered that the Scheme is compliant with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		
Policy ENV9: Pollution	All development proposals should minimise, and where possible, reduce all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in air and water quality. All applications for development where pollution is suspected must contain sufficient information to enable the Council to make a full assessment of potential hazards and impacts. Proposals will be refused where, individually or cumulatively, there are unacceptable impacts arising from the development on: •The natural environment, general amenity and the tranquillity of the wider rural area, including noise and light pollution.	Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1] concludes that there will be no permanent significant adverse noise effects from construction and decommissioning works noise on local receptors. Cumulative effects from the operational noise affecting the nearest receptors at Burwell are considered to be limited to minor adverse. The mitigation measures for both the construction/decommissioning and operational phases are outlined in section 11.7 of Chapter 11: Noise and Vibration of the ES [EN010106/APP/6.1].

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	Health and safety of the public. In exceptional cases, development proposals may be permitted where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development substantially outweigh any adverse impact in terms of pollution. In such cases, where pollution is unavoidable, mitigation measures to reduce pollution levels will be required in order to meet acceptable standards. New development will not be permitted where there is a potential to conflict with existing developments that require particular conditions for their operation, or that are authorised or licensed under pollution control or hazardous substances legislation, where it would be likely to impose significant restrictions on the activities of the existing use in the future.	Chapter 14: Air Quality of the ES [EN010106/APP/6.1] concludes that here are anticipated to be no significant adverse effects on air quality as a result of the construction, operation or decommissioning of the Scheme; therefore the Scheme is unlikely to lead to a breach of any statutory air quality limits. Mitigation measures pertaining to air quality are incorporated into the CEMP for the Scheme and are summarised in Table 14-12 and Table 14-13 of Chapter 14: Air Quality of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy. No impact of the Scheme on existing developments by way of pollution has been identified.

Table 11 Relevant policy requirements for the transport and access assessment

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
NPS EN-1		
Paragraph 5.13.3	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.2) should include a transport assessment, using the NATA/WebTAG139 methodology stipulated in Department for Transport guidance, or any successor to such methodology. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation.	Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2] contains a transport assessment. As outlined in Appendix 13A: Relevant Legislation and Policy of the ES [EN010106/APP/6.2], this utilises the March 2014 Travel Plans, Transport Assessments and Statements guidance produced by the Ministry of Housing, Communities and Local Government. The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Chapter 13: Transport and Access of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.13.4	Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.	Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan, which includes traffic management and travel plan management measures. The Scheme also proposes enhancement measures which include three permissive routes which are identified in Appendix 13B: Transport Assessment of this Environmental Statement [EN010106/APP/6.2] which will result in minor benefits to NMUs in the long term. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.13.6	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the IPC should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the IPC should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. Applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts.	Section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] outlines the embedded design mitigation measures in relation to traffic and transport, including HGV deliveries and staff vehicles. Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction,

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
		operation or decommissioning of the Scheme. Therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.13.7	Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts identified in the NATA/WebTAG transport assessment, with attribution of costs calculated in accordance with the Department for Transport's guidance, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.	Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme following the implementation of the mitigation measures identified in Section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1]. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.13.8	Where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts.	Provision of new inland transport infrastructure is not required, as Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme following the implementation of the mitigation measures identified in Section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] therefore, no additional mitigation, other than the embedded mitigation, is proposed.
Paragraph 5.13.9	The IPC should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.	Traffic generated by the Scheme during its operational phase will not be of a level that requires management. During the construction and decommissioning periods, traffic impact will be managed in accordance with measures set out in Appendix 13C: Framework Construction Traffic Management Plan (CTMP) and Travel Plan (TP) of the Environmental Statement [EN010106/APP/6.2], and the Framework Decommissioning Environmental Management Plan (DEMP) that is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2]

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Paragraph 5.13.10	Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.	Given the context of the Order limits and the requirements for construction deliveries, rail and water borne transports are not considered to be appropriate methods of transport.
Paragraph 5.13.11	The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that: ▪ control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements; ▪ make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and ▪ ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force	Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on the wider transport network as a result of the construction, operation or decommissioning of the Scheme following the implementation of the mitigation measures identified in Section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1]. This embedded mitigation is secured through the Framework CEMP (Appendix 16C) of the ES [EN010106/APP/6.2]. Therefore, it is considered that there is no requirement to attach additional requirements to the DCO consent.
National Planning Policy Framework (NPPF)		
Paragraph 100	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	The Scheme proposes enhancement measures which include three permissive routes which are identified in Appendix 13B: Transport Assessment of this Environmental Statement [EN010106/APP/6.2] which will result in minor benefits to NMUs in the long term. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 104	Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;	Section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] outlines the embedded design mitigation measures in relation to traffic and transport, including HGV deliveries and staff vehicles. Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users

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	c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.	(NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme. As outlined in section 13.9 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1], three new permissive routes may be provided during the operation phase of the Scheme, which are identified in Figure 15 of the ES [EN010106/APP/6.1]. These will enable increased public access across the landscape of the local area. Overall it is considered that transport issues have been considered throughout and have been addressed through the Scheme design.
Paragraph 110	In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: b) safe and suitable access to the site can be achieved for all users; d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs), highway safety or public transport users as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 111	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs), highway safety or public transport users as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 113	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.	Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan. The application is also supported by a transport assessment which can be found in Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2]. Therefore it is considered that the Scheme is compliant with this policy.
East Cambridgeshire District Council Local Plan Adopted April 2015		

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
Policy COM7: Transport Impact	Development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport appropriate to its particular location. Opportunities should be maximised for increased permeability and connectivity to existing networks. Development proposals shall: - Provide safe and convenient access to the highway network. - Provide a comprehensive network of routes giving priority for walking and cycling. - Protect existing rights of way or allow for agreed diversions in exceptional circumstances. - Consider the travel and transport needs of people with disabilities. - Accommodate the efficient delivery of goods, supplies and services. - Be capable of accommodating the level/type of traffic generated without detriment to the local highway network and the amenity, character or appearance of the locality. - Be accompanied by a Transport Statement where appropriate; or if the proposals are likely to result in significant transport implications, be accompanied by a Transport Assessment. The coverage and detail of this should reflect the scale of development and the extent of the transport implications. - Be accompanied by a Travel Plan for residential and non-residential developments that are likely to generate significant amounts of traffic; and - Within (g) and (h) indicate any steps to mitigate impacts relating to noise, pollution, amenity, health, safety and traffic.	Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2] contains a transport assessment. As outlined in Appendix 13A: Relevant Legislation and Policy of the ES [EN010106/APP/6.2], this utilises the March 2014 Travel Plans, Transport Assessments and Statements guidance produced by the Ministry of Housing, Communities and Local Government. As detailed in Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2] of the ES, there are no issues of highway safety arising as a result of the construction, operation or decommissioning of the Scheme. Overall the Scheme will enhance the PROW network. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PROWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan. It is therefore considered that the Scheme is compliant with this policy.
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Policy DM44: Rights of Way	Development which would adversely affect the character of, or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist, or horse rider use.	Three PROWs (W-257/002/0, W-257/002/X, and W-257/007/0) are located within the boundary of the Sunnica East Site A, which run from Mortimer Lane in the south to Beck Road in the north. Within the boundary of Sunnica East Site B. There is PROW (W-257/003/0) which runs along the south-western boundary from Turnpike Road at Red Lodge in the south-east to Badlingham Manor in the north-west

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	Improvements to such rights of way will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate and to achieve the objectives of the Suffolk Rights of Way Improvement Plan.	and an unclassified road (U6006), which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington. As detailed in Section 12.7 of Chapter 12: Socio-Economics of the ES [EN010106/APP/6.1], appropriate measures to mitigate temporary impacts on users of PRoWs during the construction and decommissioning phases have been proposed. The temporary closures will be supported by clear signs and where possible will be planned and programmed to minimise disruption to users. Chapter 10: Landscape and Visual Amenity of the ES [EN010106/APP/6.1] includes consideration of the impact on users of rights of way and describes mitigation that will reduce likely impacts. Therefore, it is considered that the Scheme is compliant with this policy.
Policy DM45: Transport Assessments and Travel Plans	For major development and/or where a proposal is likely to have significant transport implications, the Council requires the applicant to submit the following documents alongside their planning applications: a. a Transport Assessment* appropriate to the scale of development and the likely extent of transport implications; b. a Travel Plan that identifies the physical and management measures necessary to address the transport implications arising from development. Where a Transport Assessment and/or Travel Plan does not demonstrate that the travel impacts arising from the development will be satisfactorily mitigated or that adequate measures are in place to promote the use of more sustainable modes of transport, then planning permission will not be granted. The developer will be expected to provide the necessary funding to deliver any travel plan agreed in writing with the local planning authority. Where it is necessary to negate the transport impacts of development, developers will be required to make a financial contribution,	Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2] contains a transport assessment. As outlined in Appendix 13A: Relevant Legislation and Policy of the ES [EN010106/APP/6.2], this utilises the March 2014 Travel Plans, Transport Assessments and Statements guidance produced by the Ministry of Housing, Communities and Local Government. Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan. The Scheme includes embedded design mitigation measures which are set out in section 13.7 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] and section 6 of the Appendix 13C: Framework CTMP and TP of the Environmental Statement [EN010106/APP/6.2] therefore, it is considered that financial contributions will not be necessary.

Relevant Paragraph/Policy Reference	Policy Requirement	Compliance with Policy
	appropriate to the scale of the development, towards the delivery of improvements to transport infrastructure or to facilitate access to more sustainable modes of transport. *Indicative thresholds for application of transport assessments/transport statements are contained at Appendix B, Department for Transport Guidance March 2007, Guidance on Transport Assessment.	
NPS EN-1		
Paragraph 5.14.4	Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts. The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan, which includes traffic management and travel plan management measures. Therefore, it is considered that the Scheme is compliant with this policy.
Paragraph 5.14.8	The Secretary of State should only consider preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe.	Section 13.8 of Chapter 13: Transport and Access of the ES [EN010106/APP/6.1] states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.